

William Moore,
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Senator Robert Hartwell, Chair
Senate Natural Resources & Energy Committee

Attention: Katie Pickens, Committee Staff

As the Committee has scheduled a vote Tuesday morning on S.100, An Act Relating to Forest Integrity, it appears that Vermont Farm Bureau will not be appearing before you this week. I wanted to let you know that the VFB Legislative Committee will be meeting Tuesday morning to discuss, among other subjects, S.100.

We would reiterate our position that the bill has not been sufficiently vetted either for its intended goals or likely consequences. As we support AMPs (Vermont's Acceptable Management Practices) as the best method to evaluate whether a timber harvesting operation conforms to environmental quality standards, road construction in any sized parcel should be a function of AMP based planning and decision-making. The Act 250 process cannot provide a suitable substitute for that. The bill is clearly not able to discern "solely for forestry purposes" in any meaningful way and will likely lead to years of review, appeals and litigation if signed into law. The concept of any road being restricted by fiat to "solely for forestry purposes" in order to maintain compliance as an exempted activity raises all sorts of monitoring and verification issues for local officials and Department of Forest, Parks & Recreation personnel.

We also believe that forest management plans should provide for multiple uses on virtually all lands where feasible. Under the bill, multiple project partners, with multiple usage goals, with multiple ownership partners, would be hard pressed to understand and evaluate future projects without clear statutory language that precludes lengthy and costly appeals. It should be clear from the recent experience of VAST and the Lamoille Valley Rail Trail that Act 250 can be utilized for delaying otherwise well supported multiple use developments. Offering a costly mitigation option to the Environmental Board decision makers merely highlights the likelihood that this statute will invite only the highly financed to navigate the process under the bill's proposed language.

We simply urge further and detailed scrutiny of the far-reaching silvicultural, economic, recreational and other implications of S.100. I will contact you further if necessary to update the Committee on our discussion Tuesday.

Thank you for your attention in this matter. Please feel free to contact me at this email or by phone at (802) 888-9390.

Sincerely,

William (Bill) Moore,
Legislative Director / County Organizer
Vermont Farm Bureau