

Written comments to the House Committee on Government Operations regarding H.355 (forester licensing and regulation) as introduced to the House on February 27, 2015

Submitted by the Green Mountain Division of the Society of American Foresters
April 8, 2015

The Green Mountain Division of the Society of American Foresters (SAF) represents about 125 foresters practicing forestry in a wide range of capacities, including private industry, state and federal government, academia and non-profits. Our Division supports rigorous forester credentialing programs as implemented by professional organizations such as SAF and/or through state-level forester licensing and mandatory registration requirements.

- We support the principles of H. 355 and welcome forester licensing in Vermont. We believe forester licensing is good for the profession, the public, and the environment.
- We are pleased to see existing SAF content and standards integrated into the bill, including the SAF Certified Forester exam and Certified Forester experience criteria.
- We urge you and the Office of Professional Regulation (OPR) to continue to work with SAF, particularly the Green Mountain Division, to finalize this legislation and enact related regulations.
- Forestry is a very diverse field and every forester has a different approach to their job. The highly varied nature of forests means that there is not one acceptable approach for any one forestry task. There are likely dozens and most may be acceptable. Good forestry is very difficult to define and is open to interpretation. We stress the importance of the Director working closely with the advisors appointed by the Secretary of State and the forestry community to put in place a solid framework so that forester licensing is effective at reducing poor forestry, and does not simply become a hoop to jump through that does not benefit the Vermont landscape.
- The Green Mountain Division looks forward to working as a partner with the State.
- The Green Mountain Division has identified a number of opportunities to strengthen the current draft of H.355, and looks forward to providing more detailed comments related to content at a future date.

Below are two opportunities for content modification or clarification in H.355 as introduced. As stated, we feel there are additional opportunities to strengthen forester licensing and look forward to providing more detailed additional comments related to content at a future date.

- **Exemptions:** (§ 4904, (3)) (Page 4, lines 16-21)
 - Requiring the supervising, licensed forester to be “on-site and present” and “immediately available to the person being supervised” is impractical and unnecessary.

- The phrase “forest practices” is used in this provision but is not defined in the bill. What constitutes a “forest practice” that an unlicensed forester needs to be directly supervised while executing? Surely marking timber is a “forest practice” but what about inventorying regeneration, flagging water bars on a skid road or refreshing boundary paint. The phrase “forestry services” is defined in §4902 (4)(A). Perhaps “forestry services” should be used in place of “forest practices”.
- **Qualifications:** (§ 4921, (1)) (Page 6, lines 13-15)
 - Experience is essential to effectively practicing forestry. Simply having a degree and passing an exam does not mean that someone knows how to be a forester. A set number of hours of experience should be required before a full forestry license can be obtained.

Respectfully submitted on behalf of the Executive Committee of the Green Mountain Division of the Society of American Foresters by:

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