

Sustainability & Natural Resource Management Board | Working Group

December 8, 2022 4:30, Room 204 Auburn Hall

- 1. Discuss and approve SNRB Advisory Opinion (attached)
- 2. Planning for presentation at Planning Board meeting, 12-13
- 3. Discussion of public input process going forward (handout)
- 4. Public comment

To the Auburn Planning Board:

Attached is the Sustainability and Natural Resources Board (SNRB) advisory opinion and findings of fact requested in Council Resolve 06-09062022.

In submitting this opinion we ask the Planning Board to engage with the SNRB and its constituent working groups in a rigorous planning process as it considers a zoning ordinance change in the Agriculture and Resource Protection District (Article IV, Division 2). Such collaboration is envisioned in the ordinance establishing the SNRB (Article V, Division 5), specifically section 2-480 (2) "...SNRB shall maintain a working relationship with the Planning Board".

This recommendation is not a blanket rejection of any additional housing in the AGRP. Rather, the SNRB proposes a rigorous planning process that will balance the need to continue to protect the assets of the AGRP, promote economic growth of agriculture, forestry and outdoor recreation in the City, and facilitate limited development of housing in vetted locations.

The proposed text amendment (Council Order 151-11072022) as written is not in this spirit and we urge the Board to reject it.

Respectfully Members of the SNRB

Overview of Key Recommendations

- 1. Reject proposed text amendment, avoid altering the income requirement and farm accessory dwelling standard, or changing regulation of residential strips, until alternative robust AGRP protections are in place
- 2. The proposed text amendment [Resolve 09-11072022] violates many of the purposes and intentions for the Zone outlined in the Comprehensive Plan, the zoning ordinance and the Future Land Use section of the Comprehensive Plan
- 3. AGRP makes numerous economic and ecological contributions to the city of Auburn, many of which can be further promoted
- 4. Need to create maps, coordinate information, and create strict criteria and priorities for any additional building in the AGRP
- 5. Permission for new building in the AGRP should be contingent on the builder setting aside additional land (at a generous ratio of built to conserved acres) in conservation set-asides, easements or other land protection programs.
- 6. Establish best practices for community input and involvement in decision making, building consensus through transparency, inclusion of stakeholder perspectives and a fair balancing of competing goals and needs for a future Auburn.

Reject Text Amendments [Resolve 09-11072022]

The proposed text amendment would allow non-farm, single family dwellings where building is currently permitted in the AGRP zone. This would violate many of the purposes and intentions for the Zone outlined in the Comprehensive Plan, the zoning ordinance and the Future Land Use section of the Comprehensive Plan. An updated inventory of buildable lots in the zone would quickly show that such development would lead to fragmentation of lands that are now sites of prime agricultural soils, wildlife corridors and natural habitats, wetlands and areas of cultural value. In addition it would disrupt the contiguous nature of land now used for working farms and forests, recreation and sports. Further, land valuation would increase leading to rise in property tax paid by current landowners and likely contribute to speculative real estate development. Large changes in land valuation could adversely impact Auburn's municipal revenue share. Unwanted environmental impact would include increase in impermeable surfaces and run-off and potential loss of forest and cropland's mitigating effect on climate change. Finally leapfrog and sprawl development would result in the need for municipal

services -roads, police fire, school buses- away from the city core, leading to increased traffic and unnecessary municipal expense.

Detailed explanation

After careful consideration, the SNRB advises the Planning Board to reject the proposed text amendment and avoid altering the income requirement, farm accessory dwelling standards and strip zone dimensions until adequate AGRP protections are in place as described below.

Rationale, existing municipal documents

Both the Comprehensive Plan (update 2020) and Future Land Use plan state clearly the importance of restricted or no growth in the AGRP zone. The purpose of the zone is also clearly stated in the ordinance: "The purposes of this district are to allow for conservation of natural resources and open space land, and to encourage agricultural, forestry, and certain types of recreational uses. It is declared to be in the public interest that these areas should be protected and conserved because of their natural, aesthetic and scenic value, the need to retain and preserve open space lands, their economic contribution to the city, and primarily because these areas are so remote from existing centers of development that any added uncontrolled growth could result in an economic burden on the city and its inhabitants." ¹

Importance of zoning

We view zoning not as an "impediment" as stated in Council Resolve 06-0962022, but as an important roadmap for the community, establishing what kinds of development are in the public interest, and where they should be. Zoning also aims to prevent conflicting land uses (for example between industrial and residential, or agricultural and residential uses). Zoning is an exercise of a municipality's powers to protect "public health, safety and welfare."²

AGRP contributions: Economic, Ecological, Aesthetic

As noted in the ordinance, the AGRP makes economic, ecological and aesthetic contributions to the city of Auburn and the region more broadly. In addition to limiting sprawl and the wasteful use of municipal services, AGRP land contributes to the local economy through agricultural uses; timber harvesting; and low-impact recreation. All of these currently exist and can be further developed; their contributions may take place at different time scales (as is the case with forestry, when a landowner may have income from a woodlot only once in ten or more years). Since the creation of the AGRP, understanding of the value of open space, natural

¹ Auburn Maine Code of Ordinances, Sec. 60-144

² Zoning and Land Use, 5.

resources and conservation land more generally has evolved. Forested land is essential in mitigating climate change. Open space and wildlife corridors contribute to the overall health of both humans and wildlife. The AGRP holds significant value for traditional recreation (hunting, snowmobiling) and trail networks (recreational and economic potential that remains relatively untapped). The importance of agricultural land in New England is already increasing in light of extreme drought conditions in the American west, and disruptions to food supply during Covid. Such disruptions, and the reorganization of food and livestock feed supply, will only increase with climate change and other uncertainties related to environment and global politics.³ [See Appendix B for extensive documentation]

Conservation and economic growth

While conventional wisdom suggests that economic growth and conservation are at odds with each other, a 2019 study suggests otherwise: economists at Amherst College and the Harvard Forest investigated the relationship between increased conservation land (both public and private) and growth in employment, in a study of 1,500 New England towns and cities. "We found that when land conservation increased within a town or city, local employment responded positively over the next five-year period, even after controlling for other confounding factors...Stewardship of the land creates places where people want to live and they want to work. It also allows continued production of timber and non-timber forest products on many of these lands. And land protection facilitates increased tourism, increased arts, outdoor recreation."⁴

Targeted alternatives to income requirement

For nearly 60 years the current restrictions to residential development have functioned as an effective tool to ensure the objectives of the AGRP zone laid out in the ordinance and the updated Comprehensive Plan.⁵ The 2018 Crossroads report recommended eliminating these requirements ONLY after adopting a "fully analyzed, researched, and targeted alternative that will serve long-term goals and priorities for the AGRP Zone and economic sector." For these reasons we oppose eliminating the income requirement and the farm accessory dwelling standard or changing the current regulation of residential strips unless alternative robust measures are adopted that are likely to be as effective as these provisions.

³ Cardillo, Julian. "How will climate change impact New England's food security?" Brandeis Now. October 2016.

⁴ Healy, Carrie. "Communities Across New England Get Economic Boost from Protected Land" New England Public Media, March 2019.

⁵ City of Auburn, *Comprehensive Plan*, p. 104.

⁶ Ad Hoc Committee, *Transmittal Letter*.

Many if not most of these alternative measures have been proposed or discussed in previous reports and studies conducted by the Planning Board, multiple Ad Hoc Committees, outside consultants and experts. They are well summarized in the November 15, 2022 memo with accompanying material sent to the Planning Board.⁷ In addition, SNRB has reviewed primary source material (outlined in "Sources" below), consulted with members of the Planning Board, planning department staff and with SNRB constituent Working Groups with the aim of determining factors of key importance in protecting the AGRP zone should the ordinance be changed. [See Appendix D]

In the event that AGRP landowners petition to build in AGRP, new restrictions must be articulated and adhered to. The following data and considerations should be adhered to in crafting new ordinance. [See Appendix A for a simplified list]

Additional data and considerations

- 1. Create an updated inventory of buildable lots in the zone.
- 2. Create overlay maps detailing the location of the natural resources (e.g. prime soils, wetlands, slopes) and current land uses needing protections, including sites of cultural and historical value. Many of these maps already exist; *Beginning with Habitat* is a state resource that may be consulted. This array of documentation is in line with the "Open Space Index" detailed in the Conservation Working Group charge.⁸ See Appendix A for a full list of criteria and considerations.
- 3. Identify larger tracts of land in AGRP and adjacent zones that should be targeted to preserve large contiguous areas. The maps referenced in (2) should be used to establish areas where some development might be permissible, but only with conditions outlined in (4).
- 4. Require landowners petitioning to build additional structures to enroll property in state tax use programs (Tree Growth, open space, Farmland), for a minimum of 10 years.

 Many of these options are laid out in Crossroads and Ad Hoc, "Land Protection Strategies" (pp. 23 ff). Ideally, the ratio of land preserved to land built upon would be

⁸ Sustainability and Natural Resources Board Ordinance, Section 2-482: "In coordination with the City GIS staff shall keep an index of all open areas within the city, whether publicly or privately owned, including open marshlands, swamps and other wetlands, for the purpose of obtaining information relating to the proper protection, development or use of those open areas. The working group may recommend to the city council or to any Board of the city a program for the better protection, development or use of such open areas, which may include the acquisition of conservation easements."

⁷Cook, Katherine. Memo to Planning Board, November 15, 2022.

⁹ See also Maine Department of Agriculture, Conservation and Forestry, *Voluntary Municipal Farm Support Program*. https://www.maine.gov/dacf/ard/farmland_protection/voluntary_municipal_farm_support.shtml. Erica Dubois, in *The Maine Journal of Conservation and Sustainability*, explains the rationale of Current Use programs in

relatively high. For additional examples from other Maine municipalities, see Appendix C.

- 5. Conduct a cost of municipal services study for Auburn to help guide extension of municipal services. It is well documented that servicing residential development is more costly than farms and forests.¹⁰
- 6. Revisit the recommendation in the Crossroads and Ag Committee reports of 2018, in particular those related to Economic Development in the AGRP zone. ¹¹ It appears that very little has been done to incentivize agriculture, forestry and recreation, important contributors to the Auburn economy. [See Appendix B]

Whatever final recommendations are made to the Council, the SNRB encourages the Planning Board to establish best practices for community input and involvement in decision making, building consensus through transparency, inclusion of stakeholder perspectives and a fair balancing of competing goals and needs for a future Auburn.

Key Priorities

To summarize: any new building should adhere to the spirit of the AGRP ordinance, and to the following priorities:

- avoid areas of high conservation value
- avoid fragmentation
- avoid conflict between uses
- proximity to existing water and sewer
- no new impervious surfaces

Sources:

Ad Hoc Committee, "Transmittal Letter." July 16, 2018 [presenting the Final Report, listed below]

Beginning with Habitat. https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/index.html

Cardillo, Julian. "How will climate change impact New England's food security?" Brandeis Now. October 2016.

https://www.brandeis.edu/now/2016/october/donahue-food-climate-change.html [for the full study, see

Donahue, Brian, et al. A New England Food Vision: Healthy Food for All, Sustainable Farming and Fishing, Thriving

Communities. Durham, NH: Food Solutions New England, University of New Hampshire, 2014]

City of Auburn, Auburn Maine Code of Ordinances

City of Auburn, Future Land Use Plan.

City of Auburn, Comprehensive Plan, 2010 [updates 2021]

this way: "the goal of Current Use tax programs is to retain and preserve the resources sustained by natural and working lands."

¹¹ Crossroads and Ad Hoc, Section IV, pp. 20 ff.

Cook, Katherine. Memo to Planning Board, November 15, 2022.

Crossroads Resource Center and Ad Hoc Committee. *Final Report. Study to Support and Enhance Auburn's Agricultural and Resource Sector.* July 16, 2018.

Dubois, Erica. "Worth More than Market Value." *Spire: The Maine Journal of Conservation and Sustainability*. April, 2022. https://umaine.edu/spire/2022/04/22/dubois/

Forest Society of Maine, Maine Forests and Carbon. https://www.fsmaine.org/maine-forests-carbon/
Healy, Carrie. "Communities Across New England Get Economic Boost From Protected Land" New England Public Media, March 2019. [for the full paper, see Sims et al, "Assessing the local economic impacts of land protection." Conservation Biology March 26, 2019] https://conbio.onlinelibrary.wiley.com/doi/abs/10.1111/cobi.13318]

Maine Department of Agriculture, Conservation and Forestry, Voluntary Municipal Farm Support Program. https://www.maine.gov/dacf/ard/farmland_protection/voluntary_municipal_farm_support.shtml
Zoning and Land Use Regulations. State Planning Office, 2010

Appendix A.

In order to identify areas of the current AGRP zone that might be appropriate for limited development, the Planning Department should gather and analyze the following. Current restrictions should not be changed until that mapping and analysis is completed.

- wetlands
- prime agricultural soils
- slopes
- wetlands, areas impacted by shoreland zoning
- woodlots
- wildlife corridors & critical habitat [see Maine Natural Areas Program]
- blocks of undeveloped land
- existing farms
- hayfields
- recreation, current and potential [snowmobile routes, hunting areas]
- sites of cultural and historical value [previously existing villages, cemeteries]

Once the mapping outlined above is completed, specific areas for limited development should be established, bearing in mind the following priorities:

- avoid areas of high conservation value
- avoid fragmentation
- avoid conflict between uses
- proximity to existing water and sewer
- no new impervious surfaces

Appendix B

Economic Activity and Positive Impacts of Auburn's AGRP Zone Support of Maine's Climate Plan, Maine Won't Wait (4)

- 1. Maine Won't Wait Strategy D: Increase the amount of food consumed in Maine from state food producers from 10% to 20% by 2025 and 30% by 2030 through local food system development.

 (4)
- 2. Maine Won't Wait Strategy E: Climate change and development are harming Maine's natural and working lands and waters, which are key to the state achieving its carbon neutrality commitment by 2045. Increase by 2030 the total acreage of conserved land in the state to 30% through voluntary, focused purchases of land and working forest or farm conservation easements. (4)

Importance and Potential Growth of Auburn's Agricultural Economy

- 1. In 2017, the last report available, there were 496 farms in Androscoggin County, +7 from 2012. Land in farms was 55,613 acres, a 6% reduction since 2012. Average farm size was 112 acres. There were 809 total producers, 107 <35 years old and 451 35-64. 332 producers were characterized as new and beginning farmers. Androscoggin County ranked as 6th among Maine Counties with annual sales of \$40,536,000. (1)
- 2. Agriculture, commercial fishing, and forest products industries are not only important providers of food, fiber building products, ornamentals and more, but are important drivers of the northeast economy. Far from being an anachronism, these industries are modern, dynamic and vibrant contributors to the region's economy and employment and remain an important part of the landscape. Considering agriculture alone, its average annual contribution to a state's economy was estimated at \$5,958 per acre of farmland or \$1640 per resident. (3)
- 3. Droughts in the West, related to climate change, are likely to make agriculture in Maine more competitive and economically necessary. The Bureau of Reclamation has told the states in the Colorado River Basin to create an emergency plan to stop using between 2 and 4 million acre-feet of water in the next year. (18). More than 5 million acres of farmland use this water for irrigation.(19)
- 4. A variety of programs exist at the State level which can be used to invest in Auburn farms and supporting infrastructure. (22) There is an opportunity to grow the agriculture economy in Auburn with proper planning.

Importance of Woodlots and Forest Management

- 1. Woodlots harvested in Auburn averaged 428 acres per year over the period 1991-2018. (17)
- 2. 2020 values to the landowner for a tractor trailer load of forest products are as follows: biomass: \$40; softwood pulp: \$90; hardwood pulp; \$180; Firewood: \$299; Pine logs: \$1203; Oak logs: \$1703. (10), D. Griswold calculation.
- 3. Total average annual revenue generated for woodlot owners by timber harvests in Auburn over the period 2000-2020 is \$107,926 based on 2020 stumpage prices. (10) (9) D. Griswold calculation
- 4. Over the period 2000-2020, on average, each harvested acre netted the woodlot owner \$252. D. Griswold calculation

- 5. Each acre of forest near a reservoir or well filters and protects 543,000 gallons of drinking water per year, with an annual value of \$2,500, or \$60,000 present value. (7)
- 6. Even woodlots that are not actively managed remain a financial reserve for the landowner. In the event of a personal financial challenge, such as a layoff, college bills, or medical expenses, the woodlot owner can hire a forester and contract with a logger, do a responsible harvest, and generate revenue. Average forest growth rates in Maine exceed recent CD returns.
- 7. The main threat to forest productivity is conversion to non-forest. A recent study of forest loss in New England found that 'distance to developed land' was the greatest predictor of forest conversion to low density development, followed by 'distance to roads'.(7)
- 8. Forests are carbon sinks. Forest loss is a problem for the climate. A single house lot may seem like a tiny nibble into the Maine woods, but those bites add up. By current estimates, Maine loses 10,000 acres of natural and working land each year. The reaction to this challenge cannot be "no development". Such a stance would be impractical and impossible to achieve. Thoughtful development, coupled with appropriate conservation, however, should be forefront in the minds of city managers, municipal planners, and local and state officials as Maine attempts to adjust to real estate demands. The most intensive use of land occurs when every home is plotted on one to five acres. Single family homes constructed in this pattern gobble up land, strain municipal infrastructure and destroy habitat for most kinds of wildlife. A better alternative is to encourage rural "clusters "of homes while retaining large patches of conserved green and forested space. Even better is to support the revitalization of Maine downtowns. As Mainers seek to mitigate the effects of carbon pollution, we must recognize that our forests are far more valuable to our collective climate future than the price that they can fetch on the market today. (21)

Importance of Outdoor Recreation

- 1. Outdoor recreation, which depends on open lands, has economic value to the City. Value per Person per Day (2016\$) (7):
 - a. Freshwater Fishing: \$16-85
 - b. Hiking: \$91
 - c. Hunting: \$11-244
 - d. Wildlife Viewing: \$8-98
 - e. Snowmobiling: \$35
- Auburn ranks 3rd of Maine municipalities for deer harvest over the past decade. (9) Approximately 140,000 Maine hunters spend \$102 million on trip related expenses. (8) Hunters generate \$28 million in state and local taxes. (8)
- The availability of quality open space and recreation resources helps to attract businesses. (6)
 Promoting local businesses, including restaurants and farmers markets, to users of Auburn's outdoor recreation assets is an unrealized opportunity.

Impact of Development on the Cost of Community Services

Since the mid 1980's, American Farmland Trust developed Cost of Community Services (COCS) studies
to provide communities with a straight-forward and inexpensive way to measure the contribution of
agricultural lands to the local tax base. Since then COCS studies have been conducted in at least 151
communities in the United States. In every case, revenue-to-expenditures ratios are less for
"Working and Open Land" than for "Residential Including Farm Houses". The Median COCS Results

- are: Business: \$0.30; Agriculture: \$0.37; Residential: \$1.16. Note that the studies were conducted by a variety of consultants and research organizations, in as well as the American Farmland Trust. (2)
- 2. COCS studies help address three main misperceptions that are commonly made in rural or suburban communities facing growth pressures: 1. Open lands- including productive farms and forests- are an interim land use that should be developed to their "highest and best use". 2. Agricultural land gets an unfair tax break when it is assessed at its current use value for farming or ranching instead of at its potential value for residential or commercial development. 3. Residential development will lower taxes by increasing the tax base. It is up to communities to balance goals such as maintaining affordable housing, creating jobs and conserving land. With good planning, these goals can complement rather than compete with each other.(2)

Community Value of Conservation Lands

- 1. A recent study of all major towns and cities in New England found that land conservation moderately increased local employment and the labor force without reducing new housing permits. (7)
- 2. In 2022, the State of Maine provided Auburn off- set revenue of \$12578.67 for 106 parcels enrolled in land use programs (Farmland, Open Space, Tree Growth). The 2012-2022 average is \$11,160. (5)
- 3. Conserving land does not have a substantial impact on net property tax revenue over time, with any costs often offset over time by the benefits provided to residents, businesses and the municipality. Land Conservation improves the quality of life for a community's residents by enabling recreation, providing health benefits, improving air quality, moderating temperatures, and supporting environmental justice. Land conservation contributes to local economies by generating jobs, business growth, taxes and other revenue. Land conservation saves municipalities money by avoided costs of community services of new development, boosting the tax base by strengthening economic development and enhancing existing home values, protecting drinking water supplies, naturally infiltrating and managing storm water, providing flood control and prevention, and mitigating climate change. (6)

Sources

- (1) 2017 Census of Agriculture, Androscoggin County Profile, USDA
- (2) E;mail 11 8 22 Abby Farnham, Maine Farmland Trust
- (3) Cost of Community Services Studies, USDA Natural Resources Conservation Service Farmland Information Center 2016
- (4) Northeast Economic Engine, Maine Economic Impacts, Farm Credit East 2020
- (5) Maine Won't Wait, Maine Climate Council 2020
- (6) State revenues received from State for land use tax programs, City of Auburn, Jill Eastman e:mail 11 122
- (7) How Conserving Open Space Provides Economic Benefits to Massachusetts Communities Mass Land Trust Coalition 2022
- (8) Hunting Works for ME, email 11 4 22 from David Trahan, Sportsmans' Alliance of Maine (SAM)

- (9) Sun Journal 10 27 22
- (10) 2020 Stumpage Prices By Maine County/Unit, DACF Maine Forest Service
- (11) Email from Gregory Lord 11 17 22, Maine Forest Service
- (12) Rules Governing The Voluntary Municipal Farm Support Program, DACF, State of Maine
- (13) Unity Land Use Ordinance
- (14) Fairfield Land Use Ordinance
- (15) Wilton Land Use Ordinance
- (16) Final Report Study to Support and Enhance Auburn's Agricultural and Resource Sector, City of Auburn, 7 16 18
- (17) 130th Maine Legislature Second Regular Session 2022 LD 2003
- (18) Summary of Timber Harvest information for the town of: Auburn 1991-2018 E:mail from Gregory Lord, Maine Forest Service, 2020.
- (19) Colorado River states need to drastically cut down their water usage ASAP, or federal government will step in. Michael Elizabeth Sakas, 6 17 2022, CPR News
- (20) Colorado River named the most endangered in the U.S. by conservation group. Michael Elizabeth Sakas, 6 17 2022, CPR News
- (21) Erica Cassidy Dubois, Worth More Than Market Value, Spire, April 22, 2022 issue (U Maine)
- (22) City of Auburn, Agriculture Committee, Emergency Executive Order 01-0502022020 Final Report January 18, 2021

Appendix C. Examples of other Maine municipalities' Land Protection Strategies

Fairfield land Use Ordinance¹²

"The owner of a parcel actively used for agriculture or forest operations may create new lots no smaller than 40,000 square feet, provided that for each new lot created, nine (9) acres of the remaining acreage be voluntarily entered into a deed restriction or conservation easement prohibiting development for residential purposes. There is no limit to the number of lots that may be created under this provision."

Fairfield also has a category called Open Space Subdivision, and a section Dedication and Maintenance of Common Open Space of the Town of Fairfield Subdivision Ordinance.

Unity Agricultural Protection Setback

Farmland Protection Incentive Measure¹³

Where the landowner meets two conditions, the average size of new lots can be reduced to 60,000 square feet (sF). (individual lots may be made as small as 20,000 sf, as long as the average size of lots is no smaller than 60,000 sf) The first condition is that any lot created at a higher density (than one lot per 120,000 sf) cannot either locate structures or impervious surfaces on productive farmland, or otherwise diminish the land's potential for cultivation. The second condition is that for every lot created at the higher density, at least 40,000 sf of productive farmland must be preserved. This preserved land may be contained within the new lot, or within any other lot within the Town.

Open land must be preserved through deed restrictions.

¹² Town of Fairfield (Maine) land use ordinance, 1999 (last amended 2006) p. 34. https://www.maine.gov/dacf/municipalplanning/docs/Fairfield_LandUse_Ord_Feb2010.pdf

Appendix D.

Memo for the Record: SNRB process to develop its position on Council Resolves 06-09062022 and 09-11072022

Date: 12/1/22

To: Jane Costlow, SNRB Chair

From: David Griswold, SNRB Secretary

This memo serves to document the process used by the SNRB to develop its position on Council Resolves 06-09062022 and 09-11072022.

The Full SNRB met initially at its 10 13 2022 meeting and formed an ad hoc committee to develop a position. Members: Jane Costlow, Dave Griswold, Ralph Harder and Bill Sylvester.

The ad hoc committee met independently on 8 occasions, at Auburn Hall. 10-18, 10-20, 10-25, 11-1, 11-7, 11-8, 11-15, 11-22 and 12-1. The meeting on 11-7 included the City Planning Staff.

The ad hoc committee submitted two clarifying questions to the City Council which were included in the Council agenda of 11 21 22. City Manager Crowell submitted a response via email on December 1.

The ad hoc committee met with the Natural Products and Agriculture Working Group on 11-29. At that meeting, there was an extensive discussion covering the Ad hoc committee's draft position with NP&AgWG and other SNRB working group members. Following the discussion, Working Group members present unanimously endorsed the draft position [see below for working group members present]

- Community Forest: Sam Boss; Dave Griswold, Chair
- Conservation: Sam Boss, Chair; Jane Costlow; Dave Griswold
- Natural Products and Agriculture: David Bell; Chris Carson; Joe Gray; Dave Griswold; Ed Michaud; Pam Rousseau; Kathy Shaw, chair; Bill Sylvester
- Sustainability: Ralph Harder, chair; Camille Parrish

Meeting time for the ten meetings of the ad hoc committee is estimated at 15 hours. Additional time spent on research, calculations and writing is estimated to approach 40 hours.