



Rural VT Climate Council Public Comments September 2021

Dear Members of the Climate Council Subcommittees and Climate Council,

Rural Vermont is a member-based, grassroots, agricultural organization which has organized, advocated, and educated for a just, equitable, and environmentally sound food web and working lands community in VT for more than 35 years. We are active members of local and regional alliances such as the Farm to Plate Network, as well as national and international coalitions such as the National Family Farm Coalition and Via Campesina.

Our Policy Director, Graham Unangst-Rufenacht, has attended and provided public comment at many of the Ag and Ecosystems Subcommittee meetings throughout much of its process. Though our comments will predominantly focus on this committee's scope of practice - we recognize that our comments are also highly relevant to other sub-committees, in particular Just Transition and Rural Resilience and Adaptation. For some of our recommendations, it is not clear which sub-committee is appropriate to address them to, and in some cases, there will likely be overlap.

We express our gratitude to the many people who are giving their time and expertise to this process through their work on the Sub-Committees, and thank you for the due consideration of our recommendations, concerns, and ideas.

Vision

There is a quantifiable vision for mitigations reductions in the GWSA, there are also statements in statute about what outcomes the strategy shall achieve - however, there isn't a draft vision articulated for what the future we are growing towards will look like. It may be helpful to consider developing such a collaborative vision, as it may make more transparent the various visions and understandings of the climate context which different people are coming to the table with.

We suggest that a vision for the Agriculture and Ecosystems sub-committee be grounded in [Food Sovereignty](#), [Agroecology](#) (local resource), [Climate Justice](#), and the principles of the [Just Transition](#) movement. And that the future context identified and planned for be rooted in materials which confront the stark realities of the dramatically altered world we are beginning to experience, such as the most recent [UN IPCC Report](#).

High Level Points

Despite the GWSA focus on GHG emissions reductions, and climate adaptation and resilience; we encourage the Climate Council to understand its mission, its desired outcomes, and indeed the context of our time and place more holistically. We are living in the midst of the anthropocene, the 6th great extinction event we know of on Earth. We have a number of interrelated environmental crises (climate change, water access and rights, dramatic insect population decline, biodiversity loss and species' extinction, pollution of water / land / biota via plastics, PFAS, etc.), and human health, equity, and justice crises (disparities in land access and ownership, voting rights, mass incarceration, systemic racism, economic inequity) which intersect and connect us wherever we are on this planet. It is imperative that we work towards meeting these crises as a whole as opposed to in segmented parts, in which the impacts of a "solution" to one crisis may not be considered in relation to its impacts on other crises, and / or in other places.

It is important to constantly be aware of and understand how our work here intersects with other work regionally, nationally, and internationally - and ensuring that the work we do is aligned with civil society and environmental interests, voices, and organizations and not corporate or market interests, and an accurate accounting of GHG emissions, the greater environmental and ecological context, as well as and other human impacts and needs. There is currently a significant divide between civil society organizations and corporate and government actors at the national and international levels with respect to the future of our food webs. The UN Food Summit is being actively boycotted by a broad coalition internationally, and we see a similar push back nationally against the increasingly consolidated and concentrated food system and proposals for national “carbon markets” and the concept of “carbon off-sets” more broadly. It is critical that this body - VT’s Climate Council - understand its role in the greater context of global climate change and politics, and how even the language we use (for example, “climate smart agriculture” vs. “agroecology”) can belie the influence of particular actors on our thinking and signal particular understandings to different communities.

Some of the most important mandates and objectives we see in the GWSA we would like to presence:

- ACHIEVE LONG-TERM SEQUESTRATION AND STORAGE OF CARBON AND PROMOTE BEST MANAGEMENT PRACTICES TO ACHIEVE CLIMATE MITIGATION, ADAPTION, AND RESILIENCE ON NATURAL WORKING LANDS
- REDUCE ENERGY BURDENS FOR RURAL AND MARGINALIZED COMMUNITIES
- LIMIT THE USE OF CHEMICALS, SUBSTANCES, OR PRODUCTS THAT CONTRIBUTE TO CLIMATE CHANGE; AND
- BUILD AND ENCOURAGE CLIMATE ADAPTATION AND RESILIENCE OF VERMONT COMMUNITIES AND NATURAL SYSTEMS
- PRIORITIZE THE MOST COST-EFFECTIVE, TECHNOLOGICALLY FEASIBLE, AND EQUITABLE GHG EMISSIONS REDUCTION PATHWAYS, ADAPTATION AND PREPAREDNESS;
- PROVIDE FOR GHG EMISSIONS REDUCTIONS THAT REFLECT THE RELATIVE CONTRIBUTION OF EACH SOURCE OF EMISSIONS
- MINIMIZE NEGATIVE IMPACTS ON MARGINALIZED AND RURAL COMMUNITIES AND INDIVIDUALS WITH LOW AND MODERATE INCOMES
- SUPPORT ECONOMIC SECTORS AND REGIONS OF THE STATE THAT FACE THE GREATEST BARRIERS TO EMISSIONS REDUCTIONS (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 SOLUTIONS (INC. WORKING LANDS) TO REDUCE GHG, SEQUESTER CARBON AND INCREASE RESILIENCE

Current GHG Inventory Feedback and Need for Supplemental Analysis, Research, Consideration:

“§ 582. Greenhouse gas inventories; registry ... (g) In consultation with the Department of Public Service created under 30 V.S.A. § 1, the Secretary shall 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.*”

There are **significant deficiencies in the current GHG Inventory**, including not accounting for a lifecycle analysis as required by statute, which if ignored and not accounted for will significantly undermine the outcomes of this process:

- Methane emissions and equity issues related to hydro-quebec (flooding of indigenous land)
- Methane emissions and equity issues related to the fracking and storage and transmission of natural gas burned in VT (fracked gas from indigenous territory in Alberta)
- CO2 from VT’s two wood burning electricity generating plants

- All electricity emissions in VT considered “off-set” by RECs purchased primarily from Hydroquebec by GMP (see our comments questioning the concept and outcomes of “off-sets” later in this document)
- VT State Fund investment in TD Bank and its Enbridge Line 3 Pipeline project; compromising climate, environment, water supply and indigenous rights and sovereignty
 - key component of a State Climate Plan in the realm of economics - achieving mitigation and equity outcomes
 - would be the development and implementation of a VT State Bank
- VT Pension Investment Committee \$100 million investment in TIAA’s global farmland subsidiary Nuveen
 - This investment undermines local resource and food sovereignty, human rights, and environmental outcomes around the world.
 - <https://news.mongabay.com/2021/02/trader-cargill-pension-fund-tiaa-linked-to-land-grabs-in-brazils-cerrado/>
 - <https://www.bloomberg.com/news/articles/2020-12-17/u-s-pension-fund-tiaa-embroiled-in-brazil-land-purchase-probe>
 - <https://www.social.org.br/index.php/reports/reports-english/253-tiaa-and-harvard-s-brazilian-farm-deals-judged-illegal.html>
 - <https://www.actionaidusa.org/publications/tiaas-accumulation-of-farmland-is-not-responsible/>
 - <https://foe-us.medium.com/harvard-and-tiaas-farmland-grab-in-brazil-goes-up-in-smoke-52dbfe57debf>

In reviewing the current Greenhouse Gas Inventory for the State of VT, in particular for agriculture, we recommend that the Sub-committee, and Climate Council itself, do more work to supplement this analysis with more detail which is acknowledged to be missing from the current Inventory, leaving it at best incomplete. For example, it is acknowledged that this is not a “carbon lifecycle” or “throughput” analysis. Though there may be reasons for this, we think that it is also critical to consider life cycle analyses (or aspects of them) in order to approach, understand, and act holistically (it is also required in statute). Likewise, aspects of it are scientifically inaccurate, such as the considerations of the production and impact of methane created through “enteric fermentation” by ruminants. Inaccuracies such as this create further inequities as particular actors are disproportionately and erroneously burdened with the responsibility for emissions and reductions. Some examples of why this is important:

- The current analysis shows that 53% of VT’s agricultural emissions are from “enteric fermentation”. However, we also know that [methane emissions from ruminants vary depending on management and feed sources, that methodologies for accounting for enteric fermentation and methane production are being improved upon](#), and that some [life cycle analyses show Adaptive Multi-Paddock \(AMP\) grazing to be a net carbon sink](#). We see current research as incomplete - but with some significant indicators we can work with. One method discussed for reducing emissions from “enteric fermentation” by the Ag and Ecosystems subcommittee has been to explore supplementing feed regimes, with particular seaweeds. If this is successful, how will it be reflected in the data if the data itself does not differentiate based on feed / management, and how will we know how effective it is if it’s not currently reflected in the data (i.e. - if different management methods are not currently reflected in the data)? How effective is this solution if the data is derived from an incomplete understanding of the physio-chemical-biological processes affecting methane emissions from cattle on well managed pasture? And critically, how would the reliance of imported seaweed affect oceans, and the folks who work them fishing, harvesting, and farming independently (see more specific information on this in “Tensions and Trade-Offs” section of comments)? Why are we looking to import a “solution” as opposed to addressing it with low hanging fruit locally - such as improving pasturing, and increasing high tannin forages and fodder (which intersects with one of the most potent farm based strategies for climate and the environment - agroforestry and holistic / AMP grazing)? This isn’t to say that supplementing animals or soils with seaweed (often done for micronutrients) is necessarily harmful in and of itself - it’s to say that when it’s proposed as a strategy and key ingredient to reduce climate impacts in large confinement farms when there are other ways of addressing these concerns which get to the root of the problem, are locally sourced, and do not exploit our oceans and the fisherfolk who work them, is an inequitable decision and irrational decision.

- The current Inventory also states that it does not account for anaerobic digester emissions, and we also wonder if it accounts for the environmental cost of materials to build the digesters. As we consider capital and material intensive projects which mitigate negative impacts (such as digesters and manure pits) as potential climate mitigation strategies - it is important that we have a full understanding of their climate and environmental impact, as well as alternatives to this method of manure / herd management. These are typically large scale intensive projects which mitigate the impact of existing environmental issues on farms, and it is often the case that mitigation of problems is funded to the exclusion of proactive funding of management strategies (or infrastructure which facilitates such) which do not require mitigation, and are in some cases generative of positive environmental outcomes. We must both address active pollution issues on farms by funding mitigation efforts as well as fund proactive investments which address the root causes of negative environmental impacts of farms and ultimately shift our agricultural system to one which is generative of positive environmental, social, and economic outcomes. There are equity considerations as well with large scale capital intensive projects which affect a few farms, in terms of who and what type / scale of farm or farm management is able to access funding, and how much is distributed to different types and scales of farms in general. See section in “Tensions and Tradeoffs” on “Mitigation vs. Transformation”.

- Pesticides (economic poisons broadly), synthetic fertilizers, and plastics, are other examples of the importance of exploring a more thorough analysis, as well as approaching climate change as one aspect of holistic health for our agriculture, communities, and environment. Not only do these substances have clear environmental and human health costs (from production, to distribution, to use), but they also reflect a significant reliance on vulnerable global systems of production and distribution. Reducing the use of these substances is also a part of the GWSA statute and mandate:
 - *“LIMIT THE USE OF CHEMICALS, SUBSTANCES, OR PRODUCTS THAT CONTRIBUTE TO CLIMATE CHANGE”*

- The GHG Inventory and quantifiable emissions reductions are also only one part of the Council and Sub-Committees’ mandates - and it is important that it not be seen as primary in relationship to other mandated considerations such as *equity, resiliency, and adaptation*. Local and regional food production, medicines production, fiber production, forest products production, traditional crafts production, etc. and the knowledge to do so are critical to our survival as a species in the era of Climate Change and the Anthropocene. Especially when the focus is agriculture, we understand that emissions from agriculture in VT are a relatively small portion of the current GHG Inventory (app. 12%) - and that the resilience, equity, and adaptability of our food and forestry systems are critically important to food and resource sovereignty, equity, food security, and our climate future. We also know that there are extreme disparities - based in economic and racial inequities - in *who* has access to agricultural land, knowledge, and agency. Climate resilient and adaptable agricultural, forestry, and food systems must be accessible, affordable, and of a scale and type which can endure disruptions to our global, national, and regional supply networks. From a human health and community perspective, resiliency, equity, and the capacity for adaptation are largely informed by peoples’ abilities to meet their most critical needs locally such as healthcare, childcare, eldercare, education, food, water, heating, and housing, etc.; and to not only be free from discrimination - but to have reparative policies which equitably empower and assist historically disadvantaged communities.
 - Rural Vermont strongly urges the climate council, and appropriate sub-committees, to make publicly funded universal healthcare, parental and family leave, childcare, eldercare, and higher education a priority. Likewise, the intersection of “food access and security” looms large and perhaps as low hanging fruit for all of these subcommittees - we have small and medium scale farmers who want to produce for local markets, who need markets which provide just compensation, and who are committed to environmentally sound management; and we have nearly 1/3 of Vermont households facing food insecurity. How do we connect these dots? The importance of social programs, education, and equity to climate policy is explored in many resources, such as Drawdown.

Tensions and “Trade-offs”

- Carbon mitigation and quantitative measurement vs. Climate adaptation and resilience and qualitative measurement / goals
 - Agricultural emissions are a relatively small portion of VT's emissions portfolio based on the GHG Emission Inventory. It is important to reduce emissions in all sectors, however, agriculture, forestry, traditional land-based practices are all critical to human survival and to successful adaptation to climate change. We urge the sub-committee to focus primarily on climate adaptation and resilience for this reason. We understand that operations scaled for success in locally and regionally based systems of land management, processing, product sourcing, distribution, etc. to be more resilient and adaptable and equitable than globally scaled, commodity based, systems. Our recent experience as a State and global community with Covid has provided a striking example of this.
- Site and Farm Specific Holism vs. Farm Systems Analysis
 - What is the greater system the farm, forestry business, etc. is a part of?
 - Local or regional sourcing, transport and distribution vs. national or global re: GHG emissions, resilience, and adaptability?
- Mitigation vs. transformation / generation
 - It is important that we meet people and businesses where they are in terms of transitioning to reduce negative impact or improve upon positive impact; it is also important that we work towards a system in which improving and supporting positive impact (transformation, generation).
 - An example of mitigation (reducing negative impact), is "precision ag" which focuses on more targeted use of synthetic fertilizers and pesticides via industry innovation and markets. An example of transformation / generation, is strategically transitioning to systems which do not use, and are not reliant upon, synthetic fertilizers and pesticides; and if needed, to develop very specific protocols for their use in extreme circumstances. This is how most food production has occurred throughout most of human history, and continues to be how a significant amount - if not the majority - of food production occurs globally. We must work with people managing systems dependent upon these substances to understand, address, and afford the barriers to shifting production systems. It is critical that these transitions justly consider and support these managers - and it is ultimately also not an option to not work to phase out the production and use of these substances given their significant environmental and human health impacts. The onus for the prevalence of these substances and their entrenchment in existing production systems - and the cost of transitioning - is largely at the feet of policymakers, industry, and academics who have, and in many cases continue to, manufacture, promote, condone, and sell these substances to those using them.
- Big capital investments aimed at mitigation on a few operations vs. more equitable distribution of funds aimed at supporting positive transformation (ie root cause).
 - This is not an either / or - we need an equitable approach to these considerations whereas we currently spend a disproportionate amount of money on capital intensive mitigation projects on a few farms vs. pro-actively supporting small scale generative projects on more farms.
- Feed adaptation with seaweed vs. feed adaptation via locally produced high tannin forages, fodders, and stored feeds:
 - *"We advocate against industrial-scale seaweed farming whether it's for human consumption, animal feed or other end uses. The underlying rationale is the same: industrial seaweed farming would involve converting publicly accessible areas into private enclosures to the detriment of coastal communities; there is a significant risk that such large-scale operations would disrupt the marine ecosystem in unforeseeable ways; and big corporations would be profiting off of a public resource and expanding control of farmland, productive areas offshore, and the entire food supply chain."* (Rosanna Marie Neil, Esq. - National Atlantic Marine Alliance, personal correspondence)
 - https://static1.squarespace.com/static/517fe876e4b03c6b86a4b81b/t/5c7f62e40d92970488a8edc9/1551852265815/blue+growthand+SSF_AS.pdf
 - <https://www.frontiersin.org/articles/10.3389/fmars.2019.00107/full>

- Rotational vs. AMP grazing
 - It is less important that we focus on the language, than the practices themselves much of the time, however; we have seen the confusion that occurs scientifically and culturally when we identify all types of “rotational grazing” as the same, with the same components and outcomes. AMP or Holistic grazing refers to specific methods of rotational grazing involving frequent movements of animals, leaving higher residuals, and achieving rest periods for paddocks / land which are needed for adequate and appropriate regrowth. As documented previously in the discussion of methane emissions, the impacts of holistic grazing are very positive when it comes to environmental outcomes (“generative”) whereas rotational grazing is less well defined or clear, and should be considered an improvement over “continuous” grazing (“mitigation”).
- “No-till” P benefits vs. Carbon costs
- Terms we use:
 - “Climate smart ag” and “nature based solutions” vs. “agroecology”
 - The terms we use in this context have history, and they signal the influences of our ideas, systems, etc. In the global movements for agroecology and climate justice, terms such as “climate smart ag” and “nature based solutions” are seen as corporate co option of terms such as “agroecology” - which serve to divest the social and economic equity components from these conversations.
 - Our point in mentioning this, is to highlight the positionality of our VT work in the context of the global work ongoing and its history; and the importance of understanding this. It is not to dismiss work or people using this language
- Outcomes, Practices, Systems:
 - It’s important to consider categorized outcomes (ie. carbon sequestration), but also specific practices - and at times sequences of practices, or suites of practices - in their holistic impact (ie. AMP Grazing). If we look at, value, and measure, carbon sequestration - we will not adequately account for the disparate holistic impacts of different practices and farming types. Furthermore, we must acknowledge that our tools and metrics for measuring specific outcomes are imperfect and ever evolving. For example, people managing their livestock with Adaptive Multi-Paddock Grazing are biologically spreading manure, urine, and gathering animal feed for the growing season (the cattle are doing it themselves with the aid of fencing and human intervention); they are relying on primarily perennial forages (vs. annually seeded crops), and leaving a higher residual (more photosynthesis, more habitat, etc.) than those using continuous grazing or grazing with infrequent rotations. Whereas many farms which do not use this method are mechanically (i.e. fossil fuel use) gathering and spreading manure, buying-in or feeding out stored feed during that period of time. Likewise, many farms managing the same types of animals use radically different types of manure storage (liquid vs. dry / composted) which also have radically different emissions and water and air quality impacts, as well as infrastructure costs associated with them. Focusing on one outcome - or a limited number measured in particular ways - must only be one component of a more holistic program which takes into account the greater impacts of the farm’s management.
 - Farms which distribute food locally and regionally, also have a smaller fossil fuel impact and are arguably more climate resilient as they are not as reliant on national or global food system infrastructure as larger farms. During the pandemic, we saw the reliance of local communities on local producers, and we likewise saw the vulnerability of larger supply chains in sectors such as meat and dairy. From an equity perspective, those who market their own products are price makers, not price takers; and the longevity of their businesses is not as dependent on decision makers outside of their farms.
 - Focusing on practices does not need to be divisive if it is grounded in reliable data, and if we are focusing on approaching farms as unique entities. We are not saying one kind of farming is good or another bad - we are pointing out the impacts of different types of farming and trying to create metrics for rewarding choices with more positive impacts.

- “Net Zero”, Carbon Markets and Carbon Off-sets
 - [These are not climate change solutions](#); these are solutions for corporations which do not reduce emissions and other impacts, and which do not maximally benefit farmers, and foresters. We must both reduce our emissions as well as improve our agricultural, forestry and other practices - we cannot trade one for the other. Commodified pollution from emissions which are “traded” does not vanish - and still impacts those communities present at the source and abroad. [Money available for climate change mitigation, adaptation, etc. is best spent going directly to farmers, foresters,](#) and others working to improve aspects of their environmental impact in VT and not being run through a corporate trading mechanism.
 - NOFA NY has adopted a resolution against carbon markets which can be found on its [website](#).

Specific Ideas, Suggestions, and Proposals (apart from considerations offered above):

- Soil Health and Payments for Ecosystem Services Working Group and Climate Council Sub-Committee on Ag and Ecosystems Collaboration
 - The desired outcomes and tasks of the PES WG and the Climate Council Subcommittee on Ag and Ecosystems have significant overlap - not to mention the F2P / VAAFPM Strategic Agricultural Plan. We support these entities collaborating and sharing communication and resources when possible - recognizing that both groups also share particular members. This also allows these groups to share input from community members, experts in particular fields, etc.
 - The Agriculture Strategic Plan has many key “Priority Recommendations” related to funding priorities, FTE positions needed, support for particular practices and products (such as agroforestry) and represents a significant amount of work done by a diversity of stakeholders. It is important that the Climate Council consider these recommendations and priorities in relationship to its own goals - as they were identified after substantial work by these communities. For example, increasing the number of FTE service providers for different geographic areas and particular products / practices / advising (ie healthcare) is a very important part of our State’s climate change adaptation and equity strategy as relates to agriculture. We often hear from particular geographic areas in the State which feel underserved as well as smaller farms and farms with more progressive farming approaches which do not feel met by existing expertise or funding sources. The extent to which the Climate Council is able to adequately consider the agricultural needs, and communities’ needs more broadly in VT (even within the context of climate change adaptation and resilience, and GHG mitigation) will likely not be as comprehensive or intensive as the efforts that have gone into researching and articulating the Strategic Plan.
 - We suggest reviewing the work of Jennifer Byrne (White River NRCD), the Schoinier Farm, and others on the drafted [CSP Plus](#) proposal. There are many aspects of this model we support and highlight here - and see it as a more holistic alternative to models which reward farmers for measured improvements in a few select categories (carbon, Phosphorous, etc) on a per acre basis:
 - Some things we appreciate and consider important about this approach:
 - Committed site and farm specific holistic planning and partnerships over time. This allows the conversation to move beyond practices or outcomes, and towards a more strategic and nuanced management involving sequencing, adjusting, projecting, revising, etc. based on the farm itself: it’s soils, its capital, its labor, its infrastructure, its type and scale, etc. It also ensures commitment to a particular period of time from the farm (multiple years), and the committed support of a technical service provider / s and program over that period of time.
 - Base Payment per / participating farm. A base payment helps to bring smaller farms into the fold by offering payment which isn’t exclusively determined by the scale of farm (in terms of payments per acre) and which offers them reasonable incentive to participate.
 - Tiers of payment beyond the base payment. This allows us for a diversity of valuation - from particular outcomes to particular practices, which can be tailored to the farm and improved upon over time. This also allows us to differentiate more between “mitigation” and

“generation” in terms of what types of outcomes and support is being funded and how equitably.

- This complements existing programs which more exclusively fund “infrastructure” such as EQIP (manure pits, digesters, fencing, laneways, etc.)
 - Here is a [report](#) Rural VT, VT Law School, and the White River NRC authored about the first PES WG.
- Guaranteed local markets, and fair prices, as incentives:
- One potential path - which could complement others - that meets the intersection of many needs in the State is guaranteed local markets, at a fair price, as an incentive for farmers. This may not be attractive to all farmers - perhaps for more small and medium scale farmers, for farmers who don't benefit greatly from per / acre payments or other government programs, for farmers who need market access and a fair price at the scale of production they are comfortable with. We know that land and market access are significant barriers to entry for farmers, in particular young farmers and historically marginalized communities. We know that nearly 1/3 of VTers have faced food insecurity throughout the pandemic, and that access to local food is limited for folks with less economic privilege. We have youth in our State's schools, patients in our State's hospitals, and others in our State's institutions who would benefit from more access to locally produced foods. Locally produced food means fewer miles travelled in distribution benefitting the climate and lessening other environmental impacts. There is potential for a program which would coordinate local farmers who qualify based on environmental standards into a system in which they would be guaranteed a particular amount of product is purchased, at a fair price (for example, money supplementing the reimbursement rates for schools in the commodity food program such that they can offer fair prices to local farmers), over a particular period of time. Government guaranteed markets such as this have existed, and do exist in parts of the world. This has the potential to be both highly customized for local institutions as well as for local farmers. It is worth considering that there may be many farmers who would be willing to grow more - and people who would have easier access to beginning a farm - in a responsible and ecologically generative way, if they were able to find a market and a price point which works.
- Limit multinational corporate farmland and forestland ownership; and divest from corporate farmland acquisition
- We face unprecedented concerns related to corporate farmland (and forest land) acquisition in the US and across the Globe as noted in our earlier comments about TIAA / Nuveen and the State of VT's investment of pension funds in this company. This threatens food and resource independence and sovereignty - it is a direct and proven threat to equity in terms of access to land, human rights, and the future of the decision making about how local communities decide to be in relationship with their land. It is also a proven threat to water, air, and soil health.
 - We do not know if there are any particular policy options for limiting corporate land acquisition in VT that we would recommend at this time - but we do recommend that it be explored, and know that Francine Miller at VT Law School has done some research on this topic. There are states such as N. Dakota which have policies in place which ban foreign corporate ownership of agricultural land. We think it is important that any law banning corporate ownership not be xenophobic in its intent or outcome.
 - See earlier notes on TIAA and VT Pension Investment Committee with respect to the need for the State to divest from Corporate Farmland Acquisition, and why this needs to be a critical aspect of VT's Climate Plan. *If VT is investing in real and potential climate and human rights abuses in other parts of the country and / or world, it is imperative that we accept responsibility for those outcomes of our investments in our Climate Plan: from the GHG Emissions Inventory, to the recommendations for action. Not doing so places a disproportionate burden on local businesses and actors who - in an adequate analysis - do not share the primary responsibility for pollution and GHG emissions (nor inequity) and it reinforces the narrative that individuals and small businesses bear more responsibility for changing their behavior than the primary multinational corporations and extractive industries which bear most responsibility for climate change and inequity.*
- Facilitate Long Term, Secure, Land Access and Conservation

- More people - in particular BIPOC community members - having long term, secure, access to land is critical to achieving our collective food and resource security, climate change adaptation and resilience, and broader goals around equity. We NEED more people who understand these skills, who have these relationships, who can teach others, who have the opportunity to make just livelihoods with small scale agricultural, forestry, and craft businesses rooted in our working lands and traditional ecological knowledge.
- It is critical to continue to preserve land from development and speculation - and to conserve it in ways in which it is accessible, and encourages innovative means of housing, cooperatives, etc.
- Land and housing needs are intimately tied together - and different communities have particular needs based on their culture, their power / privilege, etc.
- See Briefs in the Strategic Plan related to land access, alternative land access and ownership, etc.

- Support Urban Agriculture and resiliency in VT
 - Resiliency, adaptability, equity are all involved in strategically increasing our support for urban agriculture and land access in VT. Urban agricultural initiatives must be defined and included in our definition of farming such that they are not excluded from potential funding opportunities, technical assistance, and more. VT's urban areas are typically far less dense than urban areas in other parts of the country - so we must adopt a definition which is appropriate to VT and which facilitates it receiving equitable support. They also require particular service support with considerations related to access, soil contamination, transportation, etc.
 - This involves the conservation and organization of mixed use-spaces which may accomplish agricultural, recreational, and conservation purposes (among others) in and around urban areas and village centers.
 - There is also the opportunity to strategically locate food processing and storage infrastructure in urban environments for gardeners, farmers, and community members in which they are otherwise a challenge to access.
 - Public transportation access to urban agricultural sites and resources is critical. Access to the ability to grow food, medicine, flowers, livestock, and more is also a matter of equity, of mental and physical healthcare, of the development and ongoing dispersal of agrarian knowledge and relationships.
 - New Farms for New Americans in Burlington is a great example of an entity collaborating with a substantial number of people from a variety of different backgrounds (cultures, languages, food traditions) who are producing significant amounts of food on very small plots of land. At a recent event there, we heard about the importance of these gardens culturally, economically, and socially from the people who garden there. We heard about their desire for more access to land, infrastructure, storage, tools and equipment, public transportation access to the gardens, as well as housing connected to land and more.
 - In the context of climate change and equity, access to land for non-commercial agriculture, forestry, crafts, etc. is also important and often undervalued. Incentivizing and facilitating small scale, local food and medicine and fiber, etc. production - non-commercial, subsistence, gift, and edging into commercial - is also a critical aspect of a more equitable and climate adaptable Vermont.

- The Taxation and Regulation of Recreational Cannabis
 - The coming recreational cannabis industry in VT stands to significantly impact our GHG emissions, as well as water demand, electricity demand, and demand on "commercially" zoned areas of VT. It also has significant equity implications in terms of who will now benefit in relation to this legal industry given the racialized and class based nature of the "War on Drugs" and the broader context of systemic racism in VT and the United States.
 - Rural VT is a member of the VT Cannabis Equity Coalition, which advocates for a recreational cannabis industry in VT which is racially just, economically equitable, agriculturally accessible, and environmentally sound. We highly recommend that the Climate Council support our coalition's recommendations for the Cannabis Control Board as well as the Legislature as it revisits Act 164 in the 2022 session. Currently, the law will make it extremely difficult to grow cannabis outdoors, and on farms - it will direct almost all production to occur indoors as cannabis is considered a "commercial", and not an "agricultural" product. As we have seen in CA, CO and other States which have recreational markets - indoor cannabis production has

significant water, electrical, facilities, ventilation, and other environmental costs. Current law facilitates and furthers urban sprawl by requiring plants which could be placed in the ground, alongside other cultivated goods on our farms, to be planted in buildings in commercially zoned areas (which are primarily our towns, cities, and village centers). Equity with respect to a scale appropriate licensing structure, affordability, and access are currently not defined legislatively - yet inequity is framed with the legislative language which explicitly spells out the rules for the existing dispensaries (all owned by multi-state operators).

- Food System infrastructure
 - Strategically located, local, regional infrastructure related to food processing, land cultivation and maintenance, food storage, forestry needs, etc. Covid has provided us a lived experience of systems disruption on a global scale - and it has significantly affected demand for local and regional food system infrastructure (such as livestock slaughter and processing facilities) and people's ability to access it.
 - The State must consider what types of infrastructure are most important to a localized and regionalized food system in the era of climate change, and a future which promises long term power outages, unpredictable weather and seasons, increased climate migration, lack of access to existing facilities, supplies, and resources.
- K-12 core educational requirements on agroecology, ecological literacy, and Traditional Ecological Knowledge.
 - The State must also consider the types of social, educational, and knowledge infrastructure it needs to support in its populations in order to be prepared for the promises of climate change.
 - We recommend K-12 core educational requirements related to agroecology, ecological literacy, and traditional ecological knowledge. This education cannot happen in schools, and partnerships with local farms, communities, organizations and businesses is critical to this effort in order to bring people into the real context of these skills, livelihoods, and basic human and community needs and relationships.
 - Currently, agriculture and many land-based skills and relationships are not popularized in media, they are not valued as core parts of our educational system, and they do not promise viable economic or cultural opportunities for youth. This complex of devaluing these trades and agrarian livelihoods and lifestyles is deeply complicit in facilitating a culture which perpetuates climate change and inequity.
- TA and funding distributed more equitably geographically, and more equitably based on scale and type of farm.
 - This has been discussed in previous points.
- Economic and Financial Adaptation to Climate Change and supporting Equity
 - Divest the VT State Fund from TD Bank and its Enbridge Line 3 Pipeline project which compromises climate, environment, water supply and indigenous rights and sovereignty
 - Establish a VT State Bank. See this [video](#) (funded by USDA Rural Development) about the North Dakota State Bank, established by farmers.
 - The VT Pension Investment Committee divest its \$100 million investment in TIAA's global farmland subsidiary Nuveen
- Invest in our rural areas, small towns, and public transit as an approach to reduce the transportation GHG emissions which constitute such a significant factor in the existing GHG Inventory
 - The opportunities for work near where we live in VT, the opportunity to run a successful local business, the ability to compete with larger businesses and online retailers are significant challenges which contribute to people's needs to drive as much as we do. How can we strategically invest in our rural communities and villages, in our small businesses, in our public transit to support people not *needing* to travel long distances to work, school, to purchase groceries, to enjoy entertainment, or find agricultural supplies, etc.
 - Electric vehicles - even with incentives - will be extremely challenging for most people living in Vermont to afford. We do not dismiss this effort - but we suggest that there are root causes of our reliance on transportation which must be addressed, and which also address equity, climate resilience, and the affordability of living in Vermont.

- Universal Publicly Funded Healthcare in the State of VT, and other State funded social needs (childcare, higher education, etc.)
 - This is the #1 goal of the Healthcare Brief in the Ag Strategic Plan. This Brief highlights how the cost of healthcare in the US is more expensive, less accessible, and has worse outcomes than our peer nations. The State Auditor has recently also released a report documenting the failures and costs of One Care.
 - Ag and ecosystems includes the people within them - we need social welfare program advocacy here, from this sub-committee, and from sub-committee. We know that having our basic needs met is critical to moving beyond those needs to others, and that the cost of meeting these needs affects our ability to afford other needed things in our lives - which may include improving our farming practices. Universal access to quality childcare, eldercare, higher education are all important for adaptation to climate change as well as our equity goals.

- Appropriate Implementation of the Organics Hierarchy in the Universal Recycling Law, and the Prioritization of the Local Use of Organic Materials
 - As we transition to universal recycling of organics in Vermont, there is a hierarchy articulated in law which is not currently being implemented and which a number of organizations are working to have appropriately implemented. There are opportunities to create more soil here, from materials gleaned here, and to not truck organic materials out of State or to use them in ways which may further microplastics contamination.
 - See Caroline Gordon, Rural VT, caroline@ruralvermont.org