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enWood Resources, LLC

"Sustainable Forestry Specialists"

To the Commission on Act 250:

My name is Grahm Leitner. I own and operate a forest contracting business, Vermont GreenWood Resources, LLC. The majority of our work includes forestry and logging services for small private and municipal forested properties in Chittenden, Washington, and Addison counties. I recently purchased a former sawmill, log yard, and maintenance shop in Duxbury, VT. This project was partially funded through the Working Lands Program as a way to stimulate the rural forest economy. As part of the purchase and continued operation of the site, I was required to update the Act 250 permit for the property. This process involved environmental consulting, engineering, stormwater and waste water permitting, and establishing operational constraints for the property. The cost I incurred for the complete permitting process was \$30,000, which was partially paid for out of my operating budget and partially through the Working Lands Initiative.

However, the curious thing about the process is that relatively little changed from the property's original and and historical use. It has always been a secondary wood processing facility, ever since it was developed. Currently, I am using the site to process firewood, and log storage and sawmilling are also permitted. Operating hours were also established, which limit my activities to week days 7am-5pm and Saturdays 7am-12pm. One aspect of forest products businesses that should have been better taken under consideration, is that much like a farm, forestry businesses need to be able to operate around the clock. If trucks are going to come to the yard to drop off or pick up logs or other products, it is likely that there will be conflicts with those hours. For example, if I wanted to start producing wood chips for local school districts and municipalities, most of those potential clients have strict delivery hours, which are after the work and school days have ended. It would be impossible to expand into these markets because we would not be able to run a chipper or have trucks in the evening. Also during the spring mud season, truck traffic is limited due to weight limits. This creates a situation where we simply cannot earn income from the property for a period of about 2 months. I know first hand that town road management has a tremendously negative impact on forest products businesses. Leaving weight limits up to local road formen creates a patchwork of divergent regulations that no business can successfully navigate. Imagine having to get permission from 3-4 town road foremen to haul each load of wood to its destination. That could amount to 8 or more phone calls per day for a typical contractor, and if one person denies that permission, your whole day is unprofitable. This period typically lasts from the beginning of March until mid-May. That is 40 or 50 working days per year that have a very high chance of being unproductive. A modern forest products business with high levels of investment cannot sustain itself under those conditions.

My main complaint with the Act 250 process is that it is expensive. I really have a hard time understanding and accepting why I had to pay \$30,000 for a box of paperwork that basically says I can

keep operating the site as it has been for 30-40 years, abeit with a few more constraints. I could have used this money to invest in further value-adding processes for the site, or hired an additional employee to manage wood flow into the site. Those are aspects that would benefit the forest economy. As it is, I feel a bit like the Act 250 process only seeks to limit the forest economy. I think placing greater value and less monetary constraints on the forest products and processing industry would be valueable for both the forest products industry and for forest landowners. If the goal of Act 250 is to keep working lands working and limit development, then the forest industry is a key player in that because we also seek to keep forests as working forests, as they are our livelihood.

Please consider revisions to Act 250 that would lessen the financial burden on forest product businesses and support an industry that, by nature, works to further the same goals that Act 250 does.

Sincerely,

Grahm Leitner VT Licensed Forester #148.0124548

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