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Appendix A

Scoping Comments Summary

Brush Hollow Salvage Project

**Marienville Ranger District
Allegheny National Forest**

**Jones and Highland Townships
Elk County, Pennsylvania**

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Appendix A - Scoping Comments Summary

INTRODUCTION

This report summarizes the public scoping process for the Brush Hollow Salvage Project environmental assessment (EA) and presents analyses based on the public comments received. The U.S. Department of Agriculture-Forest Service (USDA-FS), Allegheny National Forest (ANF), Marienville Ranger District is proposing to implement the Brush Hollow Salvage Project. The Project includes salvage harvesting dead and/or dying trees followed by reforestation treatments on 426 acres of stand replacement windthrow and salvage harvesting dead and/or dying trees on 8 acres of partially windthrown stands.

The scoping period began on May 17, 2007, when the Marienville Ranger District sent a scoping letter to 115 individuals and organizations expressing a desire to be notified about current projects, to 3 subsurface mineral owners, and to 7 adjacent landowners. The scoping package included a description of the proposed action, activities, project map, and the process for submitting comments. On May 16, 2007 a news release was sent to local newspapers and other media. Subsequently, the scoping package was edited after the initial news release and a corrected news release was sent out May 18, 2007 to incorporate these edits. The project was also included in the ANF Schedule of Proposed Actions (SOPA) beginning in the April 07 issue. Lastly, the USDA-FS posted information about this project on the ANF website on May 18, 2007.

The public scoping period for this project ended June 18, 2007. Comments were received by regular mail, electronic mail (e-mail), and telephone from the 14 respondents:

- Sonia M. Probst
- Donald Probst
- Jeremy Kleier
- Ridgway Township Board of Supervisors
- Jack Hedlund, Allegheny Forest Alliance
- Joe Rostan
- Jim Bensman, Heartwood
- Bill Belitskus, Pennsylvania Environmental Network (PEN)
- B. Sachau
- Ryan D. Little
- Jim Hovey, Mead Township Supervisor
- Ryan Talbott, Allegheny Defense Project (ADP)
- Edwin and Karen Atwood
- Timothy P. Reim

The respondents' letters are included in the project file. Comments were analyzed by coding each statement by subject, comment type, and disposition. Comments from the Allegheny Forest Alliance, Ridgway Township Board of Supervisors, Sonia and Donald Probst, Jim Hovey, and Joe Rostan were supportive of the proposed action.

The sections below summarize the content analysis of the public scoping comments for the Brush Hollow Salvage Project and include the following:

I. Issues

- A. Preliminary issues raised by the public
- B. Significant and non-significant issues
- C. Non-issue comments, questions, and requests
- D. Indicator Measures

I. Issues

A. Preliminary Issues Raised by the Public

An issue is defined as “a point of disagreement, debate, or dispute with the proposed action based on some anticipated effect.”

1. Logging promotes compacted soil and increased erosion, which do a great deal of damage to the forest and ultimately remove resources vital to the long term health of the forest.
2. The Forest Service should not add to impacts this area is already experiencing from oil and gas drilling by proposing to log another 434 acres.
3. Logging increases the risk of a forest fire by leaving small twigs, branches and other pieces of “uneconomical debris” where they fall.
4. Industrial logging is the worst possible management practice for forests already severely impacted by air pollution and depletes the remaining buffering agents in the already acidified soil.
5. Logging is an inappropriate use of public forests and is contrary to public interest.
6.
 - a. Salvaging down and dying trees would remove one of the most important components of a late structural forest and would remove nutrients vital to forest health.
 - b. Removing dead and fallen trees removes critical habitat for a diverse set of animals, plants, and fungi.
7. It is important to point out again that early successional habitat is to be provided in MA 2.2 only if it is “consistent with historic disturbance regimes” according to the Forest Plan. Historically, this down and standing dead material would be left on site to enrich the soil. Thus, the salvage activities proposed in MA 2.2 are not consistent with the Forest Plan.
8. The Salmon Creek and Sackett areas, both within the project area, have been identified by the Forest Service as “most threatened landscapes” due to historic OGM activity and development. “The Forest Service cannot keep proposing projects that occur in these same areas that will have further impacts on scenic quality and integrity and ignore the reality of the situation on the ground.”

B. Significant and Non-significant Issues

Significant Issues

Significant issues are used to formulate alternatives, prescribe mitigation measures, or analyze environmental effects. Issues are “significant” because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflict.

The interdisciplinary team identified no issues characterized as significant for the purposes of this analysis.

Non-significant Issues

An issue is non-significant if it:

- Is outside the scope of the proposed action.
- Has already been decided by law, regulation, or decision at a higher level such as the ANF Land and Resource Management Plan (ANF-LRMP).
- Is not specific to the decision to be made.
- Is conjectural and not supported by factual information or scientific evidence.

1. Logging promotes compacted soil and increased erosion, which do a great deal of damage to the forest and ultimately remove resources vital to the long term health of the forest (Kleier).

Response: *Although this comment does provide a dispute with the proposed action, the commenter does not provide substantiated reasons for why soil impacts or erosion are a significant concern specific to this project. Soil disturbance (compaction, displacement, puddling/rutting, burning, erosion, and mass movement) would be limited to 15 percent of the activity area by ANF-LRMP standards and guidelines. Rutting is limited to 5 percent of the activity area, included in the 15 percent disturbance. Any disturbance above the 15 percent threshold would be addressed with corrective actions by the ANF.*

2. The Forest Service should not add to impacts this area is already experiencing from oil and gas drilling by proposing to log another 434 acres. (ADP, Belistkus)

Response: *This comment is conjectural and is not supported by factual information. There has been no oil and gas drilling in the Brush Hollow Salvage project area in the past 10 years and the Forest Service has only recently received a proposal for three new wells off of Forest Roads 185 and 239. National Fuel Gas maintains a number of wells and pipelines within the project area. Oil and gas impacts will be considered in the environmental analysis.*

3. Logging increases the risk of a forest fire by leaving small twigs, branches and other pieces of “uneconomical debris” where they fall. (Kleier)

Response: *This statement is conjectural and is not supported by factual information. Salvaging down trees in the Brush Hollow Salvage project area would reduce the risk of a large wildfire by removing the larger fuel types, by removing pockets of dense fuels, and by restoring shade after reforestation. In the event that a wildfire does occur after the salvage harvest, it would be less intense and would be less likely to have a negative affect on the project area.*

4. Industrial logging is the worst possible management practice for forests already severely impacted by air pollution and depletes the remaining buffering agents in the already acidified soil. (Belistkus)

Response: *This issue is not supported by scientific evidence. Studies on the reduction of base cation in soil conclude that the reduction is attributed to acid rain deposition and there was little change due to historical disturbance from harvesting (Bailey et. al. 2005).*

5. Logging is an inappropriate use of public forests and is contrary to public interest. (Heartwood)

Response: *This statement is a non- significant issue because whether or not to log on National Forests is beyond the scope of this analysis. This topic is more appropriately addressed at the national level. The ANF-LRMP permits timber harvesting as a tool to achieve a number of resource objectives. The opinion polls that were cited were national in scale, several years old, and contained no information specific to this proposal. They are beyond the scope of this analysis and drawing any inference would require speculation.*

6. a. Salvaging down and dying trees would remove one of the most important components of a late structural forest and would remove nutrients vital to forest health. (Belistkus, ADP, Heartwood, Sachua, Vaughan, Little, Reim)
b. Removing dead and fallen trees removes critical habitat for a diverse set of animals, plants, and fungi. (Kleier)

Response: *The Forest Service agrees that down and dying trees are an important component of late structural forests, important wildlife habitat, and are vital to forest health. ANF-LRMP standards, guidelines, and mitigations measures for snag density (standing dead trees), coarse woody debris, and cavity habitat would be met when the salvage activities take*

place. In MA 2.2, other than hazard trees, no standing green trees will be cut and material, including whole trees and tree tops, would be left on site. The no action alternative would consider the effects of no salvage harvests.

7. It is important to point out again that early successional habitat is to be provided in MA 2.2 only if it is “consistent with historic disturbance regimes” according to the Forest Plan. Historically, this down and standing dead material would be left on site to enrich the soil. Thus, the salvage activities proposed in MA 2.2 are not consistent with the Forest Plan. (ADP)

Response: *This comment is a non-significant issue because it is conjectural and is not supported by factual information. The proposed action does not plan to create early successional habitat in MA 2.2, it was created by a severe windstorm, which is consistent with historic disturbance. Salvage and sanitation harvests in MA 2.2 are considered suitable in the ANF-LRMP (LRMP p. 110). See response to non-significant issue number 6 regarding down and standing dead material.*

8. The Forest Service identified the Brush Hollow area as a “potentially threatened landscape” in its scenic integrity evaluation during Forest Plan Revision due to oil and gas drilling. Instead of proposing salvage logging operations in this area, further impacting an already impacted landscape, the Forest Service should be doing everything it can to address the oil and gas impacts that have already occurred and others that may occur. (ADP, Atwood)

Response: *This is a non-significant issue because it is conjectural and not supported by factual evidence. The environmental analysis will consider the impacts to scenic quality and integrity. ANF LRMP standards and guidelines would be followed to ensure that proposed activities would meet or exceed the standards and guidelines for scenery.*

C. Non-Issues, Comments, Questions, and Information Requests

Various public comments presented statements of opinion that did not present a clear dispute with the proposed action, and therefore were deemed non-issues.

1. The Forest Service knows there is no threat from fire in the Allegheny National Forest, thus no need to reduce hazardous fuels. (ADP, Belistkus)

Response: *This comment is conjectural and does not present a clear dispute with the proposed action. The severe blowdown in the Brush Hollow Salvage project area does create the threat of a large wildfire. Taken into account the drought patterns that have affected the ANF in the past 15 years and the mix of 1hr, 10hr, 100hr, and 1000hr fuels that have been allowed to dry without the shade of an overstory in the Brush Hollow Salvage project area, the conditions do exist for a large wildfire. The largest fire on the ANF in recent history occurred in 1990 in the Jamison Run area. It burned approximately 600 acres of 5 year old blowdown that was the result of a tornado. A fire of this magnitude in the Brush Hollow area could have far reaching results, such as, killing the remaining overstory trees, permanently altering soils, consuming seeds and seedbeds, and altering aquatic habitat if riparian zones are significantly affected by the fire.*

2. Now that the Forest Service acknowledges that the deer herd is at levels it wants and the forest is beginning to recover, there is no need for reforestation activities that reduce the impact of deer browsing. (ADP, Belistkus)

Response: *Even though deer browsing has decreased on the ANF in recent years due to new management practices by the Pennsylvania Game Commission, understory vegetation is slow to recover (LRMP p. A-2). Even with lower overall deer numbers on the ANF, deer levels and impacts within a specific area of forest can vary and have a significant influence on regeneration. With lower deer numbers reforestation will be further enhanced. The Forest*

Service proposes reforestation treatments only where necessary in the project area to ensure the establishment and growth of desired species.

3. The need for providing “a diversity of vegetation patterns” and a “range of forest age classes and vegetation stages” in MA 2.2 appear to be satisfied by just allowing natural succession to take its course. This is particularly true given recent info on deer populations. (ADP)

Response: *This comment does not present a clear dispute with the proposed action. MA 2.2 has objectives for mid to late structural as well as early structural vegetation (LRMP p. 109). These objectives can be met either through natural disturbance or silviculturally. Salvage harvests are considered suitable in MA 2.2 (LRMP p. 110). Salvaging down material would allow for reforestation treatments, which would restore diverse seedlings to areas that have been blown down. See response to non issue number 2 regarding the recent information on deer populations.*

4. National Fuel Gas has a lot of pipelines, etc. in the area that will need to be avoided. (Rostan)

Response: *National Fuel Gas as well as any additional entities that have pipelines or other facilities in the project area will be contacted prior to the implementation of the Brush Hollow Salvage Project. OGM wells and pipelines will be avoided.*

5. Consider planting chestnut as chestnut was and is present in the Brush Hollow area. (Rostan)

Response: *Chestnut tree planting was considered during the planning of this project, but the Forest Service does not have access to a sufficient amount of blight resistant stock at this time.*

6. The no-action alternative does not adequately respond to the wishes of the majority of Americans who do not want their natural heritage converted to stumpland. The no-action alternative has almost no chance of being selected due to all the time and money invested in developing the project. (Heartwood)

Response: *This comment is a non-issue because the no-action alternative is required by regulation for the purpose of comparing environmental impacts of the proposal to baseline information. The no action alternative, in this case, provides that baseline. Other alternatives are developed in response to significant issues and must meet the purpose and need for the action.*

Since the comment is primarily a suggested format for the analysis and describes no environmental effects or causes of, as a result of the proposed action, it is considered a non-issue.

7. The analysis needs to consider a number of topics. Examples of these are as follows: biodiversity, fragmentation, predation impact of logging, songbird and/or neotropical migratory bird declines, late successional and mature forest habitat, cow bird parasitism, carbon sequestration, the Indiana bat, and increases in the deer herd. (Heartwood)

Response: *Many of these topics will be considered during the development of the project and some will be accounted for in this analysis. None, however, describe any potential or probable environmental effects that may occur specific to the proposed action. None of these comments raised issues considered significant for the purposes of this analysis.*

8. The Forest Service’s attempts to frame the salvage and reforestation activities as being used to promote late structural forests and early structural forests is simply a continuation of a management policy centered on promoting valuable black cherry and other so-called “Allegheny hardwoods” that distort science to justify management decisions. (Belitskus)

Response: *This statement is a non-issue because it is a statement of opinion and is not supported by any factual information. The majority of the Brush Hollow project area is classified as Allegheny hardwoods forest type. Black cherry and red maple usually dominate*

these stands on the ANF (LRMP p. A-8). Allegheny hardwood species tend to be shade intolerant and need ample sunlight to regenerate. Much of the overstory shade in the Brush Hollow Salvage proposed treatment areas has already been removed by a severe windstorm. Salvaging down trees would allow for reforestation treatments, which would remove interfering vegetation and promote the regeneration of Allegheny hardwood species that were present prior to the windstorm.

9. All old-growth forest ecosystems are important mechanisms to address climate change and must be protected. When such forests are cut, roads are bulldozed and the trees' roots decay or are bulldozed out and soil is disrupted, carbon dioxide is released. It would take centuries for created early structural forest to build up such an underground carbon reservoir. (Belistkus)

Response: *This is a non-issue because no activities are planned in old-growth forests and there is no road construction or reconstruction proposed. Recent work done on seven experimental forests from Maine to Wisconsin and West Virginia, including the Kane Experimental Forest, examined differences in soil carbon content and concentration across a range of management activities including thinnings and clearcuts. In this work, conducted on second growth forests, the data shows no considerable effects attributable to management treatments; control plots (that is, second growth forests that had not been treated since their origin) did not differ in soil or forest floor carbon from treated plots (Hoover, 2007 unpublished).*

10. MA 3.0 has vastly different priorities than MA 2.2, but the Forest Service proposes virtually the same activities in these two different MA's and splits hairs to justify them in each. The Forest Service must prepare an EIS documenting how salvaging and reforestation activities promote both late-successional and early-successional forests in MA's 2.2 and 3.0 respectively. (ADP)

Response: *This comment does not present a clear cause and effect outcome of the proposed action and is considered a non-issue. The ANF-LRMP states that salvage harvests followed by reforestation treatments are considered suitable in both MA 2.2 and 3.0 (LRMP-pp. 110, 114). MA 2.2 is managed as an uneven-aged late structural forest, while MA 3.0 is managed largely as an even-aged forest. Salvaging wind thrown trees followed by reforestation treatments will have different outcomes in each MA. Returning vertical structure of desired species in MA 2.2 would allow for uneven-aged management and will move the area to its desired condition. Except for hazard trees, no standing live trees would be harvested in MA 2.2 with this proposal. Salvage and reforestation activities in MA 3.0 would result in new cohort of trees that will be managed using even-aged techniques throughout their rotation. Some standing live trees may be cut with stands that suffered stand replacement damage to ensure that adequate sunlight reaches the forest floor for the development of seedlings. More coarse woody debris would be left in MA 2.2 than in MA 3.0.*

The purpose of the environmental assessment is to consider and disclose environmental impacts that will help the responsible official to determine whether to prepare an EIS or to issue a finding of no significant impact. Use of an EA does not preclude the later development of an EIS. An EIS is triggered when scoping or the subsequent analysis indicates the proposed action may have a significant effect on the human environment.

11. The Forest Service allows OGM companies to construct roads without performing proper NEPA, and then uses these roads for its management activities. This makes it much easier for the Forest Service then to propose salvage sales such as Brush Hollow and be able to claim that "no new road construction or reconstruction is needed as existing roads can be utilized to access the dead/or dying timber." (ADP)

Response: *This statement is a non-issue because it does not present a clear dispute with the proposed action. Only existing Forest Service roads will be used to haul timber.*

12. The Forest Service must analyze the impacts of using OGM roads in its timber sales. (ADP)

Response: *This statement is a non-issue because it does not present a clear dispute with the proposed action. The Forest Service does not plan to use any OGM roads in this project to haul timber.*

13. How is the Forest Service going to access bh005, bh009, bh012, bh007, bh014, and bh011? Are OGM roads going to be used to access these or any other units? (ADP)

Response: *The Forest Service plans to use only existing Forest Service roads to access all units in the project area. Brush Hollow unit 005 will be skidded to a landing at the end of FR 497, bh009 will be skidded along the Tennessee Gas Pipeline to a landing near the FR 302 stone pit, bh012 and bh007 will be skidded to landings on FR 302, bh014 will be skidded to a landing on FR 497, and bh011 will be skidded to landings along FR 302A.*

14. The Forest Service should file objections to any new wells proposed in the Brush Hollow Salvage project area. (ADP)

Response: *This comment is a non-issue because it does not present a clear dispute with the proposed action. The Forest Service recently received a proposal to develop three wells off Forest Roads 185 and 239 within the project area. This proposal is currently being reviewed by the Forest Service.*