



United States  
Department of  
Agriculture

Forest  
Service

Eastern  
Region

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# **Appendix D**

## **Forest Service Response to 30-Day Public Comments**

### **Mead's Mill Project**

**Bradford Ranger District, Allegheny National Forest  
McKean County, Pennsylvania**

# **Mead's Mill Project**

## **Appendix D**

### **Response to Public Comments to the Environmental Assessment**

## **Appendix – D**

### **Mead’s Mill Project**

### **Forest Service Response to 30-Day Public Comments**

Federal agencies with jurisdiction by law or expertise and the public were invited to comment on the Mead’s Mill Environmental Assessment (EA). Comments on an EA or on a proposed action shall be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both (40 CFR 1503.3(a)).

This appendix displays the public and governmental agency comments received during the Mead’s Mill EA 30-day comment period. Each letter type is divided into individual comments followed by the Forest Service response. Seventy-one letters (including e-mails) were received from individuals, organizations, or governmental agencies. No new information was received that either brought forward new issues or would cause a change in the analysis for the Mead’s Mill Project EA.

Possible responses to comments are to (40 CFR 1503.4(a)):

- 1) Modify alternatives including the proposed action.
- 2) Develop and evaluate alternatives not previously given serious consideration by the agency.
- 3) Supplement, improve, or modify its analyses.
- 4) Make factual corrections.
- 5) Explain why the comments do not warrant further agency response, citing sources, authorities, or reasons which support the agency’s position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

Comments were analyzed for site specificity to the Mead’s Mill project. Some comments were judged to be “beyond the scope of the project”, because they addressed broader issues than the implementation of activities proposed in the Mead’s Mill documents. For example, ‘I don’t like logging on the National Forests (a national-level issue)’ or ‘I don’t want logging on the Allegheny National Forest (a national/Forest-level issue)’. A comment such as “I don’t think you should cut unit \_\_\_ because there is critical habitat there” would be an example of a comment site-specific to the Mead’s Mill project. Some comments were opinions and not specific to the proposed activities or the adequacy of the document, ‘I do (don’t) support road building.’ Some “comments” were not comments at all, but simply quotations. The response to these types of comments will be “comment noted.” As noted in the comment responses, most responses point to where the comment was addressed in the DEIS, some required a correction to the document (and were so noted), and some were beyond the scope of the project.

There were 75 comment letters received during and after the 30-day comment period. Individual comments are identified by the number of the letter and the corresponding comment number within that letter. For example the third comment derived from the eighth letter would be labeled “Comment 8-3.”

The Forest Service response follows each comment and is in italic type. For example:

#### **Letter 3**

##### **Comment 3-1**

We shouldn’t be logging on National Forest land.

*USDA-FS Response: This is a national issue and beyond the scope of the site-specific Mead’s Mill project.*

## Letter 5

### Comment 5-7

You need to provide an alternative that returns the project area to pre-clearcut conditions.

*USDA-FS Response: See Chapter 2 – Alternatives, Alternatives Considered But Eliminated From Detailed Study.*

The Mead's Mill Project EA was published on 3/26/2008. The following letters were received during the thirty day comment period:

#	Name	Date received	Type
1	Jon Bogle	April 22, 2008	E-mail
2	Vaughan Boleky	April 22, 2008	E-mail
3	Martha Burton	April 22, 2008	E-mail
4	Mark Burwinkel	April 22, 2008	E-mail
5	Diane Clark	April 22, 2008	E-mail
6	Douglas Cornett	April 22, 2008	E-mail
7	Mike Craig, Wildwood Ranch	April 22, 2008	E-mail
8	Mark Donham, Director - Heartwood Program	April 22, 2008	E-mail
9	John Doyal	April 22, 2008	E-mail
10	Michael Englert	April 22, 2008	E-mail
11	Finn	April 22, 2008	Letter
12	Mark M Giese	April 22, 2008	E-mail
13	Laura Graves	April 22, 2008	E-mail
14	Stephen Grimes	April 22, 2008	E-mail
15	Chad Halsey	April 22, 2008	E-mail
16	Helen Harrell	April 22, 2008	E-mail
17	Leigh Haynie	April 22, 2008	E-mail
18	William Homestead	April 22, 2008	E-mail
19	Andrea Krochalis, MA	April 22, 2008	E-mail
20	Grey Larsen	April 22, 2008	E-mail
21	Ryan Little	April 22, 2008	E-mail
22	Willard Mittelman	April 22, 2008	E-mail
23	David Nickell	April 22, 2008	E-mail
24	Stephen W. Patterson	April 22, 2008	E-mail
25	Charles Phillips	April 22, 2008	E-mail
26	John Pickard	April 22, 2008	E-mail
27	Shawn Porter	April 22, 2008	E-mail
28	Jim Scheff	April 22, 2008	E-mail
29	Rich & Marsha Scherubel	April 22, 2008	E-mail
30	Paul Schneller	April 22, 2008	E-mail
31	Billy Stern	April 22, 2008	E-mail
32	Dr. Mary Lyn Stoll	April 22, 2008	E-mail
33	Martha Strother	April 22, 2008	E-mail
34	Sarah Taylor	April 22, 2008	E-mail
35	Sandra Tokarski	April 22, 2008	E-mail
36	Jeffery Watt	April 22, 2008	E-mail
37	John and Betty Weber	April 22, 2008	E-mail
38	Paula Worley	April 22, 2008	E-mail
39	Terri Zeman	April 22, 2008	E-mail
40	Garrett Adams	April 23, 2008	E-mail

#	Name	Date received	Type
41	Rhonda Baird	April 23, 2008	E-mail
42	Noel Bednaz	April 23, 2008	E-mail
43	Bob Brister	April 23, 2008	E-mail
44	Dinda Evans	April 23, 2008	E-mail
45	Freya Fuhrman	April 23, 2008	E-mail
46	Terri Greene	April 23, 2008	E-mail
47	Randall Haile	April 23, 2008	E-mail
48	Lisa Hulett	April 23, 2008	E-mail
49	Carey Lea	April 23, 2008	E-mail
50	Jeanne Leimkuhler	April 23, 2008	E-mail
51	Eileen McManus	April 23, 2008	E-mail
52	Eric Morris	April 23, 2008	E-mail
53	Jeffrey Powell	April 23, 2008	E-mail
54	Mary Eileen Rice	April 23, 2008	E-mail
55	Steven Chase Spurgeon	April 23, 2008	E-mail
56	David Lip	April 24, 2008	E-mail
57	Mary Lou McFarland	April 24, 2008	E-mail
58	Joseph McGibbon	April 24, 2008	E-mail
59	Reef, Meghan	April 24, 2008	E-mail
60	Craig Rhodes	April 24, 2008	E-mail
61	Michael Hicks	April 24, 2008	E-mail
62	Robert Fener	April 25, 2008	E-mail
63	Brendan P. McMahon	April 25, 2008	E-mail
64	Julia Schad	April 24, 2008	E-mail
65	B. Sachau	April 22, 2008	E-mail
66	Greg Moore	April 24, 2008	E-mail
67	Ruth Stambaugh	April 24, 2008	E-mail
68	Virginia Cotts	April 23, 2008	E-mail
69	John A. Keslick, Jr. - Consulting Forester & Tree	April 26, 2008	E-mail
70	Chris Gooch	April 22, 2008	Letter
<b>Comments received after 30 day comment deadline - April 26, 2008</b>			
71	Lydia Garvey	April 27, 2008	E-mail
72	Ryan Talbott - Forest Watch Coordinator - Allegheny Defense Project	April 28, 2008	E-mail
73	Kevin J. Fie (name not legible and envelop missing)	Not dated	Letter
74	Chris Klarer	May 3, 2008	E-mail
75	Timothy Reim	May 6, 2008	Letter

Comments 1 through 67 are substantially the same in that they submitted an identical e-mail in mass. Comments 64 through 67 have individualized lead paragraphs followed by the above mentioned identical e-mail. Comments 68, 69, and 70 were individualized letters or e-mails differentiated from all the rest of the letters. Comments 71 - 75 came in after the 30 day comment period was over - April 26, 2008.

## Comments and Responses to the Mead's Mill Project EA

### **Letter 1 (includes letters 2 - 67, 74 & 75)**

#### **Comment 1-1**

The Forest Service must reconsider the purpose and need for this proposal.

*USDA-FS Response: The Purpose and Need is consistent with the ANF LRMP direction - See EA, Section 1.4 - pages 6 & 7 and Section 1.5 - Need - pages 7-9.*

#### **Comment 1-2**

There is certainly no purpose and need to add to the impacts that already exist in this area from rampant oil and gas drilling, logging, and ATV trails.

*USDA-FS Response: Opinion - Comment noted.*

#### **Comment 1-3**

The only thing the Forest Service should be concerned with is restoring this area of the Allegheny to protect its surface resources, improve water quality and protect habitat for the federally endangered northern riffleshell and clubshell mussels.

*USDA-FS Response: Opinion - Comment noted.*

#### **Comment 1-4**

In 2001, the Pennsylvania DEP designated Morrison Run and portions of the Dutchman Run basin, both of which are within the project area, as Exceptional Value streams.

*USDA-FS Response: This is an accurate statement - See EA, Section 3.1.1, page 21 for more information.*

#### **Comment 1-5**

The Forest Service and DEP have completely failed to protect the surface and water resources in this area of the Allegheny National Forest .

*USDA-FS Response: Opinion - Comment noted. This is not supported by any information.*

#### **Comment 1-6**

According to the EA, several areas "are now crisscrossed with numerous poorly designed and poorly maintained non-system roads...which are hydrologically connected to streams at numerous locations [and] are contributing large volumes of sediment to the streams."

*USDA-FS Response: Quotation - Comment noted. See the summary of PADEP survey results on Browns Run that did not show impairment from road related runoff, pages 21 and 22.*

#### **Comment 1-7**

This raises serious concern regarding the federally endangered northern riffleshell and clubshell mussels which live downstream of these drainages in the Allegheny River.

*USDA-FS Response: Page 18 of the January 31, 2007, USFWS concurrence letter states; ' The Forest Service has determined that implementation of Forest Plan Alternative Cm is not likely to adversely affect the clubshell or northern riffleshell. The Forest Service has committed to implement numerous conservation measures to ensure that adverse effects*

*will be avoided. We concur with the Forest Service's effects determination. Our concurrence is based on the following 1) clubshell and northern riffleshell populations appear to be fairly healthy and are reproducing in the Allegheny River; 2) sediment accumulations in mussel habitat have not been noted, indicating that previous Forest Plan standards and guidelines have been fairly effective in reducing sediment inputs; 3) the proposed conservation measures under Alternatives B-D are more stringent than those implemented under the former Forest Plan, so sediment and contaminant inputs to the Allegheny River are not expected to increase, and may decrease; 4) timber harvesting will occur in less than one percent of the area that drains directly into the Allegheny River, and within this area, no harvesting will occur within riparian corridors; 5) ongoing remediation of erosion and sedimentation problems associated with existing roads and trails will continue, reducing sediment inputs; 6) due to the restrictions on herbicide use within the 13 percent area, and the stream buffers associated with herbicide application, herbicide will not be transported to the Allegheny River; and 7) construction of buildings, roads, motorized trails, landings, and oil and gas developments will be avoided in riparian corridors, particularly within the area that drains directly into the Allegheny River.'*

**Comment 1-8**

With the high levels of oil and gas development within the project area, the Forest Service has no business proposing over 1,000 acres of logging that will undoubtedly increase erosion and sedimentation of streams that feed into the Allegheny River where the northern riffleshell and clubshell mussel is located.

*USDA-FS Response: See Response to Comment 1-7, above. Benefits of this project were not used to offset adverse impacts, and adverse impacts of this project are not significant even when separated from benefits (EA, Chapter 4). However, the benefits of road maintenance and limestone surfacing will offset present and projected adverse effects of private OGM hauling on Forest Service system roads (Mead's Mill RAP, pp. 60 - 64).*

**Comment 1-9**

The Forest Service should withdraw this proposal and instead focus on fulfilling its mandatory "responsibility to ensure surface resources are protected." The Forest Service cannot waste its time planning unnecessary timber sales when oil and gas drilling continues to impact the Allegheny at record levels. The only thing the Forest Service should be concerned with in this area is developing a comprehensive watershed restoration plan in order to protect and restore water quality and habitat for the northern riffleshell and clubshell mussels.

*USDA-FS Response: See Response to Comments 1-1 and 1-7 above.*

**Letter 64**

**Comment 64-1**

Forests that are ruined by cutting and drilling can never be replaced. Please save every acre for a time when we can be smarter and more environmentally safe in their use. Let our children and grandchildren make decisions about their use - don't hurry their conversion to present use.

*USDA-FS Response: Opinion - Comment noted.*

## **Letter 65**

### **Comment 65-1**

i agree with the comments as to preserving this forest from the venal, ugly greedy developers who will wrest it forever from our children's use and protection.

*USDA-FS Response: Opinion - Comment noted.*

## **Letter 66**

### **Comment 66-1**

Please think/reflect what the LONG TERM RAMIFICATIONS of YOUR DEEDS WILL BE. IS it in the "Best Interests" of our Children/Grandchildren?? What about the IMPACT on WildLife and the quality of water in the streams/creeks/ponds/wells/and ULTIMATELY the ENTIRE OHIO RIVER BASIN. "LOOK BOTH WAYS BEFORE YOU CROSS THE STREET!". Everyone's Mother would INSTRUCT US. Now MOTHER NATURE is WARNING US "NOT TO MESS WITH HER ENTIRE BALANCE OF HER INCREDIBLY SENSITIVE ECOSYSTEM!" STOP! CEASE! DESIST BEFORE YOU REALLY SCREW UP! It will take us 10-25,000yrs to clean up and restore our WATER and FORESTS IF WE STOP ALL HARMFUL PRACTICES TODAY! For these and many other reasons, I FULLY ENDORSE THE FOLLOWING LETTER/PETITION:

*USDA-FS Response: Opinion - Comment noted. See Chapter 4 of the EA for analysis of effects.*

## **Letter 67**

### **Comment 67-1**

We as humans need to find better, more sustainable ways of supplying ourselves with things like wood, oil, etc. We must not sacrifice areas that are important for either wildlife or for humans just for the sake of producing more commodities.

*USDA-FS Response: Opinion - Comment noted. There are a variety of Purpose and Needs met by this project. See Response to Comment 1-1 above.*

## **Letter 68**

### **Comment 68-1**

The Forest Service must reconsider the purpose and need for the Mead's Mill project as opposed to the need for restoration projects in the Allegheny National Forest. We should all be focused on the problems that have finally become better understood as threats to our land, air and water, as well as ecosystems and the life that inhabits them.

*USDA-FS Response: Opinion - Comment noted. See Response to Comment 1-1 above.*

### **Comment 68-2**

Promoting more oil and gas drilling over restoration of erosion, deforestation and silt deposition in waterways, simply adds to all of the problems instead of solving any.

*USDA-FS Response: Opinion - Comment noted. The subsurface rights in the project area are privately owned. Therefore, the Forest Service has not proposed any oil and gas development for this project (see Section 1.3 of the EA (page 4)).*

**Comment 68-3**

By the time these wells are functional, the country should be much farther into alternative energy sources and conservation. Having spent 14 years in Alaska, I have not seen that the economic results these projects produce offset the value of what they destroy.

*USDA-FS Response: Opinion - Comment noted.*

**Comment 68-4**

As a taxpayer who would have been fine with enough tax increases to adequately fund good forest management, I oppose wasting the funds we do have on bad forest management.

*USDA-FS Response: Opinion - Comment noted.*

**Comment 68-5**

The point is to PRESERVE our National Forests, not sell parts off to the highest bidders.

*USDA-FS Response: Opinion - Comment noted. The Forest Plan is a programmatic document that implements the Forest and Rangeland Renewable Resources Planning Act of 1974 (RPA), as amended by the National Forest Management Act of 1976 (NFMA). The Forest Plan implements NFMA by providing “for diversity of plant and animal communities based on the suitability and capability of the (ANF) in order to meet overall multiple-use objectives and within the multiple-use objectives of a land management plan” (16 USC 1604(g)(3)(B)).*

**Comment 68-6**

A comprehensive watershed restoration plan, please.

*USDA-FS Response: Opinion - Comment noted. Although a watershed restoration plan has not been completed, road related watershed recommendations have been made (See the RAP, pages 22 - 29 and recommendations on pages 62-64) and Appendix D. The Brad WINs project was developed to implement improvements based upon the aforementioned recommendations (Decision Memo signed 1/18/2007). See a description of recent projects already completed or underway in the last paragraph of Section 1.3 in the EA (page 5).*

**Letter 69****Comment 69-1**

Logging is the problem with plans to log. Please take the time to understand what logging is.

<http://www.treedictionary.com/DICT2003/SOUND/whatitis/index.html> I am sure you could add to the list of what logging is. If you have any thing good to say about logging please provide data to back it up and I will add it to the [www.treedictionary.com](http://www.treedictionary.com). If not, do not log this area.

*USDA-FS Response: See the ANF FEIS, Chapter 3, Section 3.3 (pages 3-77 - 3-178).*

**Comment 69-2**

I am apposed to logging on the ANF due to the result of such actions based on tree biology.

*USDA-FS Response: Opinion - Comment noted. Please see Response to 1-7 and 68-6 above.*

### **Comment 69-3**

The Mississippi Valley Laboratory in St. Louis was established in 1899. Dr. Herman von Schrenk was the director. Studies on wood decay and discoloration were done mostly. In time, the studies drifted toward wood products. In 1907 the lab was discontinued and the Forest Products Laboratory at Madison, Wisconsin took over. The major focus of the lab was on wood products decay. Tree biology never had a chance. Now you claim logging will result in results that do not happen. Please provide data on benefits of logging this area.

*USDA-FS Response: The ANF LRMP explains the "Rational for Choice of Vegetation Practices" (See Appendix A of the LRMP, pages A1 - A45) and Chapter 7(Reference List) of the ANF FEIS.*

### **Letter 70**

#### **Comment 70-1**

The description and discussion of the red pine stand is found on pages 106-107 of the EA. While "Options" are listed, there is no discussion of effects. On page 221, a sentence reads, "The effects analysis in the vegetation management section will determine whether or not the stand activities will be dropped or carried forward." I am unable to find any analysis of the effects in this document, yet in Table C-2, both alternatives list the stand as having a commercial thin. How was this decision made, if there is no analysis of the effects?

*USDA-FS Response: The above reference on page 221 has been changed by errata. The line officer was informed through the EA that the stand could be treated either commercially or non-commercially (pages 105-108).*

*The pages listed in the EA vegetation section describing the "Options" included a discussion of effects (activity and related pros and cons) for the decision maker to use when deciding on no-treatment, treatment, or how it will be treated. Based on the silvicultural input and input from other resources (hydrology and soils) the decision maker made an informed decision regarding the selected treatment of this stand.*

*Analysis of effects from the Forest Hydrologist and Forest Soil Scientist are filed in the project file. Here is a summary of the effects of this treatment:*

*There is no expected impact to the water source due to the BMPs and mitigations applied in this stand from commercial or non-commercial treatments. A BMP that will be used in either treatment type is buffering the water source a distance of 300 feet. This exceeds the state BMP for protecting municipal watersheds. In addition, the stand edge closest to the residences will be lined with a silt fence (as shown in the logging plan) where there is potential for runoff to flow towards the water source. This will provide evidence of erosion leaving the site. Logging equipment would enter the stand on an existing old low-standard logging road. There may be minor changes made to this road, but natural drainage patterns would not be altered and flow will not be concentrated. Within the stand, equipment would travel cross-country and skid trails would not be bladed into the soils, so overland flow would only be altered where soils are compacted. Using low pressure tires would help minimize compaction. In addition, the placement of slash on the skid trails will also minimize erosion and compaction, and slow water movement. The burning of slash piles would only create minor localized effects as water and ash movement would only be effected at the pile and immediately adjacent to the pile.*

#### **Comment 70-2**

A logging plan was supplied to me upon request. It shows the access to the stand as coming from the east, with a skid route of 0.6 miles. During the analysis process, it was suggested that a right-of-way across the private land to the southwest of the stand should be pursued. This skid route would be much shorter with

possibly less impact to the soil and water (our spring) resources. Was this option explored; if not, why? There is no discussion of this in the document. Is this still **an** option?

*USDA-FS Response: When existing access across National Forest System land is available and there are no anticipated adverse effects based upon design criteria and mitigations there is no need to pursue access across private land.*

### **Comment 70-3**

Both treatment options on pages 106 and 107 discuss burning. How will the stand be accessed for this burning, as there is only a narrow trail leading into the stand? What equipment will be used? The logging plan shows this trail as a "skidforward route" - is this accessible by a fire engine? Again, the access to the stand from the private land to the southwest is a short, accessible, though somewhat steep, drive.

*USDA-FS Response: From a silvicultural stand point we will be burning piles of slash during the winter or early spring. They will be piled in the openings created by the thinning. It can even be completed when there is snow on the ground if the piles are covered in advance. There is no intention of completing an area burn because it would not meet treatment objectives. Access to the stand for a fire engine may not be necessary. All equipment could be brought in by hand. Many times an ATV or Kubota is available to help. We would not be burning more piles than could be managed by the available resources.*

### **Comment 70-4**

One of the mitigation measures listed on pages 229-230 reads, "In the case of severe rutting or degradation to the springs water quality operations will cease.. .a monitoring plan will be put in place." If the quality of our water source is degraded, if only temporarily, monitoring will not supply us with drinking water. How will the Forest Service address this issue? What provisions will be made if our drinking water is affected temporarily? Permanently? There is no discussion of this in the document.

*USDA-FS Response: The BMPs and mitigations applied to this stand are expected to protect this water source. While BMPs are effective, they cannot totally prevent erosion or runoff that may occur from extreme rain events. Considering you have documented problems with this spring before the Forest Service will not assume liability to correct problems. You have the option to file a tort claim.*

### **Comment 70-5**

I suggest a mitigation measure that our water will be tested before and after all management practices.

*USDA-FS Response: You are welcome to test your water prior to project implementation ;however, we will not make it a mitigation. We believe the design criteria and mitigations on pages 229 and 230 in Appendix B are sufficient to protect water quality. In addition, the silt fence installed along this stand will be inspected for correct installation and collection of material.*

### **Comment 70-6**

While I realize the concern over the health of the red pine stand, I **am** also concerned with the impacts to our drinking water. I hope we can resolve this in a way that treats the bark beetle problem, but still protects our water source.

*USDA-FS Response: See response 70-5.*

**The following comments are from letters received after the 30 day comment period deadline. Comments were reviewed for new information. The line officer directed team members to respond to the comments not duplicated under timely comments.**

**Comment 72-1**

We request that the Forest Service reconsider the purpose and need for the proposal. At the very least, an Environmental Impact Statement (EIS) must be prepared given the scale and intensity of this project within the “13 percent area” of the Allegheny National Forest. Additionally, the Forest Service must revisit the Biological Assessment and Biological Evaluation as will be discussed in greater detail below.

*USDA-FS Response: One reason for doing an EA is to determine if an EIS is necessary. The Responsible Official (Bradford District Ranger Anthony Scardina) for the Mead’s Mill EA determines if an EIS is needed or if a FONSI is sufficient for the project (See the EA, Section 1.7 on page 10). FSH 1909.15 Chapter 20, Section 20.1 and 20.2, (pages 2 - 4) gives direction on when to prepare an EIS. Please refer to the Decision Notice and Finding of No Significant Impact for an explanation of the decision and why an EIS is not needed for this project. The BA and BE for this project is consistent with the January 2007 Biological Evaluation ANF Forest Plan Revision.*

**Comment 72-2**

The Mead’s Mill Project EA is not in accordance with the Forest Service Chief’s forest plan appeal decision due to its failure to consider the cumulative effects of OGM development on air quality.

*USDA-FS Response: New information (Review of information - OGM Development. And Air Quality, Allegheny National Forest) has been analyzed and is contained in the Errata and replaces the cumulative effects analysis of air quality discussed on pages 205 and 206 of the EA. Based upon this new information, information presented in the ANF LRMP, ANF LRMP FEIS, ANF LRMP Record of Decision, and ANF LRMP planning record, Forest Supervisor Leanne Marten, found that a correction, supplement, or revision to the environmental documentation for the ANF LRMP or an amendment of the ANF LRMP is not necessary at this time concerning OGM development on the ANF and its potential impacts to regional air quality (Information Review dated July 31, 2008).*

**Comment 72-3**

The Mead’s Mill project area contains special and unique watersheds. It contains two Exceptional Value basins, contains occupied habitat for the endangered northern riffleshell mussel, contains suitable habitat for the endangered clubshell mussel – yet, the Forest Service is embarked on a path to implement a project that will exacerbate the impacts that have already been felt in these watersheds – whether it is from previous logging, oil and gas development, or residential impacts – just so it can cut more trees. If the Forest Service cannot be trusted to use its discretion to protect an area such as this, where will it use its discretion to protect the Allegheny National Forest?

*USDA-FS Response: Opinion - comment noted. This issue is already decided by law, regulation, Forest Plan, or higher level decision. The Forest Service will implement Forest Plan Standards and Guidelines that either meet or exceed state BMPs for logging activities. The USFWS concurred with the USDA-FS 2007 ANF BE and as a result did not issue a jeopardy opinion on either of the two federally endangered mussels in the Allegheny River. Other aquatic species with a lower status would be protected as well with this type of concurrence from the USFWS for the endangered mussels.*

**Comment 72-4**

The Forest Service did not consider a broad range of alternatives.

*USDA-FS Response: Refer to Purpose and Need and Issues in Chapter 1 and Alternatives in Chapter 2. The original proposed action was changed after field reviews, the RAP, and public scoping. In addition, two other alternatives were considered but later dropped based on ground truthing (See the EA, pages 18 & 19). Alternatives were derived by issues identified during the 30 day comment period. Alternative 3 specifically addresses concerns for water quality by dropping new road construction while maintaining road-decommission goals. The line officer made the following statement in the FONSI (page 5) “I believe a range of reasonable alternatives was analyzed given the number of significant issues identified. This complies with Forest Service National Environmental Policy Act regulations under 36 CFR 220.7b (2).”*

**Comment 72-5**

The Forest Service is proposing the very activities that threaten heritage resources in an area that has the highest density of such resources in the Allegheny.

*USDA-FS Response: The Seneca Nation of Indians Tribal Historic Preservation Office has determined the Mead’s Mill project activities will have “no effect” on cultural resources. ANF specialists concluded a controlled burn and herbiciding existing open areas was an acceptable solution to prevent further invasion by deeper rooted, woody vegetation. THPO concurred with this treatment regime for managing the heritage resources. Heritage staff members will be included in designing the burn plan and the plan will be reviewed and approved by SHPO prior to implementation.*