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Holly R. Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Proposed revisions to Rule 5.100, No. 19-0855-RULE

Dear Ms. Anderson:

The Agency of Agriculture, Food and Markets (AAFM) provides the following comments on the forest conversion issues discussed at the August 24, 2021 workshop in this matter.

Where a project proposes clearing of forested primary agricultural soils as defined at 10 V.S.A. § 6001(15), AAFM generally seeks conditions to ensure that such clearing does not impair the agricultural potential of the cleared primary agricultural soils. To date, this has been accomplished by agreement. While Rule 5.100 has not been problematic for AAFM with regard to protection of forested primary agricultural soils, AAFM supports ANR's efforts to address forest conversion issues under Rule 5.100 and appreciates the Commission's attention to these issues.

Should the Commission decide to set substantive standards or best practices for forest conversion, AAFM respectfully requests that the Commission provide AAFM and others the opportunity to participate and comment.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'melanie kehne'.

Melanie Kehne
Assistant Attorney General
*Counsel for the Agency of
Agriculture, Food & Markets*