

To the Members of the House Environment and Natural Resources Committee,

I am writing in opposition to H7618, The Forestry Parity Act.

I am an organic farmer with a background in ecology and climate science communications. I have been farming in Rhode Island for over 25 years. I am also the daughter of a former legislator, so I understand how hard all of you work, and how much you care about this small state of ours.

I would like to start this letter by addressing the Legislative findings (2-27.1-2.):

(1) “that maintaining forests is vital to maintain both biodiversity, and ecosystem services, including carbon sequestration in the state.”

I like this statement in the bill. I like that it acknowledges the UN’s IPCC (Intergovernmental Panel for Climate Change) findings - that forests are important as carbon sinks. The IPCC goes further and warns that in order to avoid the most catastrophic effects of climate change, existing (mature) forests worldwide will need to be preserved.

The IPCC offers no exemption for Rhode Island.

Today, U.S. forests remove about 11% of our national carbon emissions each year. But climate scientists are saying that, with proper “management”, even more carbon dioxide could be removed from the atmosphere. Here is where we get to the sticky part. What is proper management? Is it protecting mature forests or harvesting them? Forestry specialists in climate science are telling us that it is best to let mature forests be, because existing forests are the ones sequestering the most carbon. A 2024 paper in Ecosphere (journal of The Ecological Society of America) further confirms findings that unharvested forests sequester vastly more carbon than harvested forests, those results extending 50 and 100 years down the road.

You may be hearing from others who disagree with these findings, but given the high stakes of (looming) climate catastrophe, I would think it in our best interest to err on the side of caution, and to listen to what the climate science community is telling us. We need to follow the science. I hope you are asking, where is the science that backs up contradicting claims?

So, to move onto the next two Legislative findings:

(2) “That forests are more likely to be maintained if they provide economic value”

(3) “that providing for the economic viability of the forest products industry is an interest of the state.”

I don’t challenge the validity of these two findings. But the third finding is hard to reconcile with the first finding when one considers the recommendations from climate scientists - that society has to preserve intact forests if we’re to meet our climate goals.

My final point on these two legislative findings is as follows. Would it not make more sense if the State put together a plan that quantifies its efforts to sequester forest carbon before implementing plans to grow its timber industry? Wouldn't it be better to determine which areas would best be suited for preservation before the chain saws and feller-bunchers arrive?

(4) *“That forest conservation is given the same status as farm and open space conservation under chapter 27 of title 44 (“taxation of farm, forest, and open space land”); however, elsewhere in the general laws, forestry, and the production of forest products, are not given the same benefits, including protections from taxation, and protections as agriculture; and...”*

As a farmer, this legislative finding hits me hard. That is because the Farm Forest Open Space Act was specifically enacted to *“prevent the forced conversion of farm, forest, and open space land to more intensive uses as the result of economic pressures caused by the assessment for purposes of property taxation.”* I think that the fact that this Act is being referenced as a reason to support more intensive use of forests is at odds with the Act's original intention, which had nothing to do with any other 'benefits' farmers might have.

Below, are clauses in H7618 that I oppose.

2-27.1-3. Purpose.

Regarding **Farm Forest Parity**: Farms and Forests are not the same. A farm is an economic unit created by people, whereas a forest is a complex ecological system in which trees are the predominating life-form. Reducing a forest to an economic unit takes value away from all of the other intrinsic services forests provide to society. Because of this, I do not see parity between these two industries.

2-27.1-5. Declaration of policies

Regarding **Right to Farm Act**: My understanding of **Nuisances**, within the context of the 'Right to Farm' Act was that the legislation was many years in the making and addressed specific issues that farmers were facing - stinky animals, early morning tractor usage... Transferring this Act as is towards the timber industry makes no sense. If neighbors have problems with timber harvesting, why not let people give voice to their concerns, let arbitration decide if those concerns are valid or a nuisance, and then, if necessity prevails, introduce a 'Right to Log' Act.

44-27-1. Legislative declaration.

Regarding **Happiness of the Inhabitants** *“That it is in the public interest to encourage the preservation of farm, forest, and open space land in order to maintain a readily available source of food, ~~and farm~~ and forest products close to the metropolitan areas of the state, to conserve the state's natural resources, and to provide for the welfare and **happiness of the inhabitants** of the state.”* I am pretty sure that this changes the intent of the clause. Because the primary focus of this clause seems to be preservation, it seems tunnel-visioned to add only one forest benefit (forest products) without listing other benefits such as carbon sequestration, biodiversity,

recreation, mental health benefits, summer heat reduction, clean air... What happened to the intent in the first Legislative finding?

44-18-30. Gross receipts exempt from sales and use taxes.

Regarding **(33) Forestry product operations equipment and parts**: If this bill was to pass, I hope that the definition of how many employees constitutes “small” is changed to be more in line with what constitutes a small farm. As written, this bill applies to “*businesses that employ no more than three hundred (300) employees.*” (page 18)

In conclusion, I am opposed to H7618 because it seeks to impose a forced parity between farming and forestry. These two industries and the impact they have on the land and on the planet are profound, but they are not the same. I believe that it is not safe to assume society will benefit if the policies that were designed to help farmers (mostly small family farms) are to be applied wholesale to the forestry industry.

And as a citizen concerned about our global climate, I see this bill as one that might hinder Rhode Island’s ability to meet its climate goals. I feel that this bill got far away from that first beautiful Legislative finding - (1) “*that maintaining forests is vital to maintain both biodiversity, and ecosystem services, including carbon sequestration in the state.*”

Respectfully,
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References:

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