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April 8, 2024

USDA Forest Service
99 Rangerr Road
Rochester, VT. 05767

RE: Telephone Gap Integrated Resource Project Preliminary Environmental Assessment Comments

Dear Mr. Mattrick,

On behalf of the Board of Directors for the Professional Logging Contractors of the Northeast (PLC), please accept these comments concerning the **Telephone Gap Integrated Resource Project Preliminary Environmental Assessment**.

The PLC is the voice of independent logging and associated trucking contractors throughout the Northeast. The PLC was formed in 1995 to represent independent timber harvesting and hauling businesses in a rapidly changing forest industry. The PLC started in Maine and now represents contractors that operate across the Northeast, including nearly 20 contractors that operate in Vermont, a majority of whom that have or currently work on public lands.

Federal lands in Vermont must be managed with a multiple use mandate, which encompasses a multitude of stakeholder needs, including natural communities, forest products, recreation wildlife, fisheries and even forest health. With this multiple use mandate in mind, a changing climate is swirling in the background and influencing public perception of how public lands should be managed. That being said, the scientific approach of management by the staff of USDA is more important than ever and should take precedence over what the public "thinks" should happen. We feel that the approach that USDA has taken with respect to the Telephone Gap is sound and should be moved forward with a few simple changes that we believe would only strengthen the plan in the end.

It is evident the Telephone Gap plan has been drafted to ensure a multiple use mandate, but that climate adaptation and resilience are at its core. Loggers, similar to the approach that USDA has taken on this plan, will also need to adapt to changes in how public lands should be managed, but we can't stress enough that inconsistency with government regulations and management will only add insult to injury, adding cost with increased difficulty to adapt.

While the PLC is disappointed with the small amount of timber harvesting recommended in Telephone Gap, any reductions or substantial change from the draft will not be healthy for the management unit, it will not be healthy for logging contractors that rely upon the work, and it will not be healthy for the public in the long run.

With this in mind, we would like to express support for the following concepts as they pertain to forest management, which we believe would strengthen the plan and its compliance for multiple use, multiple benefit:

1. Telephone Gap must be managed actively and not passively. Passive management would minimize the forest's ability to capture future carbon with new growth. As forests get older, they reach a point where it is beneficial to harvest the older trees leaving room for younger forest growth to regenerate in their place. The regenerative growth of the forests in Vermont will capture more carbon in the long run. Even if a mature tree is harvested, if used in the right application, the carbon is stored permanently in long lasting forest products, even after being harvested.

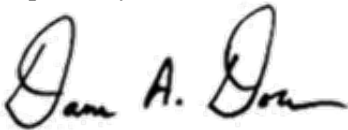
Managing the forests with a passive management plan is not the answer and we would advocate that the plan be updated to provide for timber harvesting and forest management on more total acreage.

2. The Telephone Gap plan's justification for timber harvesting is solely based upon scientific explanation and does not rely upon economic or other benefits. If the land is to be managed for multiple uses and multiple benefits, it must be managed for more than scientific benefits. If it isn't, it puts an undue reliance upon land in the state and region to provide all the forest product needs of Vermonters without the benefits. This not only puts stress on the other forests in New England and other regions, but hurts the logging contractors in Vermont that are capable of harvesting the timber locally as well as local communities that rely upon the income that logging contractors spread throughout the state.
3. Forestland makes up about 75% of Vermont (4 million acres) and it is one of the most highly forested states in the nation. It is clear, even with being highly forested, Vermont does not come close to producing the amount of wood products that are used in the state. Instead of limiting the amount of wood harvested on these lands, it would be beneficial to create a management plan to benefit the forest, the consumer and the climate.

Harvesting timber using practices that maximize carbon sequestration, provide much needed wood products to the state, promote climate and habitat benefits with healthy forests and provide economic benefits, would be a perfect compromise. The forests are a great natural resource and logging contractors are stewards of their trade that want to see the forests responsibly harvested to ensure the future of their industry. By not actively managing and harvesting on these lands, it could be detrimental to the forest by making it susceptible to fire, disease, and increased carbon emissions from decaying wood, not to mention the impacts on local economies. By managing public lands more aggressively, many of these risks can be reduced in combination with achieving climate goals, putting federal lands on par with the private forests that are already under so much pressure.

On behalf of the membership of the PLC, I applaud the staff of USDA for your hard work and dedication in the drafting of the Telephone Gap plan and request that you take our comments into consideration to strengthen the plan to ensure benefits for all under your multiple use mandate. Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink that reads "Dana A. Doran". The signature is written in a cursive, flowing style.

Dana Doran
Executive Director