

ASSOCIATED INDUSTRIES OF VERMONT

REPRESENTING THE VERMONT INDUSTRIAL AND BUSINESS COMMUNITY SINCE 1920

Comments on AMP Provisions of H. 35

February 4, 2015

House Fish, Wildlife, and Water Resources Committee

Submitted by William Driscoll, Vice President, AIV

AIV appreciates the opportunity to provide comment on Sections 32 through 36 of Draft 1.2 of H.35 before the Committee.

The forest products sector is an important segment of AIV's membership and the Vermont economy, and AIV has a long standing interest in the high quality of forestry practices in Vermont. Indeed, AIV has for many years provided administrative support for the Vermont chapter of the Sustainable Forestry Initiative, the largest and most comprehensive program in North America dedicated to the continuous improvement and promotion of sustainable forestry practices and related initiatives.

Accepted Management Practices have provided valuable guidance for logging and related activities in Vermont. One of the values of the AMPs and their use, however, has been their function as guidance rather than strict mandate. Even the best guidelines will not necessarily fit perfectly to every situation. Reasonable flexibility has allowed logging to be performed in Vermont to high professional and environmental standards, and we do not believe that there has been any demonstrated problems with straying from AMPs such that amending the underlying statute is warranted.

In addition to creating practical problems with attempting to apply AMPs strictly to situations that might not be optimal, the inevitable conflict between "the perfect and the good" could lead to enforcement or litigation issues whose cost and other negative impacts are simply not justifiable.

In short, forestry practices in Vermont are meeting high standards, there is no demonstrable need to amend the statute as proposed in these sections, and doing so could have negative consequences. We therefore respectfully urge the Committee to delete Sections 32 through 36 from Draft 1.2 of H.35 currently before the Committee.

Thank you again for considering these comments. Please do not hesitate to let us know if you have any additional questions or otherwise wish to discuss this legislation further.