

Dear Members of the House Committee on Natural Resources, Fish and Wildlife,

I am writing today to humbly thank you for the opportunity to share my testimony on Wednesday as you review proposed revisions to the Use Value Appraisal program.

I am also submitting three additional points to consider, in response to information presented after my testimony.

1) Julia Richter from the Vermont Legislative Joint Fiscal Office made mention in her testimony that overall GDP for timber has gone down, and should be considered in the cost of the program. I would like to point out that GDP contributions from forest recreation, tourism, water quality and watershed management (especially hazard mitigation) non-timber forest products such as medicinal plants, and carbon sequestration should be considered in the context of the addition of a reserve forestland enrollment option. I am well aware that financial analysis has many complex layers, and that integrating additional input is easier said than done. Nonetheless, I think it is a relevant consideration on the fiscal impact of this bill.

On my 545-acre parcel, as I alluded to in my testimony, carbon sequestration, ecological tourism, and forest recreation provide regenerative and continual income, year after year, that outpaces the potential revenue of timber extraction. Neighbors of mine have robust non-timber forest product operations, from foraged materials for the arts and craft industry to the production of wild-simulated ginseng and goldenseal for the nutritional supplement industry. Both of these operations contribute far more to the GDP, and contribute continually each year, than logging on either parcel. For many forestland parcels, logging provides a finite and interrupted revenue stream that is not recurrent annually. These additional industries can provide economic input that may be worth including in financial analysis of these changes.

I should further mention that the carbon sequestration market is in its infancy in the state of Vermont, but is likely to see significant growth in the next five years.

Finally, with our state's recent experience of flooding, and acknowledging the indirect yet clear benefit of forests on prevention of flood damage, I believe there is a place in financial analysis to understand these implications. The UVM study I referenced in my testimony examined the potential economic cost of floods through the next 100 years in Vermont. Using a new mapping tool, it projected baseline costs of \$2.13 billion in property damage in the Winooski River basin. Researchers also found that, when climate change was added to the analysis, the damage total increased to \$5.29 billion. I implore the committee to carefully review the findings of this study as it discerns the modifications it will advance for the UVA program, with specific analysis of the potential financial impact our state will endure if we fail to prioritize ecosystem restoration as a form of flood hazard mitigation in the face of climate change.

2) Commissioner Snyder referenced that 8,000 parcels representing 860,000 acres would have the potential for exemption under the current version of the proposal. I referenced page 26 of the FPR report, which states: *"...about 30% of UVA eligible parcels and forestland (among currently enrolled and not enrolled, eligible parcels) could be managed for old forest and would be eligible for enrollment in this category. Those lands eligible for enrollment in Reserve Forestland would be those that exhibit site features that prevent management for forest*

*products or provide a strong ecological (or appropriate historical/cultural) basis for managing for values other than sawtimber. All UVA-eligible forestland would continue to be eligible to be managed for sawtimber, and about 70% of parcels would need to be managed for sawtimber at some scale..."*

I have also reviewed multiple instances of testimony from the Commissioner and others since his statement, and consulted numerous colleagues familiar with the proposed changes. From this research, it is my understanding that the actual number of eligible parcels, both currently enrolled and new, under the current FPR proposal would be closer to 4200-6000 parcels. The Wild Forests Vermont report, provided to the committee earlier this month, outlines a number of scenarios and quantifies potential parcel eligibility under each. As we have all acknowledged, determining how many current or new enrollees will choose this new designation is certainly an act of divination with the crystal ball. No matter the case, I believe 4200, 6000, or even 8000 parcels is far below the state's urgent need at this time to protect intact forest ecosystems, and that the strongest potential for aligning the new revisions with the stated mission of UVA from the 1980 statute of **protecting public health, safety and welfare** is to open a new reserve or wild forest category within the UVA program to ALL eligible forests over 25 acres.

3) I implore the committee to acquire more details about how UVA uses VCD data, per Commissioner Snyder's assertion at the end of the hearing. As a landowner, I attempted to integrate my VCD designations such as highest priority forest block and was instructed by my consulting forester and county forester that there isn't really a place for inclusion of these classifications in the UVA schematic. The only way I observe a meaningful integration of VCD analysis is the determination of ESTA. For my 545 acre parcel with so many VCD designations and rare or threatened species, the overlap of VCD and UVA only addresses 2 acres - or 3/10 of one percent of my total acreage.

Many agencies in this state rely on VCD data for decision making, as do many municipal bodies. It seems quite obvious to me in this current discussion of a potential wildland option in UVA, that at minimum, UVA could follow VCD maps of highest priority areas and allow landowners within those designations to opt to enroll as wild forests rather than timbered forests. As a landowner, a municipal official, and a former member of the UVA program, I am interested to know how Commissioner Snyder currently implements VCD into its planning on private or public lands, or how they propose to incorporate its data analysis in the current version of the proposed program revision. I appreciated Representative Dolan's insightful inquiry on this matter and I encourage the committee to request further clarification from FPR on how VCD data is utilized within UVA.

Thank you again for reviewing this important legislation and considering its impact on the public safety, health and welfare for Vermont residents of today and future generations.

Respectfully,  
Emily Ruff