



June 18, 2026

Ms. Julie Moore, Secretary
Vermont Agency of Natural Resources
Ms. Danielle Fitzko, Commissioner
Vermont Department of Forests, Parks and Recreation
Jason Batchelder, Commissioner
Vermont Department of Fish and Wildlife
Ms. Misty Sinsigalli, Commissioner
Vermont Department of Environmental Conservation
1 National Life Drive, Davis 2
Montpelier, VT 05620-3801

Submitted via email, ANR.StateLandsPlanning@vermont.gov

Re: Standing Trees' Comments on Proposed Rule 26P010

Dear Secretary Moore, Commissioner Fitzko, Commissioner Batchelder and Commissioner Sinsigalli:

Standing Trees submits the following comments on the proposed Lands Management Planning Rule, Proposed Rule 26P010.

Standing Trees is a grassroots-membership organization that works to protect and restore New England's forests, with a focus on public lands in Vermont and New Hampshire. Standing Trees works to ensure that New England's public lands are managed using just and equitable policies and practices that support the region's residents and natural ecosystems. Standing Trees promotes managing public lands and waters to safeguard the region's native biodiversity; improve public health; contribute to flood and drought resilience; maximize carbon uptake and storage; and maintain clean water and clean air. The Executive Director of Standing Trees, attorney James A. Dumont, and the Environmental Advocacy Clinic at Vermont Law and Graduate School submit these comments on Standing Trees' behalf.

In brief, as set forth in more detail below, Standing Trees submits that:

1. The rulemaking process thus far has unlawfully deprived the public of economic, environmental, and scientific information about the proposed rule that is essential

to meaningful public participation in the rulemaking as guaranteed by § 838 of the Vermont Administrative Procedure Act (APA).

2. The proposed rule itself suffers from a pervasive anti-public participation bias. The rule *could* guarantee that important decisions about use of the public's forest lands will be based upon publicly disclosed information, that the decision-making process will be transparent, and that these decisions, once reached, will be made publicly available. Instead it continues the status quo. In the rule, as now, ANR claims an entitlement to gather data that is not shared with the public, make some of the most important decisions about state forests, parks, and wildlife management areas based upon that nonpublic data in meetings that are held behind closed doors, and then disclose these critical decisions only to members of the public who make Public Records Act requests.
3. The proposed rule does not require consideration of the greenhouse gas emissions resulting from its decisions, in violation of part of the Global Warming Solutions Act, 10 VSA §§ 578(c) and 592.-593
4. The proposed rule unlawfully ignores the Public Trust Doctrine, including the legally required analysis of the effects of the agency's decision on the state's waters and the essential element of public participation in those decisions.
5. The proposed rule arbitrarily excludes important land management sub-classifications for Highly Sensitive Management Areas, including for passive restoration of old forests, flood mitigation, water quality protection, and carbon storage.

Standing Trees submitted detailed comments in November of 2024 on a public, informal draft of the proposed rule. Most provisions remain unchanged. Rather than repeat those comments here we attach that comment letter and incorporate it by reference, which apply with equal force to the current proposed rule. We submit additional detailed comments below. We also attach and incorporate by reference reports from Key-Log Economics, Professor William Moomaw, Ph.D., and FB Environmental.

1. The rulemaking process thus far has unlawfully deprived the public of essential economic, environmental, and scientific information about the proposed rule

Section 838 of the Vermont Administrative Procedure Act reads in relevant part as follows:

(a) Filing; information. Proposed rules shall be filed with the Secretary of State in a format determined by the Secretary that includes the following information:

...

(2) An analysis of economic impact.

(3) An analysis of environmental impact.

...

(8) A brief summary of the scientific information upon which the proposed rule is based, to the extent the proposed rule depends on scientific information for its validity. The summary shall refer to the scientific studies on which the proposed rule is based and shall explain the procedure for obtaining such studies from the agency.

(b) Economic impact analysis; rules affecting small businesses and school districts.

(1) General requirements. The economic impact analysis shall analyze the anticipated costs and benefits to be expected from adoption of the rule. Specifically, each economic impact analysis shall, for each requirement in the rule:

(A) list each category of people, enterprises, and government entities potentially affected and estimate for each the costs and benefits anticipated; and

(B) compare the economic impact of the rule with the economic impact of other alternatives to the rule, including having no rule on the subject or a rule having separate requirements for small businesses.

(c) Environmental impact analysis. The environmental impact analysis shall:

(1) Analyze the anticipated environmental impacts, whether positive or negative, from adoption of the rule. Examples of environmental impacts include the emission of greenhouse gases; the discharge of pollutants to water; and effects on the ability of the environment to provide benefits such as food and fresh water, regulation of climate and water flow, and recreation.

(2) Compare the environmental impact of the rule with the environmental impact of other alternatives to the rule, including having no rule on the subject.

Economic impact

ANR's filing with the Secretary of State's office includes an economic impact discussion—but the agency's so-called "analysis" is arbitrary, capricious and unreasonable. It states that the rule will have no economic impact because the rule simply codifies existing decision-making procedures. This wrongly assumes that present practices have no economic impact, but they do.

ANR's present decision-making practices fail to consider impacts with potentially enormous economic consequences, and the rule codifies those failures. We attach a report from Key-Log Economics that explains the economic impact of those existing practices and

the proposed rule. Adoption of the rule in its present form could cost Vermonters hundreds of millions of dollars, annually.

Unless and until the rulemaking process is re-started so that the public has the benefit of an economic impact analysis, the rulemaking process is unlawful.

Environmental impact

ANR's filing with the Secretary of State's office includes an environmental impact discussion, but again the agency's so-called "analysis" is arbitrary, capricious and unreasonable. It states that the rule will have no environmental impact on state lands—again because the rule simply codifies existing decision-making procedures and because land use impacts will be considered later, when the procedures are utilized. This wrongly assumes that present practices have no environmental impact, but they do.

For example, present practices include decision-making that fails to take into account the effect of timber harvesting on flood resiliency. The proposed rule retains this defect—flood resilience isn't even mentioned in the rule. Future ANR decisions about timber harvests could be 100% in compliance with this rule while wholly ignoring impacts on flood resilience. Standing Trees commissioned a report that investigates the inadequacy of present ANR management practices on state lands (including the Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont), for protecting water quality and for increasing Vermont's flood resilience.¹ We attach that report. No reasonable Vermonter, in 2026, would assert that impact on flood resilience is not an environmental impact that the State of Vermont should consider when deciding where and what timber on publicly owned lands to harvest and under what conditions. Reduced flood resiliency is also an impact with severe economic impacts. ANR is fully aware of the conflict between timber harvest and flood mitigation.² The purpose of this rule is to help ANR make scientifically, economically, socially, and legally-informed decisions between such competing interests. Without such a decision-making framework, ANR's decisions often arbitrarily prioritize one

¹ "Acceptable Management Practices: A review of Vermont logging practices and their effects on water quality and flooding." FB Environmental Associates. August 2025.

² A records request conducted by Standing Trees revealed internal communications between ANR staff that "the Hydrologic Reserve Zone [(a recommended land management classification from a 2015 report contracted by ANR, "Enhancing Flood Resiliency of Vermont State Lands")]] is significant and would drastically increase the acreage of Highly Sensitive Management Areas in our LRMPs. I would guess that 60-70% of Camel's Hump [Management Unit] would be classified as Hydrologic Reserve, and thusly, highly sensitive LMC." See attached screenshot entitled "ANR Staff Communication re Hydrologic Reserve Zones and HSMAs.png."

set of values (timber harvest), over others. The attached report from FB Environmental investigates the impacts of timber harvest on flood resilience.

Greenhouse gas impacts are another environmental impact that is ignored. Present practices, however, do not account for greenhouse gas emissions from state land management decisions; indeed, we are not aware of a single plan- or project-level decision that has calculated carbon emissions from anticipated or proposed actions.³ Present climate-focused practices are explicitly justified by ANR's detrimental and scientifically invalid position that logging should be used to remove mature and old stands and replace them with young stands for the purported benefit of carbon sequestration, even when this is done at the expense of ongoing carbon sequestration and long-term carbon storage (as well as biodiversity, water quality, flood resilience, recreation, and other resource values). See, for example, ANR's response to comments on the Worcester Range Management Unit Long Range Management Plan, at page 309. Professor Moomaw's report, attached, addresses this fallacy.

Regardless of the merits of ANR's positions, the Vermont APA does not authorize ANR to sweep scientific debates under the rug by saying all it is doing is codifying existing practices. The APA requires that the impacts of issuing a rule that continues existing practices must be evaluated now, *in the environmental impact analysis for that rule*. And under the proposed rule, there also will be no environmental impact analysis later. If the rule goes into effect as is, ANR will follow its unexamined and invalid scientific positions that have not received public scrutiny and will continue its harmful forestry decision-making without conducting the review that the statute requires. The statute also requires that alternatives to existing practices must be identified and evaluated. The attached reports by FB Environmental and Professor Moomaw present such alternatives.

The scientific information upon which the proposed rule is based

Section 838(a)(8) requires a brief summary of the scientific information on which the proposed rule is based. ANR repeatedly finds there will be no environmental impact because the rule is just codifying existing practices, but does not provide the scientific basis for its existing practices. ANR is defying the explicit command of the legislature. The scientific basis for the existing practices being codified needs to be shared with the public so that the public, if it disagrees with the presented basis, can submit comments with additional scientific information that may challenge and undermine the validity of ANR's

³ Such an analysis is feasible at multiple planning levels and scales. The USDA Forest Service published an analysis of anticipated carbon emissions for the Telephone Gap Integrated Resource Project in the Green Mountain National Forest in June 2025 (see Section 3.4, "Carbon and Greenhouse Gas Emissions"). Available for download at: <https://usfs-public.app.box.com/v/PinyonPublic/file/1895304596991>.

scientific positions. Then and only then should ANR decide whether to go forward with codification of existing practices.

2. The proposed rule itself suffers from a pervasive anti-public participation bias

ANR has asserted to Standing Trees and to the Vermont Superior Court that its unit management plans are not binding; rather, they are just “blueprints” showing possible actions. It has also asserted that its existing practice is, after completion of its unit management plans, to:

- gather data and conduct reviews that are not shared with the public,⁴
- make some of its timber-harvesting decisions based upon that nonpublic data in meetings that are held behind closed doors, and
- then disclose these critical decisions only to members of the public who make Public Records Act requests.

ANR has asserted that it sees no problem with this approach.

The proposed rule explicitly continues this closed-door practice. It states that the Annual Stewardship Plans—where “fine-filter reviews” are conducted and decisions are made—and the project-level decisions highlighted within will not be subjected to any sort of public process.⁵ Only the longer-term plans, what ANR has characterized as hypothetical “blueprints,” are publicly developed.

Standing Trees submits that the rule must guarantee that important decisions about use of the public’s forest lands will be based upon publicly disclosed information, that the decision-making process will be transparent, and that these decisions, once reached, will be made publicly available. All plan and project-level documents and analyses, including supporting information, should be posted clearly on an ANR website. Current practice by ANR is to only make LRMPs available for public viewing; ASPs and project level documentation, if it exists, is only available via records request.

Standing Trees also believes that the report to the Secretary of State is misleading. It fails to inform the public—and the Legislative Committee on Administrative Rules—that if its proposed rule is adopted, the public will be shut out of the decision-making process. The proposed rule in fact provides that ANR will only be required to collect any public input

⁴ At the Burlington public hearing on June 8th, ANR staff stated that Annual Stewardship Plans are when a “fine filter review” is conducted for proposed management actions.

⁵ Section 4.4.2(a) of the proposed rule provides that “The ASP shall be developed by ANR staff and are not subject to public input.”

during unit management planning, which ANR considers merely advisory, and which ANR plans to conduct on a twenty-year rotation, if not longer.⁶

A related section, § 4.1.1, would authorize ANR to issue a list of Universal Management Actions (UMAs) in a Statewide Plan. The rule contains no limits on what can be placed on this list.⁷ According to the proposed rule, a UMA could be *anything* that ANR wishes to do to “comply with existing or new state laws or regulations.” Among other potential applications, the proposed rule allows UMAs to be used indefinitely on any lands that do not have an LRMP,⁸ creating conditions for perpetual reliance on UMAs on a large portion of ANR-managed lands. It is difficult to think of any actions that ANR takes that could not be characterized as compliance with state laws and regulations. The list itself will not be subject to the public disclosure and comment protections of rulemaking. Section 4.1.1 is an exception that has the potential to swallow the entire rule. It is arbitrary, capricious and unreasonable.

Problems with the proposed rule’s Statewide Plan do not end with the Universal Management Actions. Indeed, ANR’s proposal to issue a Statewide Plan separately from, rather than as an integral part of this proposed rule, obscures the environmental and economic impacts of ANR’s proposed rule, and shifts critical decisions about future state land uses to ANR processes that will occur without the transparency and accountability of

⁶ Section 4.2.2(a) of the proposed rule provides that “LRMPs will be developed on an as-needed basis, when management actions other than Universal Management Actions are proposed for a land management unit or a portion of a land management unit. LRMPs will generally be developed for a management period of twenty years. An LRMP that is older than twenty years may be extended at the discretion of the Secretary to complete the management activities approved but not yet implemented within an existing plan.”

⁷ At the Burlington public hearing on June 8th, ANR staff stated unequivocally during the presentation about the proposed rule that “timber harvests” are not Universal Management Actions. During the public comment portion of the hearing, Standing Trees’ Executive Director verbally noted that this statement was not reflected in the proposed rule, and that the rule would be strengthened by including clear constraints or limits on UMAs (such limits could include types of activities, such as timber harvest, or geographic constraints, such as a maximum number of acres per application of a UMA, or a maximum number of cumulative acres that could be approved using multiple UMAs in close proximity). In emails to Standing Trees’ Executive Director on June 11th and again on June 17th, ANR staff admitted that public comments (as well as ANR’s presentation) at the June 8th public hearing were not recorded.

⁸ Section 4.2.2(b) of the proposed rule provides that “LRMPs are not required for any parcel or land management unit where only Universal Management Actions will occur.” As reported by ANR during the June 11th hearing for the proposed rule, only approximately one-third of all ANR management units are presently subject to Long Range Management Plans.

rulemaking, subverting the legislature’s admonition that the Commissioner of Forests, Parks, and Recreation “shall adopt and publish rules in the name of the Agency for the use of State forests, or park lands.”⁹

The Statewide Plan (section 4.1.1 of the proposed rule) will establish (among other potential purposes) a list of Universal Management Actions, Land Management Classification Standards and Guidelines, and Management Goals and Standards, including “an outline of generally applicable management goals for ANR lands consistent with statutory requirements, ANR policy, procedures and guidelines, and other planning efforts as applicable, including focusing on the appropriate balance of all uses, management activities and natural resources; based on the best available science and best professional judgment of ANR staff.”¹⁰ These are fundamental considerations for future land use decision making, and all of ANR’s deliberations will occur outside of the protection afforded by the Vermont APA, with minimal “public engagement and input.”¹¹ In sum, the proposed rule’s design unlawfully segments ANR’s analysis and decision making process, shielding ANR from the legislature’s rulemaking mandate, depriving the public and decision makers of legally-required information and analyses, and leading to future land management plans and actions that may be inefficient, inconsistent, counterproductive, and environmentally and economically harmful.

Finally, the proposed rule deliberately thwarts public participation by excluding entire classes of people from public meetings. For example, for every public meeting required by the proposed rule, only one in-person “informational” meeting is required. This is inadequate. Standing Trees’ 2024 comments requested that ANR mandate at least one virtual meeting (or a hybrid meeting) in addition to hosting an in-person meeting. Such meetings should also include an opportunity to comment verbally or in writing, rather than solely functioning as “informational” meetings.

Providing a virtual or hybrid meeting should be the bare minimum of reasonable public process in 2026, as evidenced by the commonality of remote work (including by state employees), and the frequent use of virtual meetings by state and local governments for committee hearings, city council meetings, and more. Disabled Vermonters, working Vermonters, caregivers, and many others may be unable to participate at in-person public meetings.

Vermont law states that:

⁹ 10 V.S.A. § 2603(c)(1).

¹⁰ Proposed rule at 4.1.1(c)

*A public accommodation shall make reasonable modifications in policies, practices, or procedures when those modifications are necessary to offer goods, services, facilities, privileges, advantages, or accommodations to individuals with disabilities, unless the public accommodation can demonstrate that making the modifications would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations...*¹²

ANR acknowledges the above in its “Disability Nondiscrimination Plan” of March 19, 2026, and also notes that its “Disability Nondiscrimination Values” include “Provid[ing] Access to All.” It further explains that “ANR approaches requests for accommodation with openness and a problem-solving mindset. Even if a request may be challenging to fulfill as initially presented, ANR staff will work collaboratively with the requestor to explore effective and reasonable solutions.”¹³

The Disability Nondiscrimination Plan continues: “When considering utilizing a facility for a short-term purpose such as day-long public events or public meetings, ANR must choose locations that meet ADA accessibility standards. ANR staff may confirm if a facility meets these standards through coordination with the facility’s events or operations manager. If a chosen facility is not accessible, ANR should strive to change the event to a different location to proactively meet the needs of members of the public with disabilities.”¹⁴

Moreover, the Disability Nondiscrimination Plan states that “To support effective communication with members of the public with disabilities, ANR operates their programs, services, and activities using accessible practices and policies. This means actively addressing situational or systemic barriers to access or inclusion in ANR’s practices and policies.”¹⁵ This includes rules and plans developed by ANR.

In sum, it is arbitrary, capricious, and unreasonable for ANR to deny virtual meeting options to the public. Post-hoc video recordings or slide decks do not substitute for active participation in public meetings.

Standing Trees submits that the rule must guarantee that important decisions about use of the public’s forest lands will be based upon publicly disclosed information, that the decision-making process will be transparent, accessible, and provide for public comment

¹² 9 V.S.A. § 4502(c)(5).

¹³ ANR, “Disability Nondiscrimination Plan.” (Mar. 19, 2026), at <https://anr.vermont.gov/sites/anr/files/documents/ANR%20Disability%20Nondiscrimination%20Policy%20and%20Plan.pdf>.

¹⁴ *Id.*

¹⁵ *Id.*

opportunities at every level of planning and project development, and that these decisions, once reached, will be made publicly available.

3. The proposed rule does not require consideration of the greenhouse gas emissions resulting from its decisions, in violation of part of the Global Warming Solutions Act, 10 VSA §§ 578(c) and 592-593

Section 578(c) of Title 10 states that every agency of the State of Vermont “*shall* consider any increase or decrease in greenhouse gas emissions *in their decision-making procedures* with respect to the purchase and use of equipment and goods; the siting, construction, and maintenance of buildings; the assignment of personnel; and *the planning, design, and operation of programs, services, and infrastructure.*” The proposed rule sets forth decision-making procedures for the planning, design, and operation of its programs and services. But, contrary to the statute, it does not mandate consideration of any increase or decrease in greenhouse gas emissions. As discussed above, nor has ANR provided any accounting of the greenhouse gas emissions from the proposed rule itself.

Sections 592 and 593 of Title 10 require that the Secretary adopt rules that implement the Vermont Climate Action Plan by July 1, 2026. Proposed Rule 26P010 is a rule being proposed by the Secretary. The Secretary’s submission to the Secretary of State alleges that the proposed rule addresses greenhouse gas emissions. But the proposed rule does not implement the Climate Action Plan; it does not even mention the Climate Action Plan.

4. The proposed rule does not consider the agency’s Public Trust duties

The Public Trust Doctrine is a common-law rule of law that *independently* governs the State’s management of public trust resources, in a different manner and for different purposes than statutes. The doctrine requires that the State identify and weigh the costs and benefits to the public of decisions that affect public waters—such as the streams, rivers, ponds, and lakes that fall within or are fed by tributaries within state forests, parks and WMAs.¹⁶ Mere compliance with water quality regulations, or Accepted Management Practices (AMPs), or wetlands rules, during timber harvesting decision-making, or during harvesting, does not suffice. As trustee of these resources, the State must base its decision on the overall net benefit or cost to the people of Vermont.

Existing ANR practices do not include Public Trust weighing, because ANR believes that just complying with Vermont statutes and rules (such as wetlands rules) is good enough. It is not.

¹⁶ See generally *City of Montpelier v. Barnett*, 2012 VT 32, ¶ 17, 191 Vt. 441, 49 A.3d 120; Sax, *The Public Trust Doctrine in Natural Resource Law: Effective Judicial Intervention*, 68 MICH. L. REV. 471 (1970).

And, as discussed above, the public participation provisions of the proposed rule are arbitrarily and unreasonably incomplete. The Public Trust doctrine requires that state notify and solicit feedback from the public before it makes any decisions to impair the public's interest in public trust resources.¹⁷ The proposed rule fails to do so, including for the extensive decision-making about public lands that that it expressly shields from such public transparency and review.

Codification of ANR's existing practices will codify and allow ANR's shirking of its Public Trust duties to continue into the future.

5. The proposed rule arbitrarily excludes important land management sub-classifications for Highly Sensitive Management Areas, including for passive restoration of old forests, flood mitigation, water quality protection, and carbon storage.

ANR's Vermont Conservation Design (VCD) "sets defined quantitative and distributional goals for maintaining and restoring an ecologically functional landscape."¹⁸ VCD describes the following "ecological functions" of old forests in Vermont:

"Historically, the vast majority of Vermont's landscape was old forest, and it is the original habitat condition for many species. The state's native flora and fauna that have been here prior to European settlement are adapted to this landscape of old, structurally complex forest punctuated by natural disturbance gaps and occasional natural openings such as wetlands or rock outcrops. The complex physical structure of old forests creates diverse habitats, many of which are absent or much less abundant in younger forests.

*"As a result of the persistent structural and vegetative complexity above ground and the diverse biome belowground and associated complex biotic and abiotic relationships that develop over time, old forests also protect water quality, and sequester and store carbon, provide opportunities for adaptation of species and community relationships to climate and other environmental changes, and an ecological benchmark against which to measure active management of Vermont's forests."*¹⁹

Importantly, VCD notes that "[a]lthough there are small patches of old forest scattered around the state, old forest is absent in Vermont as a functional component of the landscape. **In most forests, passive restoration will result in old forest conditions.** In

¹⁷ Sax, *supra*, at 531.

¹⁸ Zaino et al 2018. "Vermont Conservation Design, Part 2: Natural Communities and Habitats Technical Report." Vermont Agency of Natural Resources.

¹⁹ *Id.*

some cases, active forest management may be beneficial to promote forest composition and structure suitable for subsequent passive restoration” [emphasis added].²⁰

Act 59 sets mandated goals for old forest restoration in Vermont, and establishes Ecological Reserves as the primary land conservation category for management that facilitates old forest protection and recovery. Act 59 defines an Ecological Reserve as “an area having permanent protection from conversion and that is managed to maintain a natural state within which natural ecological processes and disturbance events are allowed to proceed with minimal interference.”²¹

The Act 59 “Conservation Categories Workgroup,” comprised of ANR staff and experts from the public, was convened to help complete the Act 59 Phase I Inventory. The Workgroup’s report emphasized that “Ecological Reserve Areas may be in any current ecological condition, including a highly-degraded condition,” and it noted that ANR “Highly Sensitive Management Areas” (HSMAs) are examples of Ecological Reserves.²²

Nevertheless, the proposed rule does not contain a Land Management Classification (LMC) 1.0 (HSMA) sub-classification with the purpose of managing land in “any current ecological condition, including a highly-degraded condition,”²³ so long as the reason for protection is to “maintain a natural state within which natural ecological processes and disturbance events are allowed to proceed with minimal interference.”²⁴ The definition of HSMAs should be amended (for example, as suggested in our 2024 scoping comment letter), and one or more subclassifications should be drafted or amended to accomplish, at a minimum:

- old forest recovery via passive management,
- carbon sequestration and storage,
- water quality protection, and
- flood mitigation and climate resilience.

The omission of these aforementioned HSMA purposes and functions is a fundamental oversight of the rule that arbitrarily inhibits:

- the designation of HSMAs and Ecological Reserves for the purposes established by Act 59;

²⁰ *Id.*

²¹ 10 V.S.A. § 2801(1)

²² “Conservation Categories Workgroup Report to the VCSI Science and Policy Committee.” April 3, 2024. Available for download: https://87c7e52f-960e-4157-8e23-f7c5e28989d7.usrfiles.com/ugd/87c7e5_ceb343264d82432b934b4658ab4d3b15.pdf

²³ *Id.*

²⁴ 10 V.S.A. § 2801(1)

- future state land management decisions from contributing to carbon emission reduction mandates in the Global Warming Solutions Act;
- ANR's ability to meet the pollution reduction requirements of the Lake Champlain Total Maximum Daily Load and other Clean Water Act obligations.

* * *

ANR should prepare a revised proposed rule with robust provisions for public participation and that includes a process that fully complies with the Global Warming Solutions Act and the Public Trust Doctrine. In the course of revising and before resubmitting for public comment a new proposed rule, ANR must conduct the required economic and environmental analyses, including analysis of the greenhouse gas emissions resulting from ANR's decisions under the rule,

Standing Trees recognizes the hard work and public spirit of the many ANR employees who manage and protect our public lands. Our comments are intended to improve their ability to do their jobs in a manner consistent with Vermont law and the interests of all Vermonters.

Respectfully submitted,

STANDING TREES

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