

e-mail received 2/11/14

My name is Mark Doty; I am a forester and community affairs manager for Plum Creek Timber Company, a timberland owner in the Northeast Kingdom of the State of Vermont. My comments deal with S.100 An Act Relating to Forest Integrity.

It is important to thoroughly understand, address and resolve the ambiguities and questions on S.100 before there is a vote on this legislation. The likelihood of unintended consequences is large.

Even though all of Plum Creek's forestlands are covered by a working forest conservation easement and a public access easement, I am concerned that this legislation may create additional regulatory burdens and possibly restrictions on public use, through Act 250, Regional Planning, and Municipal Planning. It is entirely possible that if our forest, which is many times greater than 1,000 acres, falls under Act 250 jurisdiction, then traditional activities such as new roads, trails and additions to leased camps could require an Act 250 permit. Perhaps, even forestry itself, could be construed as being subject to Act 250, particularly if forestry creates landings and clearings, and other effects that could be construed as creating fragmentation. The proposed amendment would exempt roads used solely for forestry purposes, but many of our roads are not used solely for forestry purposes, as we welcome the recreating public for snowmobiling, cross country skiing, hiking, hunting, and many other forms of recreation, which may require an ACT 250 permit under S.100.

I am concerned with defining, and applying, through regulation, ambiguous and subjective terms in the legislation. For example, forest integrity, biological value, as well as fragmentation itself. The calculation of penalties leaves a large area of uncertainty using the term "the forestland fragmented."


All these uncertainties and ambiguities are precisely why the time should be taken, to carefully and fully explore and understand the meaning and the consequences, intended and unintended, of this legislation, before voting upon it.

Thank You,

Mark Doty

Mark Doty

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