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Forest Service

Allegheny
National Forest

March 2007



Allegheny National Forest

Final Environmental Impact Statement

Appendix A – Public Involvement and Response to Comments

To Accompany the
Land and Resource Management Plan



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Land and Resource Management Plan

Allegheny National Forest

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1.0 Introduction

This Appendix includes a summary of public involvement activities (section 2.0), a description of how the analysis of public comments was conducted (section 3.0) and the response to comments submitted on the Proposed Land and Resource Management Plan (PLRMP) and Draft Environmental Impact Statement (DEIS) (sections 3.1-3.17).

Comments received on the PLRMP and DEIS are viewed as critical in shaping a responsible Land and Resource Management Plan (LRMP) and Final Environmental Impact Statement (FEIS) that supports the Forest Service's mission and legal mandates, the goals of both the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA) and the interests of the public as a whole.

As mandated by law, the Allegheny National Forest (ANF) established and maintained correspondence with government agencies throughout the revision process. Copies of comment letters received from these entities are included in section 4.0 of this Appendix.

Documents discussed in this Appendix are listed in the official project record for Forest Plan Revision.

2.0 Public Involvement

The Forest Service is emphasizing collaboration and partnerships with federal, state and local government, non-governmental organizations and the public in order to help accomplish its mission. Towards this end, the ANF has provided several opportunities for public and other agency involvement in the revision process from initial outreach efforts in September 1997 through the signing of the Record of Decision (ROD) in February 2007. These opportunities have taken the form of comment periods, public meetings, consultation with organizations and media releases.

2.1 Comment Periods

The ANF has solicited input from the public, employees, tribal governments and other government agencies during three comment periods held during the Forest Plan Revision process. Comments were received in several forms, including mail, e-mail, fax, telephone conversations, office visits, meetings and workshops. In addition to these three comment periods, comments were also accepted on a rolling basis via written letter, email, fax, phone calls and in-person discussions.

2.1.1 1997 Need for Change Comment Period

In 1997, the first effort at Forest Plan Revision began and the Need for Change (NFC) was produced and released to the public. A public listening session in September of 1997 and three public workshops held in October 1997 followed the release of the NFC document. Over 600 comments were received in the form of letters, phone calls, meetings with the public and meetings with employees. The process was temporarily suspended due to reallocation of funding. The information from these comments was reviewed and considered when the next Forest Plan Revision process began in 2003.

2.1.2 2003 Notice of Intent Comment Period

The Notice of Intent (NOI) public comment period was from September 25, 2003 to November 10, 2003. The NOI time period was advertised in local newspapers and other media (see Section 2.4). The 192 comments received during this comment period were all considered during the development of the PLRMP and DEIS.

Summary of Comments Received During the NOI Comment Period

This brief summary of public comments for the NOI comment period includes the collaborative learning workshops and written comments stemming from them, the compilation of comment on the Forest Plan Revision Notice of Intent completed by the Content Analysis Team (CAT), written comments received and non-formal sources of comment, such as letters to the editors of regional and local newspapers. Eight broad topic areas are covered: vegetation management (timber); wilderness and special areas; recreation; water quality, soils, and air quality; oil and gas management; roads and access concerns; habitat diversity and wildlife; and the Forest Plan Revision process. The order of the topics relates roughly to the level of contentiousness and the volume of comments received.

Vegetation Management (Timber)

Public comment was unanimous that having a healthy forest is the highest priority for management of the ANF. The problem, of course, is in the details of what this means and how it is attained.

To a significant group of timber industry and local and regional community leaders who have been consistent, active, outspoken participants, a healthy forest yields timber harvest and regenerates species for future saw timber. This healthy forest will sustain the regional economy, create employment opportunities for people, and sustain rural, natural resource-based socio-cultural patterns.

Critics of the current plan, some of whom were active litigants against the ANF, were consistent, energetic, vociferous participants and submitted detailed, lengthy comments. Areas of greatest divergence between them and some of the community leaders included: volume of timber harvest, ranging from none to the 1986 Plan ASQ; location of suitable timber land, ranging from none on the ANF to rolling back designated wilderness; species composition, ranging from restoration of the pre-Columbian forest to maintenance of current patterns; harvest and regeneration methods, ranging from horse logging and no herbicides to more expansive cuts; greater “flexibility” regarding threatened and endangered species limitations; and the overall intensity of management.

The most noteworthy element of contention, as noted in the CAT analysis of NOI comments, was polarization over black cherry and its abundance now and in the future forest.

There were participants whose comments lay between the extremes, who tended to be drowned out by the polarized groups. For example, there is a regional industry group which held its own forum on vegetation management on the ANF and submitted a concise, detailed brief with very specific comments and recommendations.

Wilderness and Special Areas

In many ways, the pattern of comments here reflected the pattern in vegetation management (timber), with one significant exception. There is a very effective, well-organized group, which mobilized over 5,600 public comments from individuals and groups in support of its position for recommendation for designation of 8 new wilderness areas comprising about 10 % of the ANF, without opposition to logging in other areas. The two main groups supporting wilderness and one loose coalition in opposition to greater wilderness have been consistent, vigorous proponents of their positions at meetings, in formal comments, and in the local print media.

Public comments at the start of Forest Plan Revision were often off target relative to special areas and wilderness. Staff spent a great deal of time working with the public to understand the nuances of the analyses required and the distinctions among wilderness, national scenic areas, recreation areas, research natural areas, and wild and scenic rivers. It appears that this education process was successful and had a modulating effect on public comment except at the extremes. The disagreement now focuses on compromises of how much and where.

Recreation

In general, public comment here was in agreement on a desire for greater diversity of recreational opportunities, for better management of recreation on the ANF and for better access to those opportunities. We received comments on a wide range of concerns, which became more focused as the process evolved.

One way to view comments relates to the primacy of one type of opportunity over another, the ultimate mix of recreation offered and how these elements play out in space on the ANF. An initial split of comments appeared to be between motorized and non-motorized recreation. This became more clearly differentiated into wheeled motorized and snowmobiles as distinct comment makers, equestrian groups as a third set, and a fourth set, “other” non-motorized, which includes hikers, mountain bikers, cross-country skiers, and back country campers, among others.

Wheeled motorized advocates, mostly All-Terrain Vehicle folks, wanted to “complete the system” to 350 miles, as envisioned in the 1986 Plan, plus better parking, camping and other support of these trails, including connectors to communities. The most salient concern for the snowmobile groups was termed either a safety or a quality issue, i.e. having trails solely dedicated to snowmobile use, with connectors to local communities and amenities. Both these motorized recreation groups were consistent participants at workshops and in written comments.

The same was true for the equestrian groups. Better facilities for parking, camping, and equestrian support were sought. There was a concern regarding designated trails and restriction of cross-country riding. Most wanted unrestricted cross-country riding to continue.

The “other” non-motorized advocates were not unified or organized and were less vigorous in providing comments for more trails, better-maintained and better-marked trails, and some minimal facilities outside wilderness areas.

The “rustic lodge” or motel/restaurant at Kinzua Beach was noteworthy more for the relative absence of formal comments than anything else. While this continues to be a significant topic among elected officials and the business community in Warren County, most of the comments were in the local print media. This highlights the two philosophies of including tourism as a component of regional economic development: develop recreation facilities on the ANF using public funds and private funds for tourism versus preserve/restore the ANF as an outdoor recreation site, with developed services provided by private entrepreneurs on private land.

Interestingly, there was little comment in recreation on water-related activities, fees for services, fishing, or hunting, which is commented on in the habitat diversity section of this summary of NOI comments.

Water quality, soils and air quality

Water quality was frequently mentioned at workshops and in written comments as a key element of the original rationale for establishment of the ANF, and there was some frustration with the planning effort “relegating this to a non-issue,” as one critic said at a workshop. Like the notion of a “healthy forest,” abundant, clean water for urban use, recreation, and environmental integrity was something all parties can agree on. This was approached from many perspectives, especially the concept of “riparian corridors.”

Soils were similarly commented on as fundamental to forest health, ecosystem integrity, and forest productivity. Soils are connected with air quality in this region through acid rain and acid deposition. Most comments advocated more attention through monitoring and treatment prescriptions, including liming and leaving more woody debris.

Oil and Gas Management

There was some frustration among the public that oil and gas management on the ANF is not a major issue in Forest Plan Revision. Concerns centered around actual ecological damage from spills and by-product dumping, road impacts on the ecosystem and water quality in particular, noise interfering with recreation and affecting wildlife, and the general visual quality, which is compromised by the industry's access to their mineral rights. This was an area where there generally have not been two sides, as the industry was not a participant to any extent in public workshops or comments. Industry critics and those wanting more government control over oil and gas development and extraction by the ANF were consistent participants.

Roads

Several sets of comments related to roads, and while they were a common topic with two sides on every element, they did not form a hot button concern. Some wanted more roads, mostly for recreation access, and others wanted fewer roads, including decommissioning. Road (gate) management was an additional access concern, with the percentages cited in the 1986 Plan as the basis for some comments. Comments on the impact of roads on the ecosystem, particularly on stream quality, were often voiced. Timber industry, recreation groups, hunting groups and preservation groups all articulated concerns regarding roads, but with very different perspectives on them.

Habitat diversity and wildlife

This broad topic area is obviously linked with many of the others above, e.g. vegetation management, water quality and riparian corridors and recreation. The topics mentioned above under these areas will not be repeated here. There were several significant concerns that were voiced by the public: old growth and early successional habitat; native species and non-native species; game species management; and corridors or connectivity of habitat, including old growth. These were often closely related in pairs.

There was a good deal of comment about and support for more old growth habitat on the ANF. How old growth is defined, i.e. the 1986 Forest Plan definition versus virgin forest, formed the basis of much discussion and comment. Often old growth habitat was linked with landscape connectivity for species present on the ANF. Old growth stands were often linked with wilderness and special areas designation proposals in public comments as well, and were commented on consistently.

Early successional habitat was principally a concern of game species advocate groups, who were well represented, consistent and articulate in their comments. We have many longstanding agreements with some of these groups and they are well versed in the process of comment making for projects and planning.

Native and non-native species concerns took a number of forms, some of which are better placed under vegetative management, e.g. restoration of the forest to its pre-Columbian forest type of Hemlock-White Pine-Beech-Sugar Maple. Associated with this position was the re-introduction of predator species. Comments on non-native species, in addition to the vegetation management concern of Red Pine, tended to focus either on desirable non-native (especially fauna) or invasive non-native species (especially aquatic flora and fauna). These comments generally came from organizations rather than individuals and were in written comments.

Deer herd management is a very contentious and high profile concern in Pennsylvania and the "big woods" area of the northern tier of the Commonwealth. While this is played out very publicly, the public's attention has been

focused on the Pennsylvania Game Commission (PGC), the Kinzua Quality Deer Cooperative (KQDC), of which the ANF is a very active member, and the Deer Management Assistance Program of the PGC, which is a very valuable tool for the ANF. This was not a significant source of comments for the NOI comment period.

Plan Revision Process

The ANF used a collaborative learning approach throughout Forest Plan Revision. The process itself was a topic of comments from the public. Most comments were very positive, particularly regarding the use of outside facilitators and the collaborative learning approach. In general, the public supports transparency and openness in the process of Forest Plan Revision, although some felt that the plan revision team did not live up to this standard on occasion.

There were criticisms within comments on the revision process. Some participants resented “being forced to work with obstructionists” during workshops. A couple of very vociferous, consistent participants, from both extremes of the vegetation management and wilderness issues, saw the collaborative learning process as manipulative and “forcing consensus.” Perhaps the most common comment by participants was that the scope of the process was unnecessarily narrow, constrained to a few issues and channeled to predetermined alternatives. Finally, some commented that there was too little involvement of state and local organizations and governments in the process, and that planning was taking place in isolation from them.

2.1.3 2006 PLRMP and DEIS Comment Period

See Section 3.0 of this Appendix.

2.2 Public Meetings

Public meetings were conducted in order to facilitate public involvement in the Forest Plan Revision. The location and time of public meetings was advertised in newspapers and other media (see section 2.4). Public meetings were conducted in three formats: collaborative learning workshops, open houses and hearings. Collaborative learning workshops were designed to bring multiple stakeholders with different values and opinions to the same table to improve their understanding of different values and opinions, and to explore areas of collaboration during their participation in the Forest Plan Revision process. To facilitate the discussion and provide insight on the collaborative learning process, the ANF hired Dr. Susan Senecah, Dr. Gregg Walker, and Dr. Steve Daniels. Open houses consisted of ANF staff presenting information to the public in the classroom or on field trips and then receiving feedback and comments. Hearings were meetings in which ANF staff presented information on Forest Plan Revision and the public had the opportunity to comment while a stenographer recorded the proceedings.

Public meetings are listed in chronological order in sections 2.2.1-2.2.3.

2.2.1 Public Meetings Prior to Publication of the Notice of Intent

April 30, 2003 (Sheffield)—Collaborative Learning: Community Conversation

A meeting and training session was held with the public to discuss the collaborative learning process and the rules of civil engagement for the Forest Plan Revision process.

May 2, 2003 (DuBois) and May 3, 2003 (Bradford)—Collaborative Learning: Concern and Interest Meetings

Public meetings were held regarding the “Need for Change” in the 1986 Forest Plan. The three facilitators from the collaborative learning meetings were present to conduct the workshops. One portion of the meetings detailed the Forest Plan Revision timeline and process, everything that would occur and needed to occur to develop the new plan, and an overview of each major component: biodiversity, recreation, species viability, timber, minerals, wilderness, economic values, ecological values, and social values, and how they need to work together to create a plan that managers can utilize when moving the ANF towards its desired future condition.

August 14, 2003 (Erie), August 16, 2003 (Warren) and August 18, 2003 (State College)—Open House: Forest Plan Revision process and Public Involvement Meetings

The interdisciplinary team met with the public to discuss comments received thus far in the Forest Plan Revision process, and how formal comments would be tracked and processed during Forest Plan Revision. Members of the public had the opportunity to address other concerns regarding issues on the ANF. Overwhelming support was given for the use of the collaborative learning facilitators at these meetings from the public.

2.2.2 Public Meetings Following Publication of the Notice of Intent

October 27, 2003 (Warren) and October 28, 2003 (Erie)—Collaborative Learning: Notice of Intent Discussion

The public was provided an opportunity to speak with resource specialists regarding the NFC and NOI prior to the November hearing. This hour long meeting was followed by a collaborative learning work session leading towards the first steps of the Analysis of Management Situation.

November 5, 2003 (State College)—Hearing: Notice of Intent Hearing and Content Analysis Team: Public Comment Analysis

A formal public hearing regarding the NOI and NFC was held. A stenographer recorded a large number and wide variety of comments from the public regarding the NOI.

June 3 and 5, 2004 (Allegheny National Forest, various locations)—Open House: Draft Analysis of the Management Situation Field Tour and comment

Two public tours were held regarding work on the Analysis of the Management Situation (AMS). The tours were structured around the three major issues identified for Forest Plan Revision: Recreation, Vegetation Management, and Habitat Diversity. The mornings of both days consisted of presentations to the public discussing what was found during the analysis portion of writing the AMS in regards to the three major issues. The afternoons of both days had short tours, consisting of two to three stops where the public was presented with additional information about the AMS pertaining to issues as they related to the Management Area or activities that occurred at that particular area. There were many comments received during the meetings.

September 10, 2004 (DuBois) and September 11, 2004 (Warren)—Collaborative Learning: Alternative Development Workshops

During the workshops, members of the public and ANF employees broke into groups and worked on developing alternatives. The groups developed their alternatives by first reviewing the Draft Summary of the Analysis of Management Situation, and then summarizing a section for other members of the group. This exercise led into a discussion of what each person wanted for the ANF and what principles they valued most for the ANF. After making a list of principles, each group developed a method for deciding which principles would be used to define the group’s desired forest conditions. Groups then developed their principles into desired Forest conditions. Using

wall charts to keep track of thoughts and ideas, groups began to develop their own alternatives based on their principles and desired forest conditions. As with the public tours, there was much comment made during the meetings. However, in this instance there was much comment given afterwards regarding the Draft Summary of the Analysis of the Management Situation, and the information contained therein.

June 2, 2005 (Warren) and June 4, 2005 (Brookville)—Collaborative Learning: Presentation of Preliminary Designs for the Draft Alternatives

The ANF planning staff reviewed the six key decisions to be made in FPR, the major elements driving the design of the draft Alternatives and summarized how the public's input was incorporated into Alternative design. Other FPR elements being considered, but which were unlikely to vary by Alternative, were also discussed. Participants were asked to submit their questions for a period of question and answer. Answers to all questions were posted to the ANF website. The participants then broke into diverse groups to work collaboratively to provide the planning team with focused feedback on the design of the draft Alternatives.

2.2.3 Public Meetings Following Publication of the PLRMP and DEIS

Open House: Presentation on the PLRMP and DEIS

Eight meetings were held in which ANF staff presented information on the PLRMP, the Alternatives A thru D and the DEIS. The public had an opportunity to submit formal comments. The meetings were held at the following dates and locations:

- May 22, 2006 (Bradford)
- May 23, 2006 (Warren)
- May 24, 2006 (Marienville)
- May 25, 2006 (Ridgway)
- May 31, 2006 (State College)
- June 1, 2006 (Harrisburg)
- June 5, 2006 (Mars, north of Pittsburgh)
- June 6, 2006 (Erie)

August 21, 2006 (Slippery Rock University) and August 22, 2006 (Kane)—Hearing

Formal hearings on the PLRMP, Alternatives A thru D and the DEIS were held. A stenographer recorded a large number and wide variety of comments from the public.

2.3 Consultation with Organizations

Besides comment periods and public meetings, ANF employees have been available to consult with organizations via meetings, phone calls and written correspondence by mail, email and fax. This section contains a diverse portion of the consultation that ANF employees have engaged in with federal, tribal, state and local government

as well as non-governmental organizations and legislative contacts. The purpose of the consultation was to answer questions, discuss concerns over draft documents, discuss timelines, and receive input on issues related to FPR. The record of consultation with organizations as well as individual members of the public is documented in the project record for FPR.

Consultation with organizations is listed in chronological order by organization type in sections 2.3.1-2.3.5.

2.3.1 Consultation with Federal Government

July 19, 2002–Letter from the USDI Bureau of Land Management to USDA Forest Service Eastern Region

February 7, 2005–Meeting with the USDA Forest Service Northern Research Station at Warren, PA

June 2, 2006–Meeting with U.S. Environmental Protection Agency (USEPA) at Philadelphia, PA

June 27, 2006–Meeting with USDI Fish and Wildlife Service (USFWS) at State College, PA

2.3.2 Consultation with Tribal Government

January 8, 2004–Meeting with Seneca Nation of Indians at Salamanca, NY

June 16, 2005–Meeting with Seneca Nation of Indians at Salamanca, NY

September 27, 2005–Meeting with Seneca Nation of Indians at Salamanca, NY

March 14, 2006–Meeting with Seneca Nation of Indians at Salamanca, NY

June 13, 2006–Meeting with Seneca Nation of Indians at Salamanca, NY

June 27, 2006–Meeting with Seneca Nation of Indians at Salamanca, NY

August 25, 2006–Meeting with Seneca Nation of Indians at Salamanca, NY

2.3.3 Consultation with State Government

November 25, 2002–Meeting with the Pennsylvania Fish and Boat Commission (PFBC) and Western Pennsylvania Conservancy (WPC)

July 28, 2005–Meeting with the Pennsylvania Department of Conservation and Natural Resources (PA DCNR) at Harrisburg, PA

March 17, 2006–Meeting with the PA DCNR

April 11, 2006–Meeting with PA DCNR, PFBC and Pennsylvania Department of Environment Protection (PA DEP)

May 31, 2006–Meeting with PA DCNR and PA-DEP at Harrisburg, PA

2.3.4 Consultation with Local Government

April 22, 2005—Meeting with Warren County Commissioners at Warren, PA

May 13, 2005—Meeting with Elk, Forest, McKean and Warren Counties and Warren Townships at Bradford Ranger District

July 11, 2005—Meeting with Warren, McKean and Forest Counties and Mead Township at Marienville Ranger District

July 28, 2005—Meeting with Elk County Commissioners at Marienville Ranger District

August 22, 2005—Meeting with Elk, Forest, McKean and Warren Counties and Mead Township at Bradford Ranger District

August 23, 2005—Meeting with Forest Area School District

August 29, 2005—Meeting with the Elk County Townships at Ridgway, PA

August 31, 2005—Meeting with the Kane Area School Board

September 6, 2005—Meeting with the Ridgway Area School Board at Ridgway, PA

September 19, 2005—Meeting with Elk, Forest, McKean and Warren Counties at Marienville Ranger District

September 27, 2005—Meeting with Forest County at the Marienville Ranger District

October 17, 2005—Meeting with Elk, Forest, McKean and Warren Counties at Bradford Ranger District

November 14, 2005—Meeting with Elk, Forest, McKean and Warren Counties at Marienville Ranger District

January 23, 2006—Meeting with Elk, Forest, McKean and Warren Counties at Bradford Ranger District

February 27, 2006—Meeting with Elk, Forest, McKean and Warren Counties at Marienville Ranger District

May 18, 2006—Meeting with Elk, Forest, McKean and Warren Counties

June 27, 2006—Meeting with Elk County and Townships at Ridgway, PA

July 11, 2006—Meeting with Forest County Townships at Marienville, PA

July 13, 2006—Meeting with Warren County and Townships at Brokenstraw Township

July 17, 2006—Meeting with McKean County and Townships at Bradford, PA

July 31, 2006—Meeting with Elk, Forest, McKean and Warren Counties at Warren, PA

Local Township Resolutions

Between September 2005 and March 2006, resolutions were received from the following local townships, boroughs, and cities:

- Brokenstraw Township Supervisors (Resolution # 92605)
- Cherry Grove Township Supervisors (No Resolution #, dated 12/12/2005)
- City of Warren (Resolution # 2697)
- Clarendon Borough Council (Resolution # 010206)
- Conewango Township Supervisors (Resolution # 2005-15)
- Conewango Township Supervisors (Resolution # 2005-8)
- Deerfield Township Supervisors (Resolution # 2006-3)
- Eldred Township Supervisors (Resolution # 1 of 2006)
- Elk Township Supervisors (Resolution # 05-2005)
- Farmington Township Supervisors (Resolution # 122005-1)
- Freehold Township Supervisors (Resolution # 2006-01-17)
- Glade Township Supervisors (Resolution # 436)
- Johnsonburg Area School District (January 4, 2006)
- Johnsonburg Area School District Board of Education
- Jones Township Supervisors (Resolution # 05-05)
- Limestone Township Supervisors (Resolution # 2005-2)
- Limestone Township Supervisors (Resolution # 2006-1)
- Mead Township Supervisors (Resolution # R 12-12-05)
- North Central Pennsylvania Regional Planning and Development Commission (Resolution # 05-11-672)
- Pine Grove Township Supervisors (Resolution # 11-05)
- Pittsfield Township Supervisors (Resolution # 1-1-06)
- Pleasant Township Supervisors (Resolution # 05-11)
- Pleasant Township Supervisors (Resolution # 05-7)
- Ridgway Area School District (Requisite Planning Components)
- Ridgway Township Supervisors (Resolution # 4-2005 and 2-2003)
- Sheffield Township Supervisors (Resolution # 347)
- Southern Tier West – Regional Planning & Development Board (January 9, 2006)
- Spring Creek Township Supervisors (Resolution # 1306)
- Sugar Grove Borough Officials (Resolution # 01-03-06)
- Sugar Grove Township Supervisors (Resolution # 06-01-03)

All included some or all of the following points:

1. The ANF is encouraged to enter into an MOU with Warren County.
2. 435,000 acres should be maintained in the manageable land base for timber management.
3. 80 mmbf per annum is the desired minimum level of timber harvest.
4. Early successional habitat (0-20 years) must encompass no less than 100,000 acres (20%) across the forest landscape at any one time.
5. Oak areas must remain open to various forms of forest management to ensure continued viability.
6. 120,000 acres should be dedicated for intensive recreation use.
7. Adding additional Wilderness is not readily supported nor is the establishment of “de facto” wilderness through the process of administration consideration.
8. Landscape corridors need not be part of any proposed use of the ANF.
9. The equine user should be accommodated in any trail strategy.

10. No fewer than 1,000 jobs should be directly linked to ANF activities with an annual value of employment reaching in excess of \$50M.
11. The planning and site selection for the inclusion of modern lodging facilities and the complimentary amenities which would support it is critical toward the feasibility of placing such a complex on or adjacent to the ANF.
12. A Shoreline Management Strategy (SMS) regarding the optimum utilization of the Kinzua Reservoir and all contiguous areas should be considered as a compliment to the forest plan

2.3.5 Consultation with Non-Governmental Organizations

February 11, 2004—Meeting with the Ecosystem Management Advisory Committee (EMAC) at State College, PA

February 16, 2005—Meeting with the Pennsylvania Soil Resource Conservation and Development Council at Warren, PA

April 11, 2005, July 20, 2005 and October 11, 2005—Meeting with Friends of Allegheny Wilderness (FAW) at Warren, PA

May 12, 2005—Meeting with FAW and Allegheny Defense Project (ADP) at Warren, PA

June 25, 2005— Meeting with the Allegheny Federation of Snowmobile Clubs (AFSC) at the Marienville Ranger District

July 25, 2005 and September 23, 2005—Meeting with the Western Pennsylvania Conservancy in Warren, PA

August 3, 2005—Meeting with the Allegheny Equine Advisory Group (AEAG) at Meadville, PA

August 11, 2005—Meeting with AEAG at Warren, PA

September 24, 2005—Meeting with FAW at Ridgway, PA

October 7, 2005—Meeting with TNC at Warren, PA

May 20, 2006—Meeting with the Sierra Club at State College, PA

June 14, 2006—Meeting with Allegheny Hardwood Utilization Group (AHUG) at Ludlow, PA

July 19, 2006—Meeting with the Ecosystem Management Advisory Committee at Boalsburg, PA

July 21, 2006—Meeting with the Pennsylvania Oil and Gas Association at Warren, PA

August 10, 2006—Meeting with the Pennsylvania Hardwood Development Council at State College, PA

Note: see FEIS Appendix E, pp. E-14 and E-15, for a list of consultation between ANF employees and experts on plant and animal species.

2.3.6 Consultation with Legislative Contacts

May 9, 2006—Meeting with Representative from Senator Arlen Specter’s Office at Washington, DC

May 10, 2006—Meeting with Representative from Senator Rick Santorum’s Office at Washington, DC

May 10, 2006—Meeting with Representative from Congressman Phil English’s Office at Washington, DC

May 10, 2006—Meeting with Representative from Congressman John Peterson’s Office at Washington, DC

January 31, 2007—Meeting with Representative from Senator Arlen Specter’s Office at Washington, DC

January 31, 2007—Meeting with Representative from Senator Rick Santorum’s Office at Washington, DC

January 31, 2007—Meeting with Congressman Phil English’s Office at Washington, DC

January 31, 2007—Meeting with Congressman John Peterson’s Office at Washington, DC

2.4 Media Outreach

February 8, 2003—Media Day

Former Forest Supervisor Kevin Elliott held a media day to discuss what a Forest Plan is, the 1986 Forest Plan, the Revision process, the mission of the FS, and the need to revise the 1986 Forest Plan. He ended by inviting the media to continue their participation with the Forest Plan Revision process on the ANF.

May 19, 2006—Media Day

Forest Supervisor Kathleen Morse held a media day on May 19, 2006 in Warren, PA with local and regional media to announce the release of the PLRMP and the DEIS. This event drew newspaper, television and radio coverage from the four-county area and Erie, PA, and included interviews with the Forest Supervisor and Forest Planner William Connelly.

Allegheny National Forest Website

The ANF website www.fs.fed.us/r9/forests/allegheny has featured information on Plan Revision throughout the process, including provision of electronic copies of the NOI in 2003 and the PLRMP and DEIS in 2006. Email, phone numbers and fax numbers were posted for accepting comments. Press releases and notices of public meetings were also posted.

Newspapers

The ANF issued press releases notifying the public of the schedule and location of all public meetings listed in section 2.2 of this Appendix. Press releases were also issued to notify the public of publication of the NOI, PLRMP and DEIS, their associated comment periods and methods to comment. These notices have been featured in the Warren Times Observer, Bradford Era, Ridgway Record, Kane Republican, Forest Press, Erie Times and Pittsburgh Post-Gazette newspapers.

3.0 Response to Public Comments

This section contains the ANF response to public comments received during the comment period for the PLRMP and DEIS (May 26, 2006 to August 28, 2006). The comments were prepared for response using the process described below. Response to comments may be found in sections 3.1-3.17.

Responses include the Public Interest (PI), sample statement(s) supporting that Public Interest and the ANF response. Some sample statements are summarized by sub-interest statements that support or expand upon the primary Public Interest statement. Responses are organized by subject according to the Table of Contents and are numbered sequentially.

Content Analysis

Public comments on the PLRMP and DEIS were documented and analyzed using a process called content analysis, which is a systematic method of compiling and categorizing the full range of public viewpoints and concerns regarding a plan or project. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into the LRMP and FEIS. All comments (i.e., letters, emails, faxes, and other types of input) were included in this analysis.

In the content analysis process used for this project, each comment was given a unique identifying number, which allows analysts to link specific comments to original letters. Respondents' names and addresses were then entered into a project-specific database program, enabling creation of a complete mailing list of all respondents. The database was also used to track pertinent demographic information such as responses from special interest groups or federal, state, tribal, county and local governments. In the case of duplicative material such as form letters, only a master letter for each distinct type of form was analyzed for content. All form letters were examined for additional pertinent comments and each respondent was added to the mailing list. Excluding copies of form letters, 511 oral and written comments were received during the comment period.

All input was considered and reviewed by an analyst. Comments were then entered verbatim into the database. In preparing the final summary analysis, comments were reviewed again using database printouts. These reports track all coded input and allow analysts to identify a wide range of public concerns. The final product includes a list of public concerns and supporting sample statements taken from the comment database.

Public Interest statements are succinct statements that capture the requests of the respondents regarding the PLRMP and DEIS. Following each Public Interest statement, one or more verbatim sample statements are listed that flesh out and provide context for the views of respondents. A given Public Interest may represent only one respondent, or may represent hundreds or even thousands of respondents who articulate a similar point. Consequently, the reader should not assume that the sample statements listed are inclusive of all comments supporting a given Public Interest. Some of the sample statements included in Appendix A have been shortened to remove information that is repetitive or outside the issue indicated in the Public Interest statement. This is indicated by (...) in the sample statement. The letters from which sample statements are quoted is indicated by the Allegheny letter number at the end of the sample statement. These letters are filed in the Forest Plan Revision project record.

It is important for the public to understand that this process makes no attempt to treat comments as votes. In no way does content analysis attempt to sway decision makers toward the will of any majority. Content analysis ensures that every comment is considered at some point in the decision process.

After the content analysis process was complete, public concerns and their associated sample statements were assigned to the ANF interdisciplinary team to develop responses. Public comment was considered while making changes between the draft and final versions of the LRMP and EIS. It was also considered by the line officer in selecting Alternative Cm in the Record of Decision (ROD).

3.1 Plan Revision Process

3.1.1 Document Organization

Public Interest #1: The Forest Plan should contain standards and guidelines that are mandatory instead of discretionary.

Sample Statement: The Forest Service must make standards and guidelines in the revised plan mandatory instead of discretionary. Standards and guidelines are utilized to measure whether the Forest Service's management activities are protecting the Allegheny. If they are not mandatory, however, there is no incentive for the Forest Service to abide by these standards and guidelines. (#93)

Response: The assertion that guidelines in the ANF LRMP are voluntary, will not be met, or will be routinely violated is unfounded. The LRMP makes clear that compliance with guidelines is expected unless specific situations render compliance undesirable or infeasible. In these situations, project decisions must provide a rationale for the reasons for deviating from the guidelines. This approach of distinction between standards and guidelines has been commonly used in a number of Forest Plans (e.g. Black Hills NF Forest Plan). See p. 53 of the LRMP for a description of the role of standards and guidelines.

Public Interest #2: The Forest Plan should list all requirements as standards and guidelines and not incorporate management direction by reference.

Sample Statement: If ANF wants the public to understand what the S and G's are and how they will be applied, then the S and G's need to be listed in the plan (reference to FS Handbooks and to Pennsylvania DEP Field Guides). By not having a file to where an interested person could inquire into the proposals the needed information is not available. (#214)

Response: Unfortunately, it is neither practical nor possible to do this. The Forest Service is guided by a substantial volume of laws, regulations and policies in the Forest Service directive system in addition to the LRMP. This direction is publicly available on the web and in other forms. It is generally only referenced in the LRMP if a specific comment indicates a need to clarify the source of material that provides the direction.

Public Interest #3: The Final EIS should include a more detailed table of contents and numbered sections within the chapters.

Sample Statement: While the DEIS provides a lot of information, it is difficult to navigate the various chapters. A more detailed table of contents and numbered sections within the chapters would be helpful. (#231)

Response: A full Table of Contents with all major subheadings has been added in the front of the FEIS.

3.1.2 Decision Making Philosophy

Planning Regulations

Public Interest #4: The Allegheny National Forest should not follow the national model of forest management for completing Forest Plan Revision.

Sample Statement: The Proposed Plan follows a national model of forest management. While this model may be effective for managing other national forests, it is not an effective model to manage the Allegheny National Forest because there are unique characteristics associated with the Allegheny National Forest that simply are not present in other National Forests throughout the country...Due to these unique attributes associated with the Allegheny National Forest, a national management model that does not take into account these characteristics should not have been implemented to develop the Proposed Plan. Rather, a management strategy that takes into account the distinctive features of the Allegheny National Forest needs to be implemented in order to ensure that the benefits (economic and otherwise) associated with these distinctive features are maximized to the greatest extent possible. (#484)

Response: All National Forests follow the laws, regulations and policies of the federal government in their development of revised Forest Plans. The ANF applied a new model format for a Forest Plan under development in a variety of different National Forest settings. This model format was applied and adjusted to address the unique conditions and circumstances of the ANF including private subsurface ownership and management of forest vegetation. In addition, see response to PI #5.

Public Interest #5: The Allegheny National Forest should not combine the two sets of planning regulations.

Sample Statement: These are mutually exclusive planning rules with different standards. The 2005 planning rule introduces an abundance of discretion that did not exist under the 1982 planning rule. The Forest Service is conducting plan revision under the 1982 planning rule, not the 2005 planning rule. The PLRMP, however, states: “While proposed Plan is being developed in accordance with the 1982 planning rule, some concepts of the new planning rule are being incorporated; especially in the adoption of the new plan document format.” The Forest Service cannot have it both ways...Despite the Forest Service’s averment that only “some concepts of the new planning rule are being incorporated; especially in the adoption of the new plan document format,” it appears that the Forest Service deviates from the 1982 planning rule in many other instances in the PLRMP that were not envisioned for the transition period. For example, the 1986 Forest Plan stated that Forest-wide standards and guidelines, “apply to all management areas across the Forest. They state the bounds or rules within which management practices will be carried out to achieve the planned objectives and requirements.” This is dramatically different than the PLRMP regarding Forest-wide standards and guidelines (referred to as “design criteria”). The PLRMP says, “although both standards and guidelines are requirements that limit or guide the forest uses or activities, compliance with a standard is to be interpreted differently than compliance with a guideline. Standards are required in all applicable situations, unless a plan amendment has been specifically prepared to exempt a project from the standard. Compliance with applicable guidelines is also generally expected, but situations are anticipated when compliance may not be feasible or desirable. In these situations, the record for the project must provide documentation as to the rationale for deviating from any guideline.” There is considerable distance between defining standards and guidelines in 1986 as the “bounds or rules within which management practices will be carried out” and 2006 where “compliance with applicable guidelines is also generally expected, but situations are anticipated when compliance may not be feasible or desirable.” This change is not consistent with the 1982 planning rule. (#327)

Response: The ANF Forest Plan Revision is being completed under the regulations of the 2005 planning rule that allow plan revisions initiated prior to January 5, 2005 to be completed under the planning regulations in effect prior to November 9, 2000. This is described in the LRMP introduction (Transition to the New Planning Rule)

and in Chapter 1 of the FEIS. The Forest Plan Revision is designed to comply with these regulations. The format of the LRMP is not part of either planning rule, but the result of a FS effort to better organize Forest Plans. Other National Forests (e.g. National Forests of Southern California) have also developed Forest Plans under the 1982 planning rule in this format. To avoid further confusion, the language in the LRMP that indicated concepts of the new planning rule were being used in this Forest Plan has been removed.

The 1982 planning rule did not define standards and guidelines. As a result, National Forest Plans often define the interpretation of standards and guidelines. The distinction in the ANF LRMP that deviation from a standard requires a Forest Plan amendment and that deviation from a Forest Plan guideline is permitted based on site-specific rationale has been a common approach used in a number of national Forest Plans (e.g. Black Hills National Forest under the 1982 planning rule). This approach more clearly identifies how the LRMP direction is to be interpreted in Forest Plan implementation.

Public Interest #6: The Forest Service (should or should not) divest ownership of Allegheny National Forest lands.

Sample Statement: It is clear that the federal government does not possess the budget, human resources, or active management policy to effectively manage the entire acreage contained in the Allegheny National Forest. Therefore, the Proposed Plan must be rescinded and revised so that it sanctions the possibility of divesting the management and/or ownership of portions of the forest to either the state, local government, or private entities in the event that federal legislation is enacted which permits such a partnership between the federal government and these entities. (#484)

Sample Statement: The management of the national forest should never be divested to private enterprise. (#485)

Response: Consideration of a possible divestiture of Federal lands or transfer of their management to another government or private entity is beyond the scope of Forest Plan Revision. There is neither authorization nor requirement to consider this within the scope of Forest Plan Revision. The Forest Service has often participated in studies considering the sale or transfer of National Forest System land. These studies have been in processes outside of forest planning.

Emphasis of Revision

Public Interest #7: The Allegheny National Forest should revise the purpose and need statement for the Forest Plan to emphasize active management and even-aged management on the entire ANF.

Sample Statement: You should have a basic purpose behind the new Forest Plan and it should simply be, “No forest should be left unmanaged or mismanaged by using uneven-aged management.” It has been thoroughly established that even-aged management is the best way to regenerate the forest after the final cut. With more even-aged management you might even be able to reverse the trend of reducing Oak stands on the forest. (#480)

Response: This opinion is noted. See FEIS Chapter 2, section 2.5, Description of Alternatives Considered but Eliminated from Detailed Study (pp. 2-14 to 2-37). This proposal would not be legally implementable, as many special areas are withdrawn from the suitable land base. In addition, this proposal does not meet the desired conditions identified on pp. 9-12 of the LRMP. See the rationale for the selection of harvest methods and land management allocations in the ROD (p. 25) and in Appendix A of the LRMP.

Public Interest #8: The Allegheny National Forest should identify OGM development as a significant Forest Plan Revision issue.

Sample Statement: The Forest Service erred by failing to consider oil and gas drilling a major issue during the revision process...The Allegheny National Forest has over 8,000 oil and gas wells, more than all other national forests combined. Oil and gas drilling affects all other aspects of forest management including impacts on soils and watersheds, habitat fragmentation, displacing recreation opportunities, and reducing the amount of lands considered for Wilderness. (#295)

Sample Statement: The 1986 Forest Plan and EIS considered oil and gas a major issue. This is especially troubling as historically the Forest Service has addressed oil and gas development in the planning process. The Final EIS for the 1986 Forest Plan stated: “some issues were thought to be beyond the jurisdiction of the Forest Service, adequately covered in existing plans or laws, or best handled case-by-case in site-specific evaluations. These issues are not addressed in the Forest Plan and EIS. The remaining issues, which indicated a need to change current management direction, were then grouped into six topics of primary importance called management problems. A management problem is a statement expressing conflicting values about management of the Forest or the outcomes desired of Forest management.” The Forest Service identified oil and gas drilling as one of those “six topics of primary importance” that “guided the formulation of alternatives.” Additionally, the Forest Service developed a specific alternative that addressed the impacts of oil and gas drilling under a “high demand” scenario. This is in stark contrast to the Forest Service's conclusion in the DEIS for the revised forest plan where they state that oil and gas drilling is “beyond the scope of the forest plan.” (#327)

Response: After substantial public involvement, the Notice of Intent (NOI) for Allegheny Forest Plan Revision (September 2003) examined the six problem areas (not issues) identified in the 1986 Forest Plan. Of these six problem areas, all except oil and gas were carried forward into one of the three issues considered in the Forest Plan Revision. The reasons that oil and gas was not brought forward was that the 1986 Forest Plan already adequately allowed the ANF to acquire mineral rights and the difficulty was in the ability to acquire these rights due to limitations of funding and willing sellers, not Forest Plan direction. More practically, since oil and gas subsurface rights are owned by private interests, the ANF cannot directly control this development. Oil and gas could not be a driver in shaping Alternatives for the Forest Plan Revision. The NOI stated that the analysis of oil and gas would be displayed in the Environmental Impact Statement in terms of the cumulative effects analysis.

Since 2003, the level of oil and gas development has substantially increased on the ANF and has raised public concern about oil and gas development. The ANF Forest Plan Revision has responded to both this increased activity and increased public concern about oil and gas development in several ways. These include:

- An analysis of the cumulative effects of oil and gas development throughout the FEIS
- Addition of other goals and objectives in the LRMP related to oil and gas development and acquisition of subsurface rights (LRMP pp. 15, 20 and 21)
- Expanded standards and guidelines applicable to private oil and gas developments (LRMP pp. 90-92)
- Additional standards and guidelines on federal minerals (LRMP p. 92)

Public Interest #9: The Allegheny National Forest should identify soils and geology management as a significant issue in Forest Plan Revision.

Sample Statement: Despite widespread recognition of the importance of soils and geological formations to wildlife habitat and forest health, the Forest Service has not identified soils or geology management as significant issues to be addressed in their management plan. (#295)

Response: Management of soils and geological formations were not selected as significant issues for Forest Plan Revision as their management direction does not vary by Alternative. See response to comments in section 3.4 of Appendix A of the FEIS for discussion and references for soils management.

Public Interest #10: The Allegheny National Forest should identify watershed management as a significant issue in Forest Plan Revision.

Sample Statement: The Allegheny National Forest was founded in order to protect the upper Allegheny River watershed. However, the Forest Service has refused to recognize watershed management as a significant issue in revision of its forest management plan for the Allegheny. This needs to be corrected to ensure that biologically diverse watersheds such as Millstone Creek, watersheds recognized as High Quality or Exceptional Value under the Clean Water Act, watersheds recognized as Wilderness Trout Streams by the PA Fish and Boat Commission, and watersheds recognized as Remote Trout Streams by the Forest Service are given elevated protections and prioritized for restoration projects. (#295)

Response: Watershed management was not identified as a significant issue because it would be protected through improved LRMP design criteria (LRMP pp. 72-79) in Alternatives B, Cm, and D and did not require varied approaches between Alternatives. The riparian corridors have been increased for High Quality, Exceptional Value, Wilderness Trout Streams, Remote Trout Streams and Class A Wild Trout Streams (LRMP pp. 74-76) to be consistent with the PA Department of Conservation and Natural Resources Forest Management Plan and PA Department of Environmental Protection's Best Management Practices. In addition, see response to PI #66.

Management Philosophy

Note: see other sections of this appendix for management philosophy concerns specific to particular resources.

Public Interest #11: The Allegheny National Forest should manage with a multiple-use philosophy.

Sample Statement: The Plan should continue to promote multiple use of the ANF. Because of its high quality hardwood resources, energy resources, unique habitat and proximity to metropolitan area, the ANF has the opportunity to serve as the nation's model for a productive, multiple use forest. (#268)

Response: These opinions are noted. All Alternatives analyzed in detail promote the multiple use philosophy as directed by applicable planning laws. See FEIS, Preface, Planning Laws and National Forest Management Act Regulations (pp. 5 and 6). As described in the ROD (pp. 15-32), Alternative Cm and the LRMP were structured to provide a balance appropriate for the ANF.

Public Interest #12: The Allegheny National Forest should be managed based upon business principles and funded from revenues generated.

Sample Statement: The Allegheny has the potential to produce huge increases in revenue if the Forest Service would concentrate on redressing the age balance of its most valuable species, Cherry. It is said that every dollar invested in timber sales and sales preparation would yield a revenue of \$5 to \$10. No other activity on the Allegheny can even approach that kind of profitability. It is my opinion that the Allegheny should be run as a business, and a very profitable business at that. There should be an initial investment in the forest which would then yield considerable revenues in the future. Changing the species mix would certainly be detrimental toward reaching that goal. (#460)

Sample Statement: I think that if we manage the Allegheny National Forest like a business, we can prove that a public forest can be profitable, with increased timber sales producing the necessary investment to create substantially added revenue. In fact, I wouldn't be surprised if over a ten-year period the added revenue due to greatly increased timber sales could form the basis of the profitable operation of the entire Region 9. The construction of the new Forest Plan provides an ideal proving ground for this theory. The forest does not have

to be a financial burden. It should be a financial asset, providing raw material and jobs to local industry while providing recreation and regeneration for future generations to come. (#480)

Response: The ANF is not a business; it is a Federal government agency. As such it is funded to accomplish identified government purposes and its revenues are distributed based on the laws of the Federal government. The inherent purposes of the national forests are substantially different than those of private forests or private landowners. Despite these inherent differences, the ANF strives to improve efficiency in its management and delivery of goods and services to the American public. See ROD pp. 15-28 and 37 for the rationale for the selection of Alternative Cm and ROD p. 12 for consideration of net public benefits versus present net value. See also responses to PI #3, #14, and #123.

Public Interest #13: The Allegheny National Forest should be managed to emphasize remote recreation experiences, watershed protection, and wildlife habitat rather than profit from timber and minerals production.

Sample Statement: Please be sure that in your management plan for the Allegheny National Forest you lean towards conservation, rather than commercialism. (#143)

Sample Statement: In 1923, President Calvin Coolidge designated the Allegheny National Forest specifically for watershed protection, not timber production. Today, under the U.S. Forest Service's 1986 Forest Management Plan, the Allegheny National Forest is one of the most heavily timbered and drilled national forests in the country. The Allegheny National Forest is the only national forest in Pennsylvania. The Allegheny should be managed to provide quality remote recreation experiences, watershed protection and wildlife habitat. Unfortunately, the proposed Forest Plan and Draft EIS do not protect these values that are important to so many Americans. (#295)

Response: These opinions are noted. Alternative Cm does promote remote recreation experiences, watershed protection and wildlife habitat. Three areas are allocated to the new MA 7.2, Remote Recreation Area (Clarion River, a broader Hearts Content Area and the East Fork of Hickory Creek). These were areas of public interest that were not selected for other special area protections that also promote remote recreation opportunities. Watershed protection is emphasized in the LRMP Desired Conditions and improved soil and water standards and guidelines were added to the LRMP along with monitoring elements to evaluate the effectiveness of mitigation measures and the status of overall water quality on the ANF. The FEIS and LRMP incorporate the findings of the species viability analysis to feature wildlife habitat protections for rare and sensitive plants and animals. Vegetation management is a tool to provide desired wildlife habitats. As described in the ROD (see Decision and Rationale section, pp. 15-32), Alternative Cm and the LRMP were structured to provide a balance of habitats and appropriate uses for the ANF. For more on balancing of multiple uses, see response to PIs #11 and 12.

Public Interest #14: The Forest Plan should be based upon ecosystem management principals rather than silvicultural principals.

Sample Statement: Ecosystem management needs to be at the forefront of the planning document. The management of ANF's public forestlands must be based on ecological and biological science as opposed to silviculture in order to protect our public resources such as water quality, wildlife, fisheries habitat, and sensitive forest soils. Silviculture is the priority in the Draft. All other activities simply are being used to justify commercial logging. (#295)

Response: Ecosystem management principles were central to development of the LRMP. The desired ecosystem conditions for the ANF (see LRMP pp. 10-12) include increased diversity of vegetative conditions across the landscape, improved resiliency to impacts from insects and diseases, multiple vegetative layers and an abundance of tree seedlings, shrubs and other herbaceous vegetation present on the forest floor. ANF ecosystem resiliency would be enhanced as diverse understory vegetation and advanced tree seedling regeneration is present to replace large overstory trees as they mature and eventually die. Snags and large down wood is present to meet the needs

of wildlife. Large blocks of contiguous forest cover, along with patches of early structural vegetation, provide diverse habitat for wildlife. Desired conditions also include providing healthy aquatic and riparian systems, sustaining long term soil productivity, reducing threats from non-native invasive species and improving ecosystem sustainability.

The first goal for vegetation management on the ANF (LRMP p.14) provides for a diversity of vegetation patterns across the landscape that represents well distributed habitats, a range of forest age classes and vegetative states, a variety of healthy functioning vegetation layers, moderate to well-stocked forest cover, and the variety of vegetation species or forest types necessary to achieve multiple resource objectives and sustain ecosystem health.

Public Interest #15: The Forest Plan should give equal weight to all forest uses and resources.

Sample Statement: The FS's Draft Environmental Impact Statement for its revised forest plan states that the ANF...promotes multiple use forest...If the ANF is a multiple use forest why is such a small fraction of the ANF designated as recreational and wilderness? (#295)

Response: There is no requirement that equal weight must be given to all forest resources. As described in the ROD (see Decision and Rationale section), the selected Alternative and the LRMP were structured to provide a balance appropriate for the ANF.

Public Interest #16: The Forest Plan should equally balance the management of social, economic and ecological elements.

Sample Statement: 36 C.F.R. section 219.10 states that, "Sustainability, for any unit of the National Forest System, has three interrelated and interdependent elements: social, economic, and ecological." As such, these elements should be given equal weight throughout the planning process, and the Proposed Plan should adequately analyze each element. The Proposed Plan and accompanying Draft Environmental Impact Statement contain an in depth and long range (through 2060) ecological analysis. However, the socioeconomic analysis is short term and rudimentary at best. Moreover, the informative and analytical materials made available to the public contain significant quantities of material concerning the ecological analysis and very little material concerning social and economic matters...This inadequate analysis of the social and economic issues, especially in contrast with the ecological analysis, is inconsistent with the requirements contained in the Code of Federal Regulations. Therefore, the Proposed Plan must be rescinded and revised so that it comports with the Code of Federal Regulations by providing a long term, in depth analysis of the socioeconomic impact of the Proposed Plan. (#484)

Response: There is no requirement that the three components of sustainability should be given equal weight in either the decision or the analysis of the Forest Plan Revision process. Legal requirements mandate achievement of certain biological or ecological objectives such as protection of threatened and endangered species, clean water and diversity of plant and animal species. Similarly, Environmental Impact Statements are developed primarily to describe the effects on the environment. The FEIS does contain substantial material describing contributions of the ANF to social and economic sustainability. In addition, see response to PI #402.

Management Methods

Public Interest #17: The Forest Plan should use adaptive management principles.

Sample Statement: You must ensure the new forest plan is as flexible as possible to accommodate future threats, future technologies, future demands on the forest, and the future shortcomings of the plan that will inevitably appear. (#163)

Sample Statement: We support the use of all management tools that are available including herbicides, fencing, D-map, burning, and all silvicultural treatments. We feel that some methods not currently available

now may become available during the life of the plan and agree that all flexibility should be maintained to ensure the use of these tools for land management. We also believe the plan should ensure as much as possible the ability of land managers to address changing conditions. (#97)

Response: We acknowledge your support for using a range of forest management activities to sustain and improve forest health, including flexibility in using them to address changing conditions or to utilize new technology. We believe the LRMP provides the range of techniques (LRMP 2400 Vegetation Management, p. 19; 3400 Forest Pest Management, p. 15 and 21; 2100 Pesticide Use, pp. 54-59; 2400 Vegetation, pp. 64-72; 3400 Forest Pest Management, pp. 93-94) and the flexibility you desire (LRMP Appendix A, pp. A-1 to A-2 and A-18 to A-45). The monitoring section of the LRMP provides for monitoring and evaluation to determine whether refinements are needed to management practices (LRMP, Table 15, p. 50). Vegetation research questions (LRMP Table 16, p. 52) call for additional research that would help define or refine vegetation management tools.

Furthermore, the LRMP provides for adaptive management across all resources, as monitoring is part of an adaptive management process that evaluates the current performance of Forest Plan implementation against the desired conditions, goals and objectives identified by the LRMP. The monitoring plan identifies key questions where additional information can provide for adjusting management direction in the future.

Public Interest #18: The Allegheny National Forest should permit emergency modification of the Forest Plan in response to catastrophic dangers.

Sample Statement: Acid rain is capable of destroying tree species. Mercury pollution can kill aquatic species and negatively affect their biology. Over time, there may be climate change, with first a change in precipitation...The final plan should have options for emergency modification when there is a catastrophic danger of this type. (#19)

Response: The LRMP is designed to maintain flexibility to respond to emergencies. As noted on p. 43 of the ROD, the ANF LRMP is adaptive and subject to change as we monitor, learn and gain new information. Changes to the LRMP will generally take the form of Forest Plan amendments or corrections.

Acid deposition is discussed in the DEIS and FEIS (pp. 3-8 to 3-9, 3-19 to 3-20, 3-51, 3-52 to 3-54, 3-57 to 3-58, 3-62 to 3-63 and 3-101 to 3-102), and information about climate change has been added to the vegetation discussion in the FEIS (pp. 3-83 to 3-84). The LRMP is applicable for a planning period that generally continues for 10 to 15 years (LRMP p. 1). The LRMP can be changed at any time following its approval through administrative corrections, site-specific plan amendments or regular plan amendments (LRMP p. 5). Note the 2400 Vegetation Management goal to be responsive to emerging issues or new information relating to forest vegetation (LRMP p. 14), the 3400 Forest Pest Management goal emphasizing integrated pest management practices using the most current science and available control methods (LRMP p. 15), the vegetation monitoring question to monitor forest health (LRMP p. 50) and the adaptive approach to ANF vegetation management (LRMP Appendix A, p. A-2). Research questions related to soils and vegetation (LRMP Table 16, p. 52) may lead to changes in the LRMP.

Page 43 of the ROD describes the adaptive nature of the LRMP and amending the LRMP. For additional information, refer to the response to PI #152.

Public Interest #19: The Forest Plan should coordinate management objectives with those of adjacent landowners.

Sample Statement: The plan should better improve the coordination of its management objectives with those of adjacent landowners. ANF is a patchwork of parcels intermixed with adjoining tracts of state and private land. We recommend that the Forest Service review the plan to ensure the management objectives do not contradict the management objectives on adjacent Game Commission, Pennsylvania Department of

Conservation and Natural Resources, and private land, and consider revising management area designations, where appropriate. (#240)

Response: Coordination with adjacent landowners usually occurs at the project scale. The ANF has considered comments from other public land agencies and private landowners as part of Forest Plan revision.

3.1.3 Public Involvement

Collaboration

Public Interest #20: The Allegheny National Forest should not accept the “form-letter” resolution submitted by local municipalities and school districts and should investigate the public comment process.

Sample Statement: The FS must investigate the corruption of the public comment process. On July 25, 2006, all ANF region municipalities and school districts in Elk, Forest, McKean and Warren Counties received letters from Warren law firm Stewart & Stapleford LLC, Attorneys at Law. The letters had an attached Resolution and requested that the governing bodies and school districts pass the blind Resolution and allow an unidentified and unnamed, ad hoc committee to write detailed comments on the Forest Plan in the name of the local governing bodies and school districts. This would be a blatant attempt by a law firm to exert undue influence and usurp the Forest Plan public participation process. It raises ethical questions and violates Pennsylvania Sunshine Law requiring local governing bodies and schools boards to take action and vote on those actions at public meetings. (#295)

Response: The Forest Service accepts form letters from any and all parties wishing to comment. The process for analyzing and responding to comments has been approved by CEQ and applies to all parties who respond. Particular attention is paid to the substance of comments and their relevance, rather than to the number of any given comment.

Public Interest #21: The Allegheny National Forest should open Forest Plan documentation to public review.

Sample Statement: The Forest Service has denied [us] access to all of the underlying documents regarding this plan revision process. [We] informally requested such access, via e-mail twice, before it became clear that the Forest Service had no intention of allowing [us] to actually review the underlying files, as required by 40 CFR section 1506.6(f)...Clearly the comment period should be extended and [we] should be allowed to submit additional comments after it has had the opportunity to review the complete, underlying planning file. The Forest Service, in a letter dated August 25th has now refused to extend the comment period. (#327)

Response: Comment noted. The Forest Service delivered specified documents and stands by its written responses to these requests.

Public Interest #22: The Allegheny National Forest should emphasize the participation of local constituents in the planning process.

Sample Statement: It is the local constituents-the local residents, who best understand the social, economic and ecological needs of the forest. These local constituents have not been permitted to truly be a part of the PLANNING process-through working sessions involving discussions. Their only contributions have been, such as today, COMMENTS TO - as opposed to INVOLVEMENT IN - the Plan for the Allegheny National Forest. (#456)

Response: Throughout the collaborative process employed to revise the LRMP, the ANF has sought extensive and in depth input from key stakeholders, including the citizens of the four-county Allegheny Forest Region. This

process has included a substantial series of meetings and the consideration and adjustment of the PLRMP and DEIS in response to that solicited comment. The ANF has been clear and consistent that planning staff would be responsive to requests for meetings with stakeholder groups throughout the public involvement process. The public meetings and stakeholder meetings are documented in Appendix A of the FEIS in sections 2.2 and 2.3.5 respectively. This section (3.0) of Appendix A details the consideration of comments received.

Public Interest #23: The Allegheny National Forest should emphasize the participation of local governments in the planning process.

Sample Statement: The Federal Land Policy and management Act and 36 CFR /219.9 require that local government agencies be provided with an early, frequent, and adequate opportunity to be involved during all stages of the planning process...In reality, local government agencies were not adequately involved in the planning process until several years after initial planning activities began in 1997 and resumed in 2003...Involvement at these initial planning stages is critical as information gathered to determine Need For Change items play an important role in setting the parameters for the plan revision and in crafting the initial draft alternatives. (#333)

Sample Statement: There are 3 Local Development Districts (LDD's) of the Appalachian Regional Commission (the Northwest Commission, the North Central Commission, and the Southern Tier West) within the boundaries of the Allegheny National Forest that are federal agencies recognized as regional experts with regard to economic development...The Code of Federal Regulations specifically allows the Forest Service to include these entities as agents during the planning process and, given the expertise of these federal agencies, they should have been intricately involved in the planning process. However, these LDDs were not provided with an adequate opportunity to participate in the process. (#484)

Response: In addition to the meetings with the larger public which included local government participation, government to government consultation (independent of the larger public) began fully one year prior to the recommendation of the preferred Alternative in the DEIS. Section 2.3.4 of Appendix A of the FEIS details the meetings with local government as part of the broader government to government consultation that occurred during the Forest Plan Revision process. Given the large number of local government agencies, it is not practical for the ANF to meet individually with every agency. The ANF has been responsive to local governments or local government agencies that requested meeting opportunities on Forest Plan Revision.

Section 3.0 of Appendix A of the FEIS details the consideration of comments received by both the public and government officials. Section 4.0 of Appendix A of the FEIS contains a full reproduction of comment letters received from government entities.

Public Interest #24: The Allegheny National Forest should consider local government planning.

Sample Statement: The Federal Land Policy and Management Act, the National Forest Management Act, and the Code of Federal Regulations require that federal land use plans be coordinated with and be consistent with local plans. These provisions also require that local plans and policies be considered during the planning process and that adequate consideration be given to the impact of the Proposed Plan on the local economy and culture...The above federal laws also intimate that local goals and objectives are to be taken into account during the planning process and that the Proposed Plan should reflect these local goals and objectives to the greatest extent possible. (#484)

CONSIDER THE WARREN COUNTY COMPREHENSIVE PLAN UPDATE

Sample Statement: There are a number of issues which have been addressed in the Warren County comprehensive plan and they have been adopted by the Warren County commissioners as official position. However at this point, we are not seeing within proposed Alternative C where those issues which we have taken specific positions on relative to the Allegheny National Forest...We would really appreciate your

capacity to review Warren County's comprehensive plan and consider our position on those issues that are relative to the Allegheny National Forest. (#378)

Response: The interdisciplinary team has reviewed all county comprehensive plans, both internally and through the use of a consultant (Zinn, 2006). Some areas of potential conflict with these plans have been noted, and either been addressed in the LRMP and FEIS, or are to be addressed with subsequent, targeted analysis (see section 3.5.5, p. 3-447 of the FEIS). The interdisciplinary team has also been in dialogue with county officials regarding many of these topics for some time through government-to-government consultation, and they recognize the concerns raised by the plans and have considered in depth those concerns which are within the scope of Forest Plan Revision. For more information on this consultation, see FEIS, Appendix A, section 2.3.4.

Public Interest #25: The Allegheny National Forest should allow citizens to identify significant issues of concern for Forest Plan Revision.

Sample Statement: The Analysis Of Needs For Change for Forest Plan Revision would only consider four areas that the Forest Service selected. The only issues identified by the Forest Service were “Special Areas Designation, Recreation, Vegetation management, and Habitat Diversity.” This violates Federal Law, which allows citizens to raise any significant issues of concern for Forest Plan Revision. (#295)

Sample Statement: I have noted that past Forest Plan Revision workshops were confined to certain narrow topics of discussion. If the agenda of these workshops did not provide a clear opportunity for a citizen to discuss his/her concerns, then those concerns were not discussed. This would appear to shape the character and goals of the Draft Environmental Impact Statement options very narrowly. (#292)

Response: The Forest Service has the obligation to set the scope of the analysis. See Chapter 1 of the FEIS (pp. 1-3 and 1-4) and the ROD (pp. 9 and 10) for discussion of the scope of the revision and the decisions to be made. All public comment has been analyzed in light of the decisions to be made in the LRMP. This includes comments beyond the identified issues.

Public Interest #26: The Forest Plan should include input from national constituents.

Sample Statement: Where is the national involvement since national taxpayers have paid for eons for this land and they own it? (#44)

Response: The Forest Plan Revision process has been fully open to national level public involvement throughout, as evidenced through publication in the Federal Register of the Notice of Intent to Revise the Forest Plan on September 25, 2003. For example, comments have been received from 49 states during the official comment period for the PLRMP and DEIS.

Public Interest #27: The Allegheny National Forest should collaborate with the appropriate state and federal agencies regarding the management of invasive species and threatened and endangered species.

Sample Statement: The FS should work closely with the appropriate state and federal agencies regarding threatened and endangered species and their habitats, and the control of invasive species. (#231)

Response: The ANF does collaborate with the appropriate state and federal agencies regarding the management of invasive species and threatened and endangered species. Work with the Pennsylvania Noxious Weed Working Group, Pennsylvania Biological Survey, Pennsylvania Game Commission (PGC) and US Fish and Wildlife Service as well as many other entities is ongoing and a part of program management.

Public Interest #28: The Allegheny National Forest should work with the Pennsylvania Game Commission to manage the deer population.

Sample Statement: Active participation by the ANF with the PGC on deer management in all its forms must continue. Things are getting better and the work on KQDC by the ANF in the ANF documentation of forest deer relationships and impacts is vital to the whole state deer management program. The ANF and PGC must remain active in partnerships in all wildlife related matters from eagle nests to chipmunks so we can best serve both the public and wildlife. (#278)

Response: Our objective is to manage the deer herd between 10 and 20 deer per square mile (LRMP p. 20). At this level quality hunting experiences can be provided while sustaining healthy understories. We will continue to work closely with PGC and other partners.

Public Interest #29: The Allegheny National Forest should collaborate with the Pennsylvania Fish and Boat Commission (PFBC) on fish habitat improvement projects.

Sample Statement: The plan should explicitly state that all fish habitat improvement projects shall be developed and implemented with the cooperation and approval of the Pennsylvania Fish and Boat Commission. (#329)

Response: The ANF consults and works with the PFBC on fish habitat projects as normal practice.

Public Interest #30: The Allegheny National Forest should release monitoring data of sensitive bird species to state biologists.

Sample Statement: [We] appreciate the effort on the part of ANF staff to study and monitor the status of sensitive species such as northern goshawk, bald eagle, yellow bellied flycatcher, and Swainson's thrush in the Forest. We request that such data be made available to state biologists charged with monitoring their status on an annual basis, if not already routinely done. (#13)

Response: Nothing in the LRMP precludes ANF staff from releasing avian data to state biologists. The ANF will continue to collaborate with state biologists on wildlife research and data sharing.

Public Interest #31: The Allegheny National Forest should collaborate with Pennsylvania motorized recreation enthusiasts and organizations.

Sample Statement: The Illinois Association of Snowmobile Clubs (IASC) has reviewed the position papers from the Pennsylvania State Snowmobile Association (PSSA) filed to the Forest Service on July 15, 2003 and August 7, 2006 involving the Allegheny National Forest Plan. The IASC strongly encourages the Forest Service to involve the PSSA in this planning process to address their concerns. The PSSA has detailed many issues important to preserve the family recreation of snowmobiling yet maintain the resources for generations to come. (#253)

Sample Statement: Snowmobiler-volunteers faithfully attended Allegheny National Forest Forest Plan Revision meetings and workshops and made specific requests of issues in the Forest Plan Revision which were important to them...Key concerns voiced repeatedly by...snowmobiler volunteers were either completely absent from the 2006 Forest Plan Revision Draft Environmental Impact Statement or that the Draft Environmental Impact Statement's language was going in the opposite direction from what had been previously discussed. (#292)

Sample Statement: I encourage you to continue to work with PAOHV, the ATR and ATV Traction to incorporate the necessary changes that will provide enjoyable off-road access on the Allegheny National Forest. (#506)

Response: Some key concerns raised by the motorized recreation community are addressed in the LRMP. The LRMP has a goal to continue collaborative discussions on snowmobile trail development priorities (p. 13) and an objective to use partnerships in the development of connector trails to communities (p. 18). Similarly, a goal identifies the desire to increase the quality and quantity of all motorized trail opportunities (p. 13) emphasizing the need for a mapped, marked and maintained trail system. See section 2.0, Appendix A of the FEIS for a description of public involvement in Forest Plan Revision.

In addition, the Forest Service will undergo future motorized use analysis to comply with the Travel Management Rule (11/2005) which will involve a public participation process. This process will culminate with the publishing of a Motorized Vehicle Use Map (MVUM) indicating where motorized travel of any kind is allowed.

Public Interest #32: The Allegheny National Forest should collaborate with animal protection groups.

Sample Statement: I note no meetings with any animal protection groups like friends of animals, PETA, humane society, etc. why is that? (#44)

Response: The public has been encouraged to participate in the planning process since the beginning. These groups have not requested meetings.

Public Interest #33: The Allegheny National Forest should not rush development of a management plan for the Forest.

Sample Statement: The ANF Management Plan will affect our communities for the next 20 years. The current plan revision is 10 years late and overdue. Taking the time necessary to produce a good management direction for the ANF is justified. (#295)

Response: It is important to complete Forest Plan Revision in a timely manner. This revision began in 1997, only to be stalled. The process was resumed in 2003 with a formal Notice of Intent to Revise the Forest Plan in 2003. Completion of the revision in 2007 is not a rushed development.

Public Interest #34: The Allegheny National Forest should extend the comment period.

Sample Statement: I am asking that you authorize a longer public comment period and allow more public comment before the proposed Plan is finalized. (#210)

Response: This opinion is noted. The legal comment period on the PLRMP and DEIS ran from 5/26/2006 to 8/28/2006.

Public Interest #35: The Allegheny National Forest should develop a plan revision newsletter to be made available to the public via the Forest's website.

Sample Statement: Reviewing the Hiawatha Forest Service Web Site reveals a Plan Revision Newsletter to keep the public informed and engaged in the planning process. No such process existed during the ANF Revision Process. Long periods of time existed between meetings without any process in place to keep the public informed and engaged in issues (#295)

Response: Section 2.0 of Appendix A of the FEIS describes the public involvement process used to complete the revision for the ANF. This has included maintaining a website with materials about Forest Plan Revision. The ANF did not prepare a regular newsletter as part of its revision effort. Periods of time between public updates were periods used by the ANF to prepare materials for public participation or review. Key periods of participation were supported by news releases and website postings of materials.

Public Meetings

Public Interest #36: The Allegheny National Forest should use public meetings to facilitate a consensus of public opinion on management direction.

Sample Statement: These public meetings that were held gave the ANF much feedback to a wide variety of individual and organizational desires and values. I do not think they helped the public to come to a desired level of commitment to a plan for the future management of the ANF. A process to allow the public to come to some general consensus of the future direction before alternatives were formed, would have taken more time and may have been more “messy”, but would have ended up in a stronger public consensus for future management of the ANF. This in turn would have built strength for future actions and political will to fund and implement those needed activities. (#214)

Response: This opinion is noted. See Appendix A of the FEIS, section 2.0 for details on the public involvement process. The public meetings accomplished several objectives including: information exchange to improve understanding and allow for open dialogue on key issues with the planning staff, lay out background information on the planning process and key decisions to be made, and raise the level of meaningful public comments on the proposal for the line officer to utilize when weighing tradeoffs in the final decision.

Public Interest #37: The Final EIS should include public comments from the 2005 public meetings.

Sample Statement: Citizen comments from the only two meetings held in all of 2005 disappeared and were never placed on the ANF Plan website...Citizens are demanding that those comment cards and letters be located, posted on the FS Plan website, made part of the official record for Plan Revision, and amend the Draft Plan accordingly prior to any attempts by the FS to close the public comment period. (#295)

Response: The referenced comments and responses are posted on the ANF website and are part of the project record.

Public Interest #38: The Final EIS should include and consider public comment made at the 2006 Forest Plan Revision public information meetings.

Sample Statement: Only 203 citizens out of a possible 12 million in PA attended the 7 information meetings held between May 22 and June 6 of 2006 on the Draft Plan. The FS recorded none of the citizen comments on the Draft Plan at these information meetings. (#295)

Response: Written comments were received at these meetings. These comments were treated as official comments for the PRLMP/DEIS comment period and are in the Forest Plan Revision project record.

Public Interest #39: The Allegheny National Forest should hold additional public meetings at more accessible times in more accessible locations.

Sample Statement: The recorded record clearly shows the inadequate attendance by citizens at revision meetings due to the Forest Service's failure to hold public meetings at accessible times and locations for the users of the ANF to attend. (#295)

Sample Statement: Our members, who are represented both individually and by group membership, are proposing that the management team of the ANF take a long hard look at ...conveying another series of public hearings on the draft, perhaps in Erie, Pittsburgh, or even Buffalo, at times when users of the ANF can attend (non working hours). (#437)

Response: The various public meetings held widely across the Commonwealth are but one mechanism for public involvement in the revision of the LRMP. Many citizens representing a wide range of interests have participated effectively, in groups or as individuals, through written comments, both electronic and hard copy and networking

with others. Public meetings were never offered singularly, but in groupings of two, three or more to permit attendance in alternative locations. See section 2.2 of Appendix A of the FEIS for a listing of these meetings.

Public Interest #40: The Allegheny National Forest should hold public involvement meetings in the broader region from where the ANF draws most of its users for recreation.

Sample Statement: The Draft Analysis of Management Situation Summary points out that, “the broader region from which the Allegheny National Forest draws most of its users includes the metropolitan areas of Pittsburgh and western Pennsylvania, Cleveland and northeastern Ohio, and Buffalo and western New York”. (pg. 88) Yet throughout the entire “public involvement” process beginning with the scoping, there have been no meetings, collaborative learning workshops, or public hearings in any of these metropolitan areas. Therefore, I recommend that the public comment period be extended in order to hold public hearings in these areas because as Appendix A states, “the success of the Forest Plan revision depends on collaboration between various stakeholders”. It is important, therefore, to get public input from where the Forest “draws most of its users” for recreation. (#236)

Response: The statement shared from the Draft Analysis of Management Situation Summary, “the broader region from which the Allegheny National Forest draws most of its users includes the metropolitan areas of Pittsburgh and western Pennsylvania, Cleveland and northeastern Ohio, and Buffalo and western New York” (p. 88) was not correct. This was a draft publication early in the process and subsequent findings revealed that the vast majority of users come from Elk, Forest, McKean and Warren Counties. This has been changed in the analysis in the FEIS based on the 2001 National Visitor Use Monitoring Data. The current primary user base is the 4-county area of the ANF. See FEIS, Chapter 3, section 3.4.1 Recreation Opportunities and Forest Settings – National Visitor Use Monitoring Survey Results and Market Area (pp. 3-296 and 3-297) and Forest Trends (p. 3-310). These sections in the FEIS do address visitor use from outside the 4-county area.

Meetings were held broadly throughout Pennsylvania, including locations in Erie, Harrisburg and near Pittsburgh.

Public Interest #41: The Allegheny National Forest should have presented more detailed information on streams at public meetings.

Sample Statement: Information on the cultural and geologic history of streams in the ANF, stream water quality classifications, chemical analysis and biological capacities was non-existent or unavailable at the Draft Plan information meetings for the public to gain an understanding of the importance of these water resources. (#295)

Response: The ANF did provide information on water resources at various meetings. At public meetings, changes to the PLRMP regarding water resources were also discussed, including the riparian corridors. Detailed technical information was generally not presented at public planning meetings. However, citizens could always request this type of information.

3.1.4 Use of Science

Public Interest #42: The Final EIS should be based on analysis from researchers rather than on analysis from practicing foresters.

Sample Statement: One noted problem is a communication problem between researchers and practicing foresters...My comment is that the mandates themselves are created out of the ignorance of tree biology. (#274)

Response: Chapter 4 of the FEIS lists the team of Forest Service associates representing a broad spectrum of disciplines that were responsible for writing and compiling the planning documents. It also provides a summary of

their education and their considerable amount of professional experience. Others who provided assistance and support included every employee of the ANF, the ANF Leadership Team (for instrumental guidance during the process), Forest Service research associates and a number of Regional Office and Washington Office employees. Species expert consultations are shown in Appendix E. Section 2 of Appendix A provides a summary of stakeholder involvement.

Communication between ANF personnel and appropriate researchers occurs frequently. Please note the lengthy list of reference documents, including many research publications, in FEIS Chapter 7, Appendix G1, Appendix G2, and Appendix E. Also note numerous “personal communication” references in the text of the FEIS and LRMP. ANF annual monitoring reports (FEIS Chapter 7, for example see USDA-FS 2004c) have documented administrative and research studies that have involved both ANF and research personnel. In addition, see response to PI #43.

Public Interest #43: The Final EIS should be based on current science.

Sample Statement: Pg. ES-1 talks about “NEW” science, but the bibliography you list seems to be 95% more than twenty years old. 1986 was a far different Pennsylvania than 2006 is. Projecting to 2016 or more from 1986 info is not sound science at all...Pg. 3-8 citing 1984 studies as being indicative of vegetation issues where 20 years of acid rain, global warming/global dimming, toxic herbicide application use and increasing exotic invasives have proliferated is far more indicative of what is happening at Allegheny...Pg. 3-125 - Tilghman study from 1989 is 17 years obsolete...Pg. 3-198 - the study done by northern forest lab is very very questionable to me...Pg. 7-7 - to take a soil survey from 1984 and say it has meaning for 2016 seems unscientific to me...On page 2-84 beech bark disease is claimed to kill trees in 1985 and still the forest service knows nothing about it. (#44)

Response: A number of publications and resource personnel were consulted during the Forest Plan Revision process. Communication between ANF personnel and appropriate researchers occurs frequently. Please note the lengthy list of reference documents, including many research publications, in FEIS Chapter 7, Appendix G1, Appendix G2, and Appendix E. Also note numerous “personal communication” references in the text of the FEIS and Forest Plan. ANF annual monitoring reports (FEIS, Chapter 7, for example see USDA-FS 2004c) have documented administrative and research studies that have involved both ANF and research personnel that have occurred here on the ANF. Older publications are referred to if the information is still relevant and accurate, or no new information is available that would be more current than that cited in the FEIS. We reject the implication that research published previously is incorrect. Unless more recent studies show results that conflict with older findings, the older findings are considered valid, within whatever the limitations of the methodology of the day were.

References were selected for their relevance to particular topics. Efforts were made to utilize the most current science available, including conducting literature searches and reviewing numerous scientific publications during the Forest Plan Revision process. As can be seen in Chapter 7, a wide range of publication dates, from the year 1751 through 2006, were referenced. In addition, more current literature was added between Draft and Final EIS, including a number of publications from 2006. The ROD discusses the use of science during development of the LRMP and associated FEIS (see ROD, Data Quality Act section, p. 40).

SPECTRUM modeling was used to project potential activities that would occur on the ANF in each of the Alternatives, and incorporated information from local research, scientific publications, past trends and professional experience.

Page 3-125, DEIS—The Tilghman study from 1989 is relevant as it is part of the discussion that focuses on the long term effects of a legacy of deer browsing impacts that have occurred for over 80 years on the ANF.

Page 3-198, DEIS—The Herbicide Diversity Study was conducted as an outcome of the 1991 Herbicide Use for vegetation management EIS. This is a cooperative research project between the ANF and the Northeastern Research station looking at potential impacts to herbaceous plants and animals with a grant from the National Agricultural Pesticide Impact Assessment Program (NAPIAP) from the U.S. Department of Agriculture. This study is still in progress.

Page 7-7, DEIS—A soil survey contains information on the prediction of soil behavior, limitations, hazards and inherent soil properties and summary maps. Site specific project planning refines the mapping. For example, information on changes from atmospheric deposition would be provided outside the scope of a soil survey. However, the basic soil information remains valid.

Page 2-84, DEIS—As suggested by the respondent, information gaps do exist relative to beech bark disease. However, the science with regard to this introduced insect is evolving. In the FEIS we have included information from a 2004 symposium of scientists and land management practitioners on beech bark disease. In addition, please note that a research question related to sustaining American beech that is resistant to the beech bark disease on the ANF is included in the monitoring section of the LRMP (see table 16, p. 52).

Public Interest #44: The Allegheny National Forest should establish an independent science committee to incorporate current science into the Final EIS.

Sample Statement: The FS has refused to create an impartial “Science Committee” independent of the Forest Service to incorporate “all of the current science” into the Forest Management Plan...The FS cannot develop a new management Plan without including “all of the existing science.” The science driving the current plan is 20 years old. Science Committee - The Draft Plan completely ignores that there is no formal process for citizens to incorporate current science into the Forest Management Plan. I am formally requesting that an impartial Science Committee be formed independent of the FS to incorporate “all of the science” into the Forest Management Plan. Citizens have been making this request since the beginning of the planning process. (#295)

Response: The FEIS has examined and documented the scientific foundations of the LRMP. Throughout the planning process, citizens have corresponded with the ANF, identifying science to be considered in the planning process. The ANF has considered that scientific information in preparing the FEIS. There is neither a need nor requirement to convene a science committee as another step in the Forest Plan Revision process. See the ROD for a discussion on the use of science during development of the LRMP and associated FEIS (see ROD, Data Quality Act section, p. 40).

See also response to PI #43.

3.1.5 Agency Funding and Staffing

Public Interest #45: The Final EIS should include a more realistic budgetary discussion tied to Forest Plan implementation.

Sample Statement: The Forest Service has a responsibility to create and disclose to the public a realistic set of alternatives and attendant effects. In this case “realistic” means alternatives that are tied to a realistic budget and a realistically sized forest staff. We believe that the Allegheny NF has failed to do this. (#443)

Sample Statement: Interestingly, the Planning Committee openly admits that, due to current budgetary constraints, it is not possible to harvest even the 56 MMBF per year as proposed by Alternative C. The proposed ASQ is based on an approximately 40% increase in budget, yet the Proposed Plan contains no evidence that this increased funding will occur or from where it will come. Based on the current budget, an annual offer/harvest volume of 25-30 MMBF per year is the level that the Forest Service itself claims is an

appropriate figure. Given the uncertainty associated with the budget that will be available, the Proposed Plan must be rescinded and revised so that it adequately sets forth a realistic socio-economic scenario based on past budget allocations (for example the last 5 years adjusted for inflation) as permitted by the National Forest Management Act. This is, after all, the current budget reality. (#484)

Response: Executive Branch budgets are determined by Congress and cannot be pre-determined at the time of planning. Alternatives in the FEIS are compared at full-funding assumption for timber and other resource programs. That way, maximum environmental effects are analyzed and revealed at this level of implementation. If Congress chooses to fund implementation at a lower level, effects will not exceed those disclosed and analyzed in the FEIS. If Congress chooses to fund implementation at the level analyzed in the FEIS (ASQ in the case of timber), then effects will have been disclosed and analyzed appropriately. If Congress chooses to fund implementation at a higher level, then a new or supplemental EIS and NEPA decision will be required. Court decisions have made it clear that ASQ is not a target, it is an upward limit to timber harvesting and effects analyzed in an EIS.

Public Interest #46: The Final EIS should disclose the funding and staffing requirements of each Alternative.

Sample Statement: Quantifying Budget and Staffing Needs - We believe the Forest must quantify and disclose not only the budgets needed but the staffing by resource area necessary to implement each alternative. This information is commonly presented in Appendix B of the DEIS. (#443)

Sample Statement: Current Alternatives and Resource Areas Other than Timber Table B-45 (page B-64) points to a further set of problems with the current alternatives. First of all, details of the table are unclear. Are we to assume that dollar amounts are in thousands? Is it also correct that these figures are average annual amounts for a twenty year period arrived at by averaging projections for the first fifteen years of that period? Why not use all twenty years? What was the discount rate applied? Four percent or some other “local” figure?...Given this, the Forest needs to prepare and disclose accurate budget and staffing levels for each alternative. (#443)

Response: Material has been added to Appendix B of the FEIS (pp. B-78 to B-81) to display greater detail of the budget assumptions of the FEIS Alternatives. In addition, see response to PI #45.

Public Interest #47: The Allegheny National Forest should seek funding sufficient to fully implement the plan.

Sample Statement: The Forest Service must maximize and improve its budget to ensure full implementation of the Plan. The habitat and vegetation management activities incorporated with Alternative C are extensive and will require significant funding above the ANF's current budget to implement...Given that the value of the forest products on the ANF is unique to the National Forest system, we recommend exploring the option of retaining more of this revenue on the ANF. (#240)

Response: Budget allocation decisions are not part of the decisions of the LRMP, but are part of the annual federal appropriations process. Some receipts from timber sales are available to the ANF through Knutson-Vandenburg Act of 1930 and other forest management improvement funds. Others are returned to the public in the form of Payments in Lieu of Taxes, 25% Funds or Secure Rural Schools program funds. Additional avenues to retain funds on the ANF are the subject of decisions by Congress and not a subject the LRMP can address. The ANF will continue to work on developing funding support for timber and other programs which benefit the land and the people of the region. The ANF will also explore other means (such as stewardship contracting) or partnerships within its authority to achieve implementation of the LRMP. In addition, see response to PI #48.

Public Interest #48: The Forest Plan should include revised objectives that allow the use of alternative management tools to supplement the resources available to the Forest.

Sample Statement: It has been evident that the federal government has not made the financial resources available to effectively manage the entire acreage contained in the Allegheny National Forest, as shown by the inability of the ANF to complete scheduled timber harvests and the deterioration of ANF recreation facilities and forest roads. The Proposed Plan bears an admission of this situation by listing an Objective to “reduce backlogged and deferred maintenance by 10 percent annually.” Moreover, in order for the ANF to make the desired contribution to local economies, it is not enough to perform “maintenance”; new investments in forest infrastructure and management capabilities are needed. Therefore, the plan should be revised to recognize the gap between Plan Objectives and the resources available to meet those Objectives. This can be accomplished by identifying and expressing the desire to utilize alternative management tools, such as stewardship contracts, partnerships with other government agencies, and private sector leases - all practices utilized throughout the Forest Service system - that will increase the level of resources available to the ANF. (#333)

Response: Stewardship contracting, partnerships with other government agencies and private sector leases are tools available to the ANF to achieve implementation of the LRMP desired conditions, goals and objectives. The LRMP neither mandates nor limits the potential use of these management tools.

Public Interest #49: The Allegheny National Forest should emphasize funding and staffing:

FOR WILDLIFE HABITAT RESTORATION

Sample Statement: Expenditure of public funds intended to enhance the tourist value of the ANF's public lands must make the preservation and restoration of wildlife habitat a top priority, as recommended in the wildlife habitat report commissioned by DCNR, the Governor's Sportsmen's Advisory Council, the Fish & Boat Commission and the Game Commission. (#295)

FOR PROTECTION OF STREAMS

Sample Statement: While I find the “preferred alternative” to be a good plan, I do feel that the allocation of resources is somewhat skewed. It seems to me that ...protecting and ensuring the quality of streams on the ANF should be a priority. This is most certainly not reflected in budgetary allocation. (#196)

FOR RECREATION

Sample Statement: The USFS must allocate funds for recreation equal to other uses on the ANF. This new priority should be incorporated into the 2006 ANF FPR. (#325)

FOR OVERSIGHT OF OGM DEVELOPMENT

Sample Statement: Funding must be approved to cover the increased amount of oversight that must happen relating to the OGM activity, ever increasing on the Forest and the aftermath that most certainly will have to be dealt with in the future. (#293)

FOR PROTECTION OF CULTURAL RESOURCES

Sample Statement: The plan needs to address the lack of personnel available to enforce the plan, uphold federal and state law, and protect any perceived properties that may be culturally relevant to the Seneca Nation. All site locations should possess some minimal and maximum protection requirements from looters, vandals, or other types of disruption. (#503)

Response: Budget allocation decisions (and the resulting staffing levels) are not part of the decisions of the LRMP, but are part of the annual federal appropriations process. Material has been added to Appendix B of the FEIS (PP. b-78 TO b-81) to display the budget assumptions of the Alternatives. In addition, see response to PI #47.

3.2 Plan Alternatives

3.2.1 Range of Alternatives

Public Interest #50: The Allegheny National Forest should offer a broader range of Alternatives that places current planning conditions in the center of the process.

Sample Statement: Rather than having the current planning conditions at the center of the process with potential options extending to either side, the process placed the current plan at the beginning of the spectrum with only one direction to go. The result is production minded advocates have nothing to gain, but can only hope to minimize their losses. On the contrary, preservation minded advocates have nothing to lose and can only enhance their position if the plan deviates at all from its current form. (#462)

Sample Statement: I just wanted to say that I reject all four of the options proposed in the Draft Environmental Impact Statement. I believe that they are polarized between environmental and industrial interests and this is an example of a bias on the part of the Forest Service personnel. (#408)

Sample Statement: Initially we were told that the current plan was pretty good, needed some minor adjustment but that the new plan was not going to be a complete rework of the plan... If that were the case the plan and alternatives would look something like this: The current plan would be in the middle. It would truly be a starting point.

To one side of that would have been an aggressive alternative that possibly would have addressed recreation. That alternative could have had a well thought out, ATV trail development that would have been world class and mitigated the ecological impacts that we are seeing in off trail use...It would have allowed for private sector development to spring up to meet and expand those needs...A great recreation alternative could have had small cabins along the reservoir that would have allowed for a higher level of amenity than the current camping allows for...

Another alternative could have been an aggressive forest management alternative that would have allowed for a strategy to balance the age class distribution. We have a predominately mature forest that under the proposed plan would project a change from 7 to 9% in early successional age class in the next plan and beyond (50 years)...It would have ensured the perpetuation of the Allegheny Hardwood forest type...

Both of these alternatives would have provided enormous economic stimulus and benefit to the forest and the region. Then you could have the current plan in the middle. Along with that a more conservation alternative that would have allowed for landscape corridors, riparian buffers etc. A fifth alternative could have been a more aggressive preservation alternative that would have had additional wilderness designated etc. (#97)

Response: All of the Alternatives began with the 1986 Forest Plan and considered modifications to meet the purpose and need identified based on the issues. In the initial investigations, the interdisciplinary team did expect that Alternative A would be a “middle” Alternative. The main reason this did not occur was that the major opportunities to expand developed recreation opportunities or timber harvest above the levels of the 1986 Forest Plan encountered limitations based on land capability, policy requirements (such as protection of species with viability concerns) or limitations inherent to the nature of forest planning. Conversely, in approaching problems of oil and gas and wilderness there are also limitations in how far Alternatives should reasonably explore. See the Decision and Rationale section in the ROD for the rationale on the selection of Alternative Cm.

Public Interest #51: The Allegheny National Forest should implement an Alternative that provides for fewer wilderness and remote recreation areas.

Sample Statement: We do not support any additional wilderness at this time. We feel that the additional remote recreation designations are excessive. There is no logic to the designations across the alternatives. 0 or 1 in alternatives A and B, then 5 and 6 in C and D. Would not a more appropriate balance have been 2 or 3? (#97)

Response: The ANF changed the preferred Alternative between the draft and final version based on public comment received on the draft and changed conditions on the ground. This resulted in a change from 5 remote recreation areas to 3 remote recreation areas. It maintained 2 wilderness study areas (WSA), although Tracy Ridge was replaced with Minister Valley as a WSA. We felt this provided a range of opportunities that addressed those who wanted more of these designations and those who wanted less or none. In addition, see the ROD (pp. 16-20).

Public Interest #52: The Allegheny National Forest should develop an Alternative that features a program to acquire subsurface mineral rights.

Sample Statement: Of course, we would hope that a comprehensive look at the cumulative problems caused by oil and gas development would lead the Forest Service to change its policy in the ANF and begin to take the steps necessary to acquire mineral rights as the only permanent way to reduce its impact in the Forest. Yet even without choosing such an alternative, we believe that the current and reasonably certain future situation in the Forest warrants that such an alternative be proposed and analyzed for the information of decision-makers and stakeholders. Not only is such a reasonable alternative mandated by NEPA, it is also required by the Forest Service planning regulations. The regulations governing the formation of alternatives for NEPA analysis require that alternatives “provide different ways to address and respond to the major public issues, management concerns, and resource opportunities identified during the planning process.” (36 CFR section 219.12(f)(4)(2000)) Yet no alternative in the DEIS provides a different way to address oil and gas development. (#327)

Response: Changes have been made between DEIS and FEIS to highlight goals and objectives for subsurface acquisition in all Alternatives in the LRMP (p. 21). See FEIS Chapter 3, Minerals and Geology, Potential for Federal mineral acquisition (p. 3-7). The level by Alternative varies with the acreage in MAs identified for potential acquisition. For more information, see response to PI #94.

3.2.2 Alternative A

Public Interest #53: The Allegheny National Forest should choose Alternative A.

TO SUPPORT THE LOCAL ECONOMY

Sample Statement: Our organization specifically supports Alternative “A” Existing Plan Management. This alternative produces the most jobs, contributing more to the local economy than any of the other choices. The current wood products industries are estimated to account for 10% of the region's total sales and 7% of the total employment. It is extremely important to maintain or increase these numbers...A balanced mixed use has been working and will continue to work for the Allegheny. We feel that there must be a balance between those who live in the region and drive the local economy and those who only visit the region for recreation and tourism. Both groups provide valuable revenues, but supporting taxes for local government, school districts and long term maintenance of roads and bridges falls back on the local officials who are struggling to maintain budgets and support staff. (#174)

TO ENHANCE FOREST HEALTH

Sample Statement: To achieve the proper management, the plan must include the maximum amount of sustainable forest lands of acres needed which would be 386,595 acres in the proposal Alternative A. This many acres is needed to assure flexibility within the plan. The flexibility is needed to address the concerning issues of forest health. The first being deer browse, invasive species, the lack of structure from early successional forests and other threats that kill our trees as beech bark, hemlock, oleandrin and the emerald ash borer. (#399)

Response: These opinions are noted. Alternative Cm was chosen since it best addressed the purpose and need for Forest Plan Revision. See the Decision and Rationale in the ROD (pp. 15-32) for choosing Alternative Cm and for short comings of this Alternative identified under the section Why not Alternative A (p. 30).

TO SUPPORT THE LOCAL ECONOMY – see additional information on support to the local economy in response to PIs #401 and 402.

TO ENHANCE FOREST HEALTH – see additional information on forest health in response to PIs #147, 158, and 159.

Public Interest #54: The Allegheny National Forest should develop and select an Alternative that combines Alternatives A and B.

Sample Statement: [We] do not support the preferred alternative nor do we support the even more non-productive alternative D. As it currently stands, alternative A would be the most deserving among those presented although alternative B would be supported provided certain conditions in the proposal were reconsidered such as the extent of late successional linkages and remote recreation areas along with the reduction in uneven-age management. Best case scenario would be a hybrid of alternative A and B and the coalition would encourage the Planning Team to consider such an alternative for the FLRMP. (#462)

Response: These opinions are noted. Alternative Cm was chosen since it best addressed the purpose and need for Plan Revision. See the Decision and Rationale in the ROD (pp. 15-32) for choosing Alternative Cm and for short comings of Alternatives A and B identified under the sections Why not Alternative A and Why not Alternative B (pp. 30 and 31). See additional information on extent of late successional linkages in response to PIs #222, 223 and 225. See additional information on the extent of remote recreation areas in response to PI #315. See additional information on reduction in uneven-age management in response to PIs #149, 150 and 151.

3.2.3 Alternative B

Public Interest #55: The Allegheny National Forest should choose Alternative B.

TO IMPROVE FOREST HEALTH AND CREATE DIVERSE WILDLIFE HABITAT

Sample Statement: We support the goals stated in Alt B versus Alt C. Alt B provides the largest suitable acreage for timber management, and directs up to 20% of the forest into uneven aged management. This will enhance wildlife habitat diversity. We need a viable, healthy forest that still produces a timber harvest. (#100)

TO BENEFIT THE LOCAL ECONOMY

Sample Statement: We support Alt B over Alt C for Allowable Sale Quantity (64MMBF/year) for timber harvesting. This alternative would go further in the effort to provide the timber needed to support the economy and business needs of the area. In the past, from 2001 to 2005, the ANF has only offered an average

of 20.7 MMBF per year, which is a way below the capacity of the Forest. In order to obtain the greatest economic value from the timber, it must be harvested at the proper time. (#203)

Sample Statement: The plan B has the capacity to generate 85 million dollars plus of labor income and 15.6 million dollars of local income to the school districts. These incomes are very important and substantial to the survival of the communities in the Allegheny National Forest. (#418)

TO EMPHASIZE DEVELOPED RECREATION

Sample Statement: Tourism and recreation need to be recognized as an important economic factor in the forest. It appears that developed recreation has not received a priority in the Plan as presented under Alternative C, as only 1,477 acres within the 513,000 acre forest are listed as MA 7.1 for developed recreation...We support the increase in developed recreation as presented in Alternate B, which increases developed recreation to 1,772 acres. (#202)

TO LIMIT UNEVEN-AGED MANAGEMENT AND LATE STRUCTURAL LINKAGES

Sample Statement: The uneven aged silviculture systems employed in MA 2.2 are not proven successful techniques. The forest should invest lands in MA 2.2 at the Alt. B level until more research is completed on the effectiveness of MA 2.2. (#216)

Response: These opinions are noted. Alternative Cm was chosen since it best addressed the purpose and need for Plan Revision. See the Decision and Rationale in the ROD (pp. 15-32) for choosing Alternative Cm and for short comings of this Alternative identified under the section Why not Alternative B (p. 31). More specific elements are addressed below:

TO IMPROVE FOREST HEALTH AND CREATE DIVERSE WILDLIFE HABITAT – see additional information on forest health in response to PIs #147, 158, and 159. See additional information on diverse wildlife habitat in response to PIs #202 and 211.

TO BENEFIT THE LOCAL ECONOMY – See additional information on benefits to local economies in response to PIs #401 and 402.

TO EMPHASIZE DEVELOPED RECREATION – MA 7.1 was increased to 1,772 acres in Alternative Cm. See additional information on developed recreation in response to PIs #337, 338 and 377.

TO LIMIT UNEVEN-AGED MANAGEMENT AND LATE STRUCTURAL LINKAGES – See additional information on uneven-aged management in response to PIs #148, 149, 150 and 151. See additional information on late structural linkages in response to PIs #222, 223 and 225.

3.2.4 Alternative C

Public Interest #56: The Allegheny National Forest should choose Alternative C and fully implement it.

TO MAINTAIN BALANCE BETWEEN MULTIPLE USES

Sample Statement: Among the alternatives presented by the Plan, the preferred alternative, Alternative C, offers a balanced, science-based consideration of the wide range of uses and values of the forest. This alternative represents a reasonable approach for addressing the contentious resource management conflicts that have polarized the management of this forest over the years. As such, we support the Plan premised upon the adoption of Alternative C. Importantly, Alternative C proposes to more than double the lands protected as

Wilderness while also precluding road construction and timber harvesting in the inventoried roadless areas. The disposition of the 34,000 acres originally designated as roadless will grow to over 46,000 acres proposed for roadless management under Alternative C. Alternative C also outlines a balanced approach to timber harvest, and the plan's full implementation will represent a significant increase in activity compared to recent years, aiding in the achievement of many Plan objectives and providing economic benefit to surrounding communities. (#246)

FOR WILDERNESS STUDY AREAS AND REMOTE RECREATION AREAS

Sample Statement: I am very pleased that the Heart's Content area, Minister Valley, Morrison Run area, and Clarion River area have been included as Remote Recreation Areas, and Tracy Ridge and Chestnut Ridge are Wilderness Study Areas. These are some of my favorite places to pursue remote, non-motorized recreation. Please do not change these designations. (#262)

Response: These opinions are noted. See Decision and Rationale in the ROD for selection of Alternative Cm (pp. 15-32). We support full implementation of the LRMP. See Appendix B (pp. B-78 to B-81) for information on the projected budget needed for full implementation. More specific elements of change between Alternative C and Alternative Cm are addressed below:

TO MAINTAIN BALANCE BETWEEN MULTIPLE USES – the changes made in the Selected Alternative Cm did not alter the intent or balance provided and analyzed in the Alternative C in the DEIS. That is the rationale why an Alternative Cm replaced Alternative C.

FOR WILDERNESS STUDY AREAS AND REMOTE RECREATION AREAS – The following changes to the Remote Recreation Areas have been made in the selected Alternative Cm: The bulk of the Minister Valley Area has changed to Wilderness Study MA 5.2, with the area west of FR 420 changed to MA 3.0 (roughly 2000 acres). This area contains some key long term oak research units where additional vegetation treatments are needed to fulfill the research study, which has been underway for over 15 years. Morrison Run Area has been changed to MA 2.2 Landscape Linkages, due to the current oil and gas development. MA 2.2 will have a mix of even-aged management (primarily for oak), uneven-aged management to provide late structural values, and no active management where road access does not exist.

The Tracy Ridge Wilderness Study Area has been changed to MA 8.2 its current congressional designation of National Recreation Area. This designation is consistent with providing remote recreational opportunities.

3.2.5 Alternative D

Public Interest #57: The Allegheny National Forest should choose Alternative D.

TO INCREASE WILDERNESS AND REMOTE RECREATION AREAS

Sample Statement: I prefer alternative D because it contains the largest proportion of wilderness lands. We need to preserve the maximum amount of pristine wild lands because they have multiple uses that cannot be recovered if the character of these lands is altered. (#31)

Sample Statement: I support the designation of the Tracy Ridge, Chestnut Ridge, Minister Valley and Allegheny Front areas as wilderness study areas as proposed in Alternative D. I further support the protection of the Remote Recreation Areas as proposed in Alternative D. (#235)

TO INCREASE LATE SUCCESSIONAL AND STRUCTURALLY COMPLEX HABITAT

Sample Statement: In general, the overall designations and management approach detailed within Alternative D addresses, to a greater extent than Alternative C, a number of our concerns. The larger number of areas given a special designation and greater proportion of late successional and uneven age management throughout the forest within Alternative D builds more resilience into the system and provides more opportunity to accommodate natural disturbances, better ensuring that the goal of a mixed aged class forest with upwards of 25% mature, structurally complex forest is attained. (#95)

Sample Statement: Increase the acres managed with an emphasis on Habitat Connectivity with an emphasis on core areas. Alternative D has 6,000 more acres than the preferred alternative in MA 2.2, and 19,000 more acres managed as core areas. Alternative D widens the late structural linkages over the preferred alternative, and increases the number of connectors and remote recreation areas (MA 7.2). The size of the Bluejay/Duhring IUA is reduced to protect the goshawk and rattlesnake habitat. Amend the preferred alternative to increase the emphasis on Habitat Connectivity as proposed in alternative D. (#138)

Sample Statement: [We] recommend that Alternative D be chosen as the preferred alternative. The larger Management Area 2.2, Late Structural Linkages, focus on uneven-aged management, and designated wilderness/wilderness study and remote recreation areas proposed in Alternative D would provide greater protection for aquatic resources, increase interior forest habitat linkages, decrease habitat fragmentation, and increase currently limited old-growth and late-successional habitat on the forest. (#159)

TO BALANCE ECOLOGICAL FUNCTION AND ECONOMIC USES

Sample Statement: Alternative D provides the best compromise between ecological values and economic uses of the forest. This is the only alternative that spatially plans for a mosaic of late-successional forests throughout Allegheny National Forest, with considerations for buffering least intensive uses and connecting them with other similarly managed areas. (#331)

TO EMPHASIZE UNEVEN AGED MANAGEMENT

Sample Statement: Beyond the amount of land designated for wilderness we are very concerned about the over-emphasis on even aged management in the Forest Service's preference for Alternative C. The greater emphasis on uneven aged timber harvesting methods that are more in harmony with natural processes in Alternative D would provide additional protection for the recreational opportunities and unique character of the ANF. (#65)

TO REDUCE RESOURCE IMPACTS OF EQUESTRIAN USE

Sample Statement: Horseback riding can create many environmental problems, such as increased erosion, stream contamination from their waste, and spread of hair. Allowing equestrian access to all areas of ANF could create unchecked environmental damage. Alternative D seems like the best alternative because it limits riding to specific areas of the forest which I assume were chosen because the impacts to the natural environment would be minimized there. (#431)

TO REDUCE RESOURCE IMPACTS OF ATV USE

Sample Statement: We support the reduction in allocation of acreage to ATV/OHM Intensive Use Areas (IUA) proposed in Alternative D of 40,519 acres...ATV/OHM use has a very high potential for serious resource damage through soil compaction, rutting, puddling, noise and severe waterway disruption. Limiting ATV/OHM use to relatively compact areas that can be patrolled and maintained is the only way to provide for this use without creating the potential for widespread resource damage. (#329)

Response: These opinions are noted. Alternative Cm was chosen since it best addressed the purpose and need for Plan Revision. See Decision and Rationale in the ROD for choosing Alternative Cm (pp. 15-30) and for short comings of this Alternative identified under the section Why not Alternative D (pp. 31 and 32). More specific elements are addressed below:

TO INCREASE WILDERNESS AND REMOTE RECREATION AREAS – See additional information on wilderness in response to PIs #299, 302 and 304. See additional information on remote recreation areas in response to PI #315.

TO INCREASE LATE SUCCESSIONAL AND STRUCTURALLY COMPLEX HABITAT – See additional information on late successional and structurally complex habitat in response to PIs #222, 223 and 225.

TO BALANCE ECOLOGICAL FUNCTION AND ECONOMIC USES – See additional information on balancing ecological function and economic uses in response to PIs #147, 148 and 150.

TO EMPHASIZE UNEVEN AGED MANAGEMENT – See additional information on uneven-aged management in response to PIs #147, 148 and 139.

TO REDUCE RESOURCE IMPACTS OF EQUESTRIAN USE – See additional information on resource impacts of equestrian use in response to PI #355.

TO REDUCE RESOURCE IMPACTS OF ATV USE – See additional information on resource impacts of ATV use in response to PIs #359, 362, 363, 364 and 365.

3.2.6 Alternatives Submitted by the Public

Public Interest #58: The Allegheny National Forest should choose Alternative D modified to include the proposals outlined in A Citizens' Wilderness Proposal.

Sample Statement: Though I strongly favor Alternative D over all others in the DEIS, I would also urge the Forest Service to reconsider the complete list of eight potential Wilderness Study Areas proposed in A Citizens' Wilderness Proposal for Pennsylvania's Allegheny National Forest throughout the remainder of the Forest Plan revision process. I and my wife have personally visited all these areas, and they clearly possess the attributes that qualify them for WSA adoption. They would also help to relieve the tremendous pressures on the ANF for non motorized dispersed recreation by potentially increasing the ANF land allocated to wilderness to the level found broadly in other eastern forests. (#1)

Sample Statement: Alternative D of the draft Environmental Impact Statement is a good first step recommending four areas for wilderness, Chestnut Ridge, Tracy Ridge, Allegheny Front and Minister Valley. Each of these areas has outstanding natural features, opportunities for solitude and primitive recreation among other wilderness values, and should be recommended as wilderness in the final plan. All eight areas identified in the Citizens' Wilderness Proposal for Pennsylvania's National Forest should be recommended as wilderness, however. (#376)

TO PROTECT BIRD SPECIES

Sample Statement: I just want to share some information on the bird life of the Allegheny National Forest. Throughout the year, there are over 300 species of birds found in the Allegheny National Forest, including 37 species of warbler, 16 raptors, seven owls, 31 species of waterfowl, numerous sparrows, oriole, chickadee, wading birds, blackbirds, eagles and others. Many of these species which are found commonly in the Allegheny are found only rarely in other areas...They are birds people will come to see, but only if there

habitat is protected. I support plan Alternative D with the addition of Citizen's Wilderness Proposal to provide for long term security of these bird species. (#405)

Response: These opinions are noted. See the Decision and Rationale section in the ROD for choosing Alternative Cm (pp. 15-31 and specifically pp. 17-20 for a discussion of wilderness) and for short comings of this Alternative identified under the section Why Not Alternative D (pp. 31 and 32). Also, see FEIS, Chapter 2, section 2.5.1, Alternatives considered, but eliminated from further study (pp. 2-27 and 2-28) for the rationale on why “A Citizen’s Wilderness Proposal” was not analyzed in an Alternative. Also, see Appendix C Roadless Area Inventory/Wilderness Evaluation.

Designation of Wilderness Study Areas is not the only method by which the ANF provides habitat for birds and other wildlife. For more information on birds and species viability analysis see PIs #268, 269, 270, 271, 272 and 265.

See response to PI #304 for a summary of the consideration and allocation of each of the areas recommended for wilderness in “A Citizen’s Wilderness Proposal.”

Public Interest #59: The Allegheny National Forest should consider and offer the Sierra Club proposal as a valid Alternative.

Sample Statement: The existing range of alternatives is inadequate. All Forest Service alternatives include large amounts of commercial logging, inadequate habitat protection for threatened and endangered species and other species with viability concerns, inadequate designations of new wilderness study areas, and no curbs on uncontrolled oil and gas development. [We] oppose commercial logging on all federal public lands, including national forest system lands. We request that a Supplemental Draft Environmental Impact Statement (SDEIS) and new PLRMP be prepared based on new analyses which addresses the concerns and issues that we raise in this letter. The product of these new analyses should be fully developed into an “Alternative E.” (#329)

Response: This opinion is noted. This request is very similar to the Allegheny Wild! Proposal, in which one of many resolutions was to stop commercial logging on the ANF. The Allegheny Defense Project’s Allegheny Wild! Alternative was considered, but eliminated from further study. See FEIS, Chapter 2, section 2.5.1 for an explanation (pp. 2-14 to 2-26). This request duplicates aspects already considered, so no new Alternative was created in the FEIS. Items that addressed no commercial logging include the minimum benchmark analysis (which reflects no vegetation management). This was used in the Species Viability Analysis; see FEIS, Appendix E.

Public Interest #60: The Allegheny National Forest should consider and offer Allegheny Wild! as a valid Alternative.

TO SERVE AS A BASELINE FOR CONSIDERING OTHER ALTERNATIVES

Sample Statement: The Forest Service must reconsider its decision to eliminate Allegheny Wild! as an alternative for the public to consider. The Forest Service acknowledged that many of the issues raised in Allegheny Wild! are addressed in the revised Forest Plan, but because of two issues - ending commercial logging and oil and gas drilling - they would not consider it any further. This is wrong because Allegheny Wild! serves as a baseline from which all other alternatives could be weighed. (#295)

TO PROVIDE FOR WILDERNESS, RECREATION, RESTORATION AND WILDLIFE HABITAT

Sample Statement: None of the four alternatives described in the revision documents adequately provide sufficient emphasis on low impact recreation, wilderness watershed protection and wildlife habitat, so I would

like to state my support for an alternative alternative, Allegheny Wild! This alternative does provide for the forest uses and values that the American public increasingly demands. This alternative provides increased wilderness, special recreation areas, forest and watershed restoration, watershed protection and habitat. (#365)

Sample Statement: [We] have proposed a restoration program in...Allegheny Wild! to hire local citizens to do restoration work in the Allegheny National Forest...Adopt [our] proposed restoration program as part of the EIS. (#295)

FOR SPECIAL AREA DESIGNATIONS

Sample Statement: The Forest Service should adopt proposals for Natural Areas, Scenic Areas, Research Areas, Forest Recreation Areas, and Historic Areas recommended by the Allegheny Defense Project as well as special area designations for other locations worthy of such. (#295)

FOR THE ALLEGHENY WILD! OLD GROWTH MANAGEMENT PLAN

Sample Statement: The Draft Plan Ignores Old Growth/Wildlife Connectivity: The Forest Service has failed to adopt an old growth management plan for the Allegheny National Forest despite its own studies suggesting it is necessary. The FS needs to support the Allegheny Defense Project's Old Growth management plan for connectivity between Wilderness and other protected habitats for wildlife. (#295)

TO BENEFIT THE LOCAL ECONOMY

Sample Statement: The Allegheny Wild! Plan proposes over 200 miles of new hiking, bicycle, cross-country ski and horse trails. And, the restoration and conservation work needed in The Allegheny will provide jobs for local economies. For a recent example of this economic effect, look at the economic benefits created by tourists cycling the Great Allegheny Passage bike trail. A strong commitment to recreational opportunities and scenic management will bring more people - and more money - to the economies surrounding the Allegheny. (#195)

Response: The ANF considered the Allegheny Wild proposal, but did not develop it as an Alternative developed in detail. The reasons why this was not considered in detail is described in the FEIS Chapter 2, section 2.5.1 (pp. 2-14 to 2-26). In brief, the proposal would like to see commercial logging and oil and gas development ended on the ANF and management redirected to restore the forest to “natural” (i.e. pre European settlement) conditions. Many of the issues raised in the proposal are addressed in the LRMP either through revised standards and guidelines or in the range of Alternatives. Some of the issues raised (e.g. ending commercial timber harvest) did not address the purpose and need of the revision, were outside the scope of the LRMP or infeasible (e.g. phasing out private oil and gas development).

3.3 Air and Water Quality

3.3.1 Air Quality

Public Interest #61: The Final EIS should describe how air quality will be defined and measured, and detail how deficiencies will be managed.

Sample Statement: How will air quality levels be defined, detected, and/or measured? What will the response be if the standards are exceeded? (#95)

Response: Air quality levels are defined by the EPA's National Ambient Air Quality Standards (NAAQS) which are given for each pollutant in the FEIS, Air Quality section, Affected Environment (pp. 3-52 to 3-55). The criteria pollutants are detected and measured on a regional scale by State and Federal Agencies. If regional standards are exceeded, State and Federal Agencies will determine the needed changes in the regional emissions. The ANF will comply with the direction set forth by these agencies.

Public Interest #62: The Final EIS should analyze the impacts of air pollution, acid deposition and ground-level ozone and develop plan standards and guidelines to address regional air quality.

Sample Statement: The ANF's Forest Plan Revision must incorporate air quality standards and guidelines into its management plan that will address the impacts of air pollution such as acid deposition and ground-level ozone, which are seriously affecting the health of Pennsylvania's forests and its citizens. If poor air quality is harming our forests, it is harming our citizens...The FS must develop Plan standards and guidelines requiring the FS to review and comment on ANF region air quality permits (#295)

Response: The ANF addressed effects of air pollution in the following sections: FEIS 3.2.4 Air Resources section, FEIS 3.2.2 Soil Resource - Affected Environment - Soil Nutrients and Cumulative Effects - Soil Nutrients sections, as well as FEIS 3.3.1 Forest Vegetation - Affected Environment - Forest Health - Ozone, Site/Species Nutrient Capacity, and Atmospheric Deposition and Cumulative Effects - Forest Health sections.

A 2500 Watershed and Air LRMP goal states: "Cooperate with regulatory agencies to reduce adverse effects of air pollution and atmospheric deposition on forest ecosystems." (LRMP p. 14) The LRMP does not preclude the ANF from reviewing and commenting on region air quality permits.

3.3.2 Water Quality

Water Quality Regulations

Public Interest #63: The Allegheny National Forest should adopt PA DEP water quality standards.

Sample Statement: We suggest that the following standard be adopted to protect existing uses. "Support the most protective water use designation merited by the biological and chemical characteristics of a stream basin as defined by Pennsylvania Department of Environmental Protection 25 Pa. Code, Chapter 93, Water Quality Standards Regulations." Such a standard will allow Allegheny National Forest staff to best support the most protective water quality designation. (#63)

Response: The ANF has adopted this as a standard under All Water Resources (LRMP p. 74).

Public Interest #64: The Forest Plan should provide for compliance with the Clean Water Act and Clean Streams Law of Pennsylvania.

Sample Statement: The Clean Water Act / Clean Streams Law of Pennsylvania requirements are not being adhered to on the ANF nor does the Draft Plan demonstrate a commitment to enforce those federal and state laws on the ANF with specific standards and guidelines to protect watersheds. (#295)

Response: A new standard has been added to the LRMP in 2500 Watershed and Air Management: All Water Resources. It states: "The appropriate State or Federal permits will be acquired for the discharge of dredged or fill material into a waterway, its 100-yr floodplain, or any lake, pond, reservoir, or wetlands following Commonwealth Regulations and Section 404 of the Clean Water Act." In addition, the ANF will implement LRMP Design Criteria on all projects which are consistent with the PA DCNR Forest Management Plan and PA DEP Best Management Practices. These design criteria, which control erosion and sedimentation and minimize

development in riparian corridors, will be followed to be in compliance with the Federal Clean Water Act and the Commonwealth's Clean Streams Law.

The first standard listed under the 2800 Minerals and Geology section of the LRMP states that OGM development must comply with Commonwealth and Federal Law. OGM development will also be evaluated against the design criteria in the LRMP for all resources.

Watersheds

Public Interest #65: The Final EIS should include an assessment of Allegheny National Forest watersheds.

Sample Statement: The FS Draft Plan fails to properly assess ANF watersheds to prevent damage to water resources. (#295)

Response: The goals, objectives, and design criteria in the LRMP provide for the protection of watersheds. Specifically, the design criteria in 2500 Watershed and Air Management provide for the protection of water resources and water quality. The ANF provided a summary of land ownership in watersheds, as well as timber harvest suitability in the following sections: FEIS 3.2.3 Water Resources – Affected Environment and Direct and Indirect Effects. Since the ANF proclamation boundary is within 15 watersheds ranging in size from 77 to 258 square miles it is easier to complete watershed assessments at the project level. At the project level, watersheds can be evaluated for the current condition of water resources and the effects from activities.

Public Interest #66: The Forest Plan should include mandatory provisions to protect watersheds.

Sample Statement: Watershed protections within the Forest Plan are given low priority, are often optional, and in some cases, have been blatantly weakened to prevent their enforceability. For example, the requirement that oil and gas exploration companies comply with water protection requirements of the Forest Plan is an optional 'guideline.' In the past, Forest Plan "guidelines" that protected spring seeps and riparian areas were mandatory requirement. (#291)

DESIGNATE MANAGEMENT AREAS

Sample Statement: The Forest Plan Must Have Management Area Re-Zoning That Properly Reflects The Original Intent Of Allegheny Establishment For Watershed Protection - Not Commercial Extraction. (#295)

Response: Watershed protection is provided across all ANF lands through Plan Goals, Objectives, and Design Criteria in the LRMP, 2500 Watershed and Air Management. As a result, there are no specific MAs titled 'Watershed Protection'. The design criteria provide direction for avoiding and minimizing impacts to watershed resources. In addition, see PI #98 for discussion on water protection requirements for OGM development and PI #251 for discussion on protection of seeps and riparian areas. See PI #1 for discussion on the role of standards and guidelines in the LRMP.

Public Interest #67: The Allegheny National Forest should prohibit all management activities that impact watersheds.

Sample Statement: Past and present industrial logging and oil and gas activities demonstrate that the FS is not adequately protecting water resources on the ANF. No activities should be occurring that are damaging watersheds. (#295)

Response: It is not within the scope of MUSYA, NFMA and other laws providing direction to the Forest Service to halt all activities that impact watersheds. Impacts are predicted to occur in the course of pursuing multiple use objectives. However, the LRMP provides standards and guidelines to mitigate those impacts (see response to PI #66). Since LRMP standards and guidelines will meet or exceed the PA Department of Environmental

Protection's Best Management Practices, they will meet the goals of the Clean Water Act to protect water quality from non-point source pollution.

Public Interest #68: The Forest Plan should emphasize wilderness areas, remote recreation areas and roadless areas to protect watersheds.

Sample Statement: Wilderness Areas and Remote Recreation Areas are good...You have such a limited opportunity with the tremendous number of gas and oil roads. Roadless areas encourage recovery. The roads superimpose a "new", added drainage system. They increase flow peaks, and this gives you an added limitation as to what you can do on your watersheds to begin to reverse the destabilization of your stream channels and their ability to carry water. (#20)

Response: The ANF has emphasized wilderness and remote recreation areas in the Alternatives. We have also selected additional wilderness study areas in Alternative Cm (Minister Valley and Chestnut Ridge as Wilderness Study Areas) and provided a new designation, remote recreation area (MA 7.2), for Clarion River, Hickory Creek Addition and the Hearts Content Area. In the new MA 7.2 designation, we emphasize the area as predominantly without roads. MA 2.2 also does not generally allow construction of new roads. We also provide an objective to decommission roads in these areas where possible (see MA 7.2 design criteria in the LRMP on p. 137). See PI #66 for a discussion on how the design criteria in the LRMP protect watersheds.

3.4 Soils

3.4.1 Soil Classification

Public Interest #69: The Allegheny National Forest should use LTA, ELT and/or ELTp soil classifications for project planning.

Sample Statement: I started the Soil Group I, II, and III system it was ok in 1986, but now there is a better system that looks at the total landtype and not just soils and provides an appropriate scale for projects of different scales and intensities. Depending on scale and management or project work LTA's, ELT's and/or ELTp's should be used rather than individual soil types. ELT's and ELTp's provide landtype descriptions, soil descriptions, plant information, and information on resistance, resilience, and amplitude of the landtype. The grouping of similar items provides a frame work for organizing knowledge about ecosystems and landscapes. This grouping can include biological elements and variables (e.g., species distribution, species richness, plant community structure, habitat area and shape) and physical features and processes (e.g., soil type, precipitation, topography), or some combination of biotic and biotic features. (#214)

Response: Clarion University, Pennsylvania State University and others have been partners with the ANF over 10 years in developing the Ecological Classification System. In 2005, a final delineation of LTAs and ELTs for the ANF was completed and used in the planning process as part of the Ecological Context (available on the ANF website). We have not advanced to the point where we can prescribe management actions and apply standards and guidelines by ecological units. The relationships between management actions and ecological units need more research and field testing but we look forward to working with our partners to further refining the use ecological units on the ANF. The ANF does use LTA and ELT classifications for project level analysis.

3.4.2 Mitigation of Impacts

Public Interest #70: The Forest Plan should emphasize methods of timber extraction that have minimal ground disturbance.

Sample Statement: When it comes to resource extraction, we should be able to have logging on the forest, but it should rely on either horse teams or track machines using logging arches for lesser land impact. Wheeled skidders should be prohibited. (#408)

Sample Statement: I feel that all the other areas [besides MA 6.3 and MA 8.1] could be harvested using helicopter logging or some other form of harvesting that would minimize ground disturbance. (#277)

Response: The type of harvesting equipment used during salvage and other types of harvesting would be determined when future projects are proposed and developed, and is influenced by a number of factors, in particular soil disturbance. Decisions of this nature are made at the project level and based on known site-specific conditions and the forestwide and management area standards and guidelines, particularly those in the 2400 and 2500 sections (LRMP, Parts 3 and 4). While some equipment may cause some ground disturbance, regional direction limits detrimental ground disturbance for Forest Service activities. See FSH 2509.18 – Soil Management and see the standards and guidelines in the Part 3, 2500 Watershed and Air Management, Soils section of the LRMP. In addition, see response to PI #73.

Public Interest #71: The Forest Plan should retain seasonal logging restrictions on poorly or moderately drained soils and require the use of low ground pressure skidding equipment.

Sample Statement: The Forest Service said in the 1986 Forest Plan: “On 'poorly' and 'moderately' drained soils, seasonal logging restrictions and/or low ground pressure skidding equipment will be utilized.” This requirement is gone in the PLRMP. The only aspect of this once mandatory requirement in the PLRMP is where the Forest Service states: “seasonal restrictions on vegetation management activities may be imposed to protect or manage featured plant or animal species, to provide recreational opportunities, or to protect soil and water resources.” This means that the Forest Service no longer has to restrict itself to seasonal logging and/or utilizing low ground pressure skidding equipment to log on poorly and moderately drained soils...The section on watershed and air management does not cover this either because that section simply says: “equipment operation will only occur when soils are capable of supporting equipment without incurring detrimental compaction, puddling, or rutting in excess of regional standards.” That is clearly not the same as placing seasonal restrictions for logging on sensitive soils. (#327)

Response: Between draft and final LRMP, an additional guideline was added in section 2500 Watershed giving more protection to sensitive soils. These soils are protected by the guidelines in the LRMP as well as by regional direction - FSH 2509.18 – Soil Management. The current protection not only allows for seasonal logging restrictions to be used but also limits logging on these soils during unexpected wet periods that may occur outside of the restrictions. By saying “equipment operation will only occur when soils are capable of supporting equipment without incurring detrimental compaction, puddling, or rutting in excess of regional standards” the soils must be considered year round as a potential restriction to equipment operation.

See also FSH 2509.18 – Soil Management discussion in the response to PI #73. See response to PI #1 for discussion on the role of standards and guidelines in the LRMP.

Public Interest #72: The Allegheny National Forest should use more rigorous standards and best management practices when harvesting on steep slopes.

Sample Statement: Another important consideration is the suitability of timber harvests on slopes up to 40 percent. This is a concern where steep slopes drop directly to streams and where large areas of disturbance exist above these slopes. Oil and gas development, roads and large areas of disturbance exist above these

slopes. Oil and gas development, roads and large timber harvests are examples of activities that may challenge the integrity of even well forested steep slopes. Harvests on slopes exceeding 25% should be subject to more rigorous standards and (best) management practices. (#95)

Sample Statement: Steep slopes present multiple safety and resource protection problems for logging operations. This Guideline should be re-written as a Standard with no exception for salvage logging. (#329)

Response: The steep slopes guideline has been rewritten to limit salvage logging to full suspension or winching. See LRMP, Part 3, 2400 Vegetation Management, Steep Slopes section and Part 3, 2500 Watershed and Air Management, Soils section.

Steep slopes greater than 40% are considered unsuitable for timber harvest across the ANF. While harvest on slopes 25 to 40% can be considered depending on site characteristics, best management practices and mitigation measures are determined at the project level according to management objectives and LRMP design criteria. Harvesting on steep slopes is mainly a concern due to soil disturbance and the increased propensity for exposed soil to move downhill, either as mass movement (such as landslides) or as stream sediment. We have a number of mitigation measures that we can apply to timber harvesting at the project level to reduce the potential for soil disturbance and movement, including not allowing heavy equipment on steep soils, limiting road construction and the use of skid trails, using helicopters to yard logs and changing silvicultural prescriptions to leave more trees.

Public Interest #73: The Forest Plan should make guidelines to protect soils from erosion and compaction mandatory.

Sample Statement: Forest Plan requirements to protect soil erosion and compaction have been either removed from the management plan, or made into optional guidelines. (#295)

Response: Soils on the ANF are provided protection in both the LRMP and regional direction, FSH 2509.18 – Soil Management. The LRMP provides soils protection by limiting the use of sensitive soils and requiring erosion control measures (pp. 72-74). FSH 2509.18 – Soil Management addresses detrimental soil disturbance: compaction, displacement, puddling/rutting, burned, eroded and mass movement. The combination of these conditions is limited to 15% of the activity area. Rutting is limited to 5% of the activity area included in the 15% disturbance. Activity areas are areas of potential soil disturbance that will be expected to produce biomass in the future (i.e. timber harvest units, log landings, prescribed burn areas and the corridors of temporary and skid roads). Activity areas will be smaller in extent than project areas.

Each of these conditions is defined by regional standards (FSH 2509.18 – Soil Management) as shown below:

- Detrimental compaction is defined as a 15% relative increase in bulk density.
- Detrimental displacement is a loss of 25% of the uppermost mineral horizon.
- Detrimental puddling is the alteration of soil structure severe enough to reduce the permeability and infiltration rate of the soil by foot, hoof, or vehicular traffic.
- Detrimental rutting is a severe form of puddling with ruts 6 inches deep and 10 feet long.
- Detrimentally burned soils result from high intensity fires and are identified by: Reddish color; fine roots/organic matter charred in upper 25 percent of the organic matter rich mineral soil surface layer (not to exceed one inch) and, in poorly developed soils that lack such a mineral surface soil, oxidation of organic surface layer (O horizon); hydrophobic conditions.
- Detrimentally eroded soils are determined by the presence of rills, gullies, and pedestals.

- Detrimental mass movement includes slumps, debris flows, and landslides.

Soil disturbance is monitored according to the LMRP monitoring plan (p. 56) to assure that these limits are not exceeded.

See response to PI #1 for discussion on the role of standards and guidelines in the LRMP.

3.5 Oil, Gas and Minerals

3.5.1 Regulations

Federal Regulations

Public Interest #74: The Allegheny National Forest (should or should not) recognize that it has greater authority to place restrictions on surface occupancy associated with private OGM development.

Sample Statement: The Forest Service has regulatory power granted by Congress. As for the Forest Service's power to regulate, we understand that the Forest Service has historically granted permission for owners to access their mineral rights by pursuing a cooperative approach, guided by the 1980 Minard Run decision. We note, however, that the Minard Run case was decided purely under Pennsylvania property law dealing with the easements that occur when the surface of the land is separated from the mineral estate beneath it. The United States was granted no greater rights than any other landowner in that case, but only because the United States “specifically disclaimed any intention of proceeding as a sovereign in regulating the use of the surface.” Therefore, the Minard Run decision does not present the full range of the Forest Service's regulatory power over oil and gas development. Not only does the Forest Service have rights under Pennsylvania law as a surface owner to ensure that access to mineral rights is restricted to the reasonable use essential to remove the minerals (see below), but the Forest Service has been granted authority by Congress to regulate surface occupancy under federal regulations. We believe this power is complementary to Forest Service rights as a surface owner and, while it may not allow the Forest Service to deny the owners access to their mineral rights, it does allow the Forest Service, under its regulations, to place reasonable restrictions on surface occupancy. In other words, while a cooperative or collaborative approach to managing private oil and gas development is certainly preferable, under federal law, the Forest Service has coercive power to require mineral owners to follow its regulations...This is illustrated by the Duncan Energy cases from North Dakota related to private oil and gas development in the Custer National Forest. Although Duncan Energy is not controlling law in Pennsylvania, we believe it, rather than Minard Run, illustrates the full range of Forest Service power over oil and gas development which comes from both state property law and federal law. We believe these two complementary sources of power allow the Forest Service to determine the reasonable use of National Forest surface land and to insist that the oil and gas development cause as little impact as possible on the surface resources of the Allegheny National Forest. (#327)

Sample Statement: By extension of Pennsylvania law, a U.S. District Court in Minard Run required advance written notice, including five enumerated items, to afford the Forest Service an opportunity to timely react by making arrangements for timber removal and/or proposing acceptable alternative locations. However, the requirement that an OGM Holder act reasonably by using a less burdensome alternative location is the extent of an OGM Holder's legal obligation to accommodate a surface owner such as the Forest Service. There is not additional requirement to affirmatively undertake mitigation measures as set forth in the proposed Plan, and the Forest Service has no legal right as surface owner to unilaterally designate “management areas” that result in burdensome requirements. To the extent that the Plan will require such measures, it constitutes an unlawful use of regulatory authority and an impermissible Taking of private property without just compensation. (#470)

Sample Statement: Private lease road construction, maintenance and reconstruction must satisfy Best Management Practices (BMP) required by the Pennsylvania Department of Environmental Protection (DEP) to minimize soil erosion and sedimentation, thereby protecting surface waters and their existing uses. The DEP-required BMPs may not strictly adhere to the Plan's standards and guideline for Forest roads, but they are nevertheless adequate to protect water quality and aquatic habitat so long as the BMPs are properly implemented. (Footnote: DEP-required BMPs for oil and gas lease roads and well pads appear to be meeting their intended environmental purposes. As noted in the DEIS, “currently there are no streams listed on the 303(d) list by DEP for sediment delivery from National Forest or OGM activities.” (see Page 3-42)). (#324)

Sample Statement: Forest-Wide Design Criteria, 2800 Minerals and Geology Private Minerals. We have concerns with the unduly permissive language of this section. We believe that the Forest Service's duty to protect the ANF mandates strong language that emphasizes (1) that the Forest Service will uphold its rights as a surface owner and that disturbance of the federal surface will only be permitted to the extent that it is necessary, and (2) that the Forest Service has authority to regulate use and occupancy which includes the authority to determine the reasonable use of the federal surface. For example, the discussion states: “The degree of adherence to the following standards and guidelines, with respect to the exercise of private mineral rights, will vary as those relative rights vary.” However, this is only true of reserved mineral rights which are governed by deed provision and which may therefore vary based on what regulations were in force at the time and incorporated in the deed. Outstanding mineral rights, on the other hand, are not governed by varying deeds and therefore the relative rights of the owners and the Forest Service will not vary. Similarly, the “standards” ought to be strictly mandatory. (#327)

Response: The ROD (p. 29) states that the “design criteria sets forth a rebuttable presumption for operational standards that protect publicly-owned surface resources from unreasonable interference due to oil and gas development while allowing access necessary for such development.” This approach led to several modifications from the PLRMP to the final LRMP. This included the deletion of the draft introductory section referenced by the fourth respondent. The first standard of the 2800 Minerals and Geology design criteria (LRMP p. 90) clearly speaks to the requirement that “land management decisions must not preclude the ability of private mineral owners to make reasonable use of the surface.” It also makes clear that “reasonable surface use for the development and operation of subsurface rights will be evaluated based on the design criteria and other direction of this plan.” The ROD (p. 30) further acknowledges “there will be times where law, regulation, ownership rights and physical circumstances may, together or individually, require the application of design criteria different from those set forth in the revised Forest Plan. However, these situations should be viewed as the exception rather than the rule.”

Public Interest #75: The Forest Plan should revise desired condition and goal statements with respect to OGM development.

Sample Statement: It is not as easy...to understand how the Forest Service, despite all of the evidence about the impacts of oil and gas drilling on soil and other resources, still says: “the ANF will cooperate in the development of these subsurface rights consistent with maintaining appropriate conservation of ANF surface resources.” These statements are not reconcilable. The Forest Service is clearly not “maintaining appropriate conservation of ANF surface resources” in the way it currently “cooperates” with oil and gas companies drilling in the Allegheny. (#327)

Sample Statement: The proposed Plan includes two goal statements for 2800 Minerals and Geology: Help meet local and national energy resource needs by considering opportunities for energy development and the supporting infrastructure on the ANF. Reasonably protect surface values and mitigate impacts caused by oil, gas and mineral (OGM) operations by working cooperatively with OGM operators and Commonwealth and federal regulatory agencies. In light of the ANF's unique position of being jointly owned and managed by the USFS and private mineral owners, we suggest that the first goal statement be revised to read: Help meet local and national energy resource needs by considering opportunities for energy development and the supporting

infrastructure on the ANF and by encouraging the private oil and gas industry to develop the oil and gas resources beneath ANF lands using innovative techniques to minimize surface resource disturbance. The additional language is adapted from a similar statement made by the USFS in its 1984 Handbook for Oil and Gas Administration for the Allegheny National Forest. (#324)

Sample Statement: The Plan is contrary to national Forest Service policy. As set forth in the Plan, the Goals for Minerals and Geology include “Help meet local and national energy resource needs by considering opportunities for energy development and supporting infrastructure on the ANF.” This draft Goal is contrary to current Forest Service policy on the national level. To the contrary, the Forest Service Manual states that the policy of the Forest Service is to promote mineral and energy development, not merely to “consider opportunities” for the same. Specifically, the Forest Service Manual states the mission of the Forest Service as follows: The availability of mineral and energy resources within the National Forests and Grasslands significantly affects the development, economic growth and defense of the Nation. The mission of the Forest Service in minerals management is to encourage, facilitate, and administer the orderly exploration, development, and production of mineral and energy resources on national Forest System lands to help meet the present and future needs of the Nation. To effectuate the above-stated mission, the primary objective set forth in Section 28902 (Objectives) of the FSM is to “Encourage and facilitate the orderly exploration, development, and production of mineral and energy resources on National Forest System lands to maintain a viable, healthy minerals industry.” In addition, with respect to private mineral rights specifically, Forest Service policy is to “ensure that private mineral rights are protected when resource management decisions are made that affect National Forest Lands.” (#470)

Response: Minerals development is one of the established uses of national forests and owners of private mineral estates have a legal right to develop that estate. Recognizing this, the desired condition and the goal statement of the LRMP (LRMP pp. 10 and 15) encourage cooperation for orderly development of mineral resources. We have adjusted this goal statement based on the cited Forest Service Manual direction.

The LRMP balances these rights for private development of subsurface resources by clearly stating its intention that “surface development ...causes the least amount of impact” and that restoration occurs after use is finished (LRMP p. 10). The Goal (LRMP p. 15) also emphasizes cooperation with partners to protect surface values and mitigate impacts of OGM development.

Public Interest #76: The Allegheny National Forest should require bidding on OGM road construction timber sales.

Sample Statement: Oil and Gas Companies are the largest timber purchasers on the ANF and pay the least amount of money at the expense of the taxpayers. A new forest plan must end this secret, no bid timber sale program, which costs the taxpayers millions of dollars each year. The Forest Service is allowing oil and gas companies to build roads on the ANF without an Environmental Assessment in violation of federal law. The Draft Plan ignores this illegal road building. (#295)

Response: Oil and gas companies are not the largest timber purchasers on the ANF. In FY 2006 (October 1, 2005 – September 30, 2006), the ANF sold a total of 28,923 MBF of timber, of which 23,237 MBF (80.3%) was sold to timber purchasers through the competitive bid process and 5,687 MBF (19.7%) was sold to the oil and gas companies directly. The oil and gas companies paid an average of \$426.31/MBF for their timber and the timber purchasers averaged \$600.59/MBF for their timber. It is hard to compare the average price paid directly due to the many variables involved, such as species, size and volumes per acre. The oil and gas companies are charged the timber Settlement Price. The timber Settlement Price includes the anticipated bid premium that we would normally expect to receive on bids for sales offered to purchasers. Thus, the timber that is sold to oil and gas companies is not sold at a special discount compared to that sold to timber purchasers. Information on the price and method by which ANF timber is sold to both oil and gas companies and timber purchasers is publicly available. In addition, see response to PI #77.

Public Interest #77: The Allegheny National Forest should comply with NEPA requirements while regulating OGM development.

Sample Statement: We understand that Forest Service approval of private oil and gas development is a function of both the Forest Service's rights as a surface owner under Pennsylvania law and its authority under 36 C.F.R. section 251.50 to require those seeking to use National Forest lands to submit a proposal for such “special uses” and receive authorization. We believe that because the Forest Service has discretion to consider environmental impacts, has significant influence over the final outcome of the private project, and a duty to protect the National Forests, granting such “special use” authorization is a federal action that triggers NEPA applicability. (#327)

Sample Statement: Federal law grants the Forest Service clear authority to control surface disturbance by owners of subsurface rights. This authority has been upheld in multiple circuit court decisions. The refusal of the FS to follow National Environmental Policy ACT procedures in a new well development is also unacceptable to us. Under federal case law, the permission to develop OGM facilities granted by the Forest Supervisor is legally equivalent to the issuance of a permit by the Forest Service. As such, the FS has both stewardship and legal responsibility to follow standard NEPA procedures and, at a minimum, prepare an Environmental Assessment (EA) for each new development. (#329)

Response: This is a procedural comment and not a LRMP decision. All NEPA requirements for implementing the LRMP will be fulfilled.

Public Interest #78: The Forest Plan should include a standard or guideline that states it will not approve future federal mineral leases on the ANF.

Sample Statement: Forest-Wide Design Criteria, 2800 Minerals and Geology, Federal Minerals: The Acquired Lands Act of 1947 established a separate mineral leasing system for all minerals on acquired public lands. Under this system, “no mineral deposit covered by this section shall be leased except with the consent of the head of the executive department having jurisdiction over the lands containing such deposit and subject to such conditions as that official may prescribe to insure the adequate utilization of the lands for the primary purposes for which they have been acquired or administered.” Thus, although administered by the Department of Interior, the Forest Service may deny lease approval on acquired national forest lands, or prescribe conditions on such leases. Given the high level of private oil and gas development in the ANF and its extensive impacts throughout the forest, we would suggest a standard, or at minimum a guideline, that the Forest Service will not approve future federal mineral leases in the ANF. Procedurally, this may require a revision of the current leasing analysis (a suggested plan objective above). (#327)

Response: The LRMP (Standards and Guidelines 2800, Federal Mineral Leasing, p. 92) identifies four stipulations for federal leasing:

1. Withdrawn
2. Not available for leasing
3. Leasing with no surface occupancy
4. Leasing with limited surface occupancy

Under the LRMP, federal minerals located in Management Areas in the first or second stipulations will not be offered for leasing (MAs 5.1, 5.2, 8.1, 8.2, 8.3, 8.4 and 8.5). Management Areas in the first, second or third stipulations are identified in the Minerals and Geology section of each MA discussion in Part 4 of the LRMP.

See Appendix F, p. F-1, paragraph three, for a list of Federal minerals that have been withdrawn or are unavailable for leasing. See FEIS Chapter 3, pp. 3-6 and 3-7 for discussion of withdrawn minerals by Alternative.

Role of Standards and Guidelines

Public Interest #79: The Allegheny National Forest should clarify the role of standards and guidelines in regulating privately owned OGM development.

Sample Statement: Section 2800 of Part III is titled Minerals and Geology. It addresses federal and private mineral development on the Allegheny National Forest. Notwithstanding the introduction's reference to "principles," the paragraphs discussing private minerals prescribe standards and guidelines. Standards are described as something to be adhered to and guidelines are characterized as an ANF management expectation. At the same time the standards and guidelines are also described as providing the "primary basis of evaluation and negotiation between the ANF and Oil, Gas and Mineral operators." This language is confusing, particularly when the introductory comment about "principles" (suggesting that this is something other than or additional to a standard or guideline) is added to the mix. (#275)

Sample Statement: I am concerned about your standards and guidelines for private minerals. Many are similar to what is in the current Forest Plan, but with subtle differences in wording. For example, the word "should" is often used in the proposed standards and guidelines where the word "will" is used in the current ones. I assume this is significant and I hope it's not an attempt by the Forest Service to shirk its responsibilities to protect publicly owned surface property during private mineral development. I also question your statement that "The degree of adherence to the following standards and guidelines with respect to the exercise of private mineral rights will vary as those relative rights vary." That does not make sense to me and it appears you are setting the stage to abdicate your responsibilities to protect public property. Note that I own over 100 acres where someone else owns the subsurface and has drilled gas wells. So I am well aware of the challenges you face, albeit on a much, much larger scale. (#262)

Sample Statement: The following standards ("the operator must comply with the following") from the 1986 Plan do not appear and should be included: all abandoned wells will be plugged, according to state law - roads will be gated and will be used only for oil and gas production and FS administration - slash from clearing roads, well sites, and other areas will be kept out of the springs, seeps, and streams. Timber should not be skidded across streams. (#327)

Sample Statement: Forest-Wide Design Criteria, 2800 Minerals and Geology Guidelines. As for the proposed guidelines, we are concerned that the following are guidelines and not standards. They seem to us reasonable restrictions and limitations that ought to be mandatory in all circumstances: - copies of the Commonwealth approved drilling permits before surface disturbing activities occur; this was a requirement in the 1986 Plan. - clearings limited to the minimum size necessary - restoration, stabilization and removal of equipment of abandoned well sites - limiting the number of roads to the minimal amount needed. The following should also be guidelines: - clearings will avoid den and unique mast producing tree wherever possible - well sites and access roads should be placed in such a manner, given site topography and locations of springs and streams, to minimize sedimentation and other detrimental effects on surface resources. (#327)

Response: The response to PI #1 and pp. 1, 2 and 53 of the LRMP set forth the general principles of standards and guidelines. The introductory language that preceded the design criteria regarding private minerals in the PLRMP (page III-35) has been deleted, due to confusion over the applicability of standards and guidelines to private oil and gas. As the ROD (pp. 29-30) and the first standard of the LRMP in section 2800 Minerals and Geology (LRMP p. 90) indicate, all design criteria in the LRMP potentially apply to the consideration of oil and gas development, not just the material in section 2800. The section also makes clear that the ANF will evaluate OGM development proposals and operations for consistency with the design criteria.

As throughout the LRMP, the distinction between standards (which are clearly identified and use words such as “shall” or “will”) and guidelines (which are also identified and use words “should”) apply. Existing language in the 1986 Forest Plan that did not clearly distinguish between standards and guidelines have been clarified in the LRMP by including these distinctions. With respect to the specific direction elements mentioned by the respondents:

- Plugging and restoration of well sites (see response to PI #109).
- Standards (LRMP pp. 95-96) describe general road status and gating. Closure of gates related to OGM operations is a guideline (LRMP p. 92).
- Guidelines (LRMP p. 74) address keeping materials out of streams.
- Guidelines (LRMP p. 75) prohibit skidding across streams.
- Standards (LRMP p. 91) require Commonwealth drilling permits.
- Guidelines (LRMP p. 91) direct minimizing clearing size for OGM developments.
- Standards (LRMP p. 91) address restoration, stabilization of OGM sites and prohibit long term storage of equipment.
- Guidelines (LRMP p. 80) address retention of den trees.
- Guidelines (LRMP pp. 75 and 78) address avoiding oil and gas developments within riparian corridors and wetland management zones.

State Regulations

Public Interest #80: The Allegheny National Forest should utilize the 1984 Pennsylvania Oil and Gas Act to regulate OGM development.

Sample Statement: Develop specific standards and guidelines for the FS to comment on, object to, and appeal newly proposed wells using the authority under the 1984 Pennsylvania Oil and Gas Act. Require publicly reviewed plans from oil and gas developers applying for permits in ANF watersheds, post permits on the ANF website, hold public hearings if requested with a public comment period before approving plans. These are public assets. The Pennsylvania Oil and Gas Act of 1984 grants the FS as the surface land owner of the Allegheny, the power to “consider, object to and appeal to” the PA DEP the location and impacts of proposed wells on “public resources to include, publicly owned parks, forests, gamelands, wildlife areas and habitats of rare and endangered flora and fauna and other critical communities.” (#295)

Response: As stated in the first standard for 2800 Minerals and Geology (LRMP p. 90), “Reasonable surface use for the development and operation of subsurface rights will be evaluated based on the design criteria and other direction of the plan.” This evaluation would form the basis for subsequent federal consideration of OGM activities. The ANF follows the required procedures for processing OGM development.

Public Interest #81: The Forest Plan should require OGM operators using OHVs and snowmobiles to comply with Pennsylvania Department of Conservation and Natural Resources guidelines.

Sample Statement: Vehicles used on the Forest for well service, etc. shall be subject to approval and review by the Forest Service. All PA DCNR guidelines for OHV use shall be required. In the event snowmobiles are used, the same guidelines shall be applied. (#293)

Response: See LRMP Part 3, Design Criteria, section 2800 Minerals and Geology, Standards, p. 91 regarding use of ATVs/OHMs by OGM operators.

Surface Minerals

Public Interest #82: The Allegheny National Forest should acknowledge common ownership of stone and gravel and that OGM pit development is a private action and is not subject to Forest Plan standards and guidelines.

Sample Statement: Similarly, the creation, development or expansion of rock or borrow pits for road construction materials are private actions associated with the express or implied right of passage that is part of the mineral estate. This right, which is contained in long-standing principles of Pennsylvania property law, has been recognized by the USFS for more than 20 years in practice, in the 1986 forest plan, and in policies and guidelines associated with the development of private mineral estates within the ANF boundaries. (Footnote: See for example, the Mineral Materials (stone and gravel) section of the 1986 ANF Plan and the discussion of rock pits and borrow areas in the 1984 handbook for Oil and Gas Administration of the Allegheny National Forest, Chapter 6 (Engineering), page 4, and Exhibit 8 (Pit Plan and Specs) Nevertheless, the DEIS asserts in the case of rock or borrow pits that “unless specifically mentioned in the mineral deed, common variety minerals belong to the surface estate.” (#324)

Sample Statement: The foregoing statement improperly curtails the mineral owner's right to use surface materials such as stone and gravel that would be extracted from a rock or borrow pit located on the ANF surface above the mineral estate when use of the materials is incident to the mineral owner's ability to develop and produce oil and gas. Through the DEIS statement, the USFS also would imply that any decision regarding the creation, development or expansion of rock or borrow pits for the exercise of the private mineral owner's right of passage to gain access to the mineral estate is a Federal action. This is a mistake, at best. Like activities associated with OGM lease roads, activities associated with the opening, expansion, maintenance and use of rock and borrow pits for lease road construction are private actions undertaken within legal rights of the mineral owner that have long been acknowledged by the USFS. Those private actions would be governed by the Plan's standards and guidelines insofar as compliance with the standards and guidelines is necessary to accommodate the interests of the surface estate without harming the OGM owner or lessee's ability to extract the resource. Any statements with the DEIS or proposed Plan that would imply the alteration of the well-established legal relationship between the ANF surface owner and the owner of private mineral estates beneath the ANF lands must be removed. The USFS should make every effort to ensure that its final Plan and EIS reflect legally binding relationships between the USFS and private mineral owners. (#324)

Sample Statement: Notably, this section has been omitted from the new standards and guidelines and they make no mention of shared use or entitlement to surface minerals. The proposed standards and guidelines simply state that road surfacing will be accomplished with stone obtained from pits identified by the Forest Service or with commercially available stone. In Appendix F, titled Oil and Gas Development on the ANF, to the Allegheny National Forest Draft Environmental Impact Statement (DEIS) the last paragraph on page F-3 states as follows: “Unless specifically mentioned in the mineral deed, common variety minerals belong to the surface estate.” Legally, this statement does not correctly describe Pennsylvania law with respect to fee ownership of surface minerals. Further, the statement does not recognize a mineral owner's right to use surface materials (stone and gravel) incident to the express or implied rights of ingress and egress in Oil, Gas and Mineral reservations. This ownership statement should be removed from the DEIS. Additionally, the current “Mineral Materials” language, which recognizes the long-standing and established practice of shared entitlement between the federal surface and private mineral estates, should be retained and strengthened in any revision to the forest-wide standards and guidelines of the Plan. (#275)

Response: The Forest Service maintains that common variety minerals are part of the surface estate, unless expressly severed in the deed to the mineral estate.

3.5.2 OGM Development Projections

Public Interest #83: The Final EIS should contain revised OGM development projections.

RECONSIDER FUTURE PRICE

Sample Statement: We believe that the DEIS underestimates future development by considering a “most likely scenario” as simply an average of the historic trend of 225 wells/yr. and a high quarter scenario of 800 wells/yr. This is an unsophisticated and inaccurate analysis. The Forest Service acknowledges that oil and gas development increases as the price of oil and gas increase. Yet neither the “historic trend”, the “high quarter scenario” nor the “most likely scenario” (which is simply the average of the other two) are linked to projected future oil prices. We understand the difficulty in projecting future development as oil and gas prices are notoriously volatile, and the price of oil and gas and the rate of development are likely not precisely correlated as, for example, there may be a lag in development as developers react to rising and falling oil prices. At a minimum, however, we would expect the Forest Service to tie the analysis to some real-world projection of future oil and gas prices. For example, the Department of Energy’s Energy Information Administration published an Annual Energy Outlook 2006. It projects oil and gas prices to stay at high levels and not to return to the low prices of the past. (#327)

RECONSIDER THE IMPACT OF RECLAMATION

Sample Statement: In the USFS Most Likely Scenario, the DEIS projects that private oil and gas activities will occupy a total of 20,384 acres of land concentrated within the known oil and gas fields inside ANF Proclamation Boundaries by 2020. The occupied area would equal for 4.0 percent of the entire ANF land base. If USFS estimates of private well plugging as associated land reclamation activities are taken into consideration, the net impact on ANF lands would be reduced substantially. (#324)

RECONSIDER DETERMINATION OF THE SATURATION POINT

Sample Statement: Another troubling element of the DEIS projections of future private oil and gas activity is the conjecture on when oil and gas development on ANF lands will reach a “saturation point”, i.e., “when the entire forest, minus USA owned minerals” or other portions of the forest would be developed. After noting that “predicting development scenarios after 2020 is very speculative,” the USFS proceeds to conduct an analysis of three possible land development scenarios to look for a saturation point. In each scenario, the analysis assumes that development will occur uniformly with three different well spacing matrices, one for shallow primary oil well development, another for secondary oil well development, and a third for gas well development. The analysis then builds a table of potential well saturations that vary depending on the amount of land considered available for development in each scenario. With no apparent justification, the analysis then concludes that the forest saturation point is 20,000 wells. It appears that the well count was chosen primarily because it fits nicely into the matrix and it demonstrates that the High Quarter Scenario for well development is feasible. The assumption built into the analysis of well saturation potential in the ANF that only one type of well will be drilled uniformly across the forest for each different scenario is completely unrealistic, and the conclusion that 20,000 wells is the saturation point is unfounded. (#324)

RECONSIDER STATISTICAL ANALYSIS

Sample Statement: The projections of potential future private oil and gas development discussed in the DEIS are based on a poor grasp of the statistical value of the limited data used for the analysis. The High Quarter Scenario assumes that the industry will drill 800 wells per year for the next 15 years simply because 200 wells were drilled in a three-month period in 2005. The Scenario has no statistical validity because it is based on the dissection of a single data point from the last 20 years of drilling activity. It has no more (or less) analytical

value that an alternative Low Quarter Scenario that could be extrapolated from the 1996 data point...The Most Likely Projection Scenario of 512 new wells drilled per year through 2015 is also of specious value because it is based on an average of the dubious 800 wells per year High Quarter Scenario and the average number of wells drilled over the 20 year historical trend. (#324)

USE REGRESSION ANALYSIS

Sample Statement: Basing any projections of future activity on one set of data - in this case, the 20- years of drilling activity on the forest - should be viewed with some skepticism. This is particularly the case with projections of oil and gas drilling activity, which can be affected by any number of independent variables, the most important of which is the wellhead value of crude oil and natural gas. Nevertheless, the 20-year drilling history on the ANF could form the basis for speculating on potential future well drilling because current oil and gas wellhead prices are generally inherent in the level of activity that occurs in any given year...One possible approach to the well drilling data that could be considered is regression analysis to project potential future drilling activity on ANF lands. The projected results may have some use in the evaluations of the affected environment and environmental consequences in Chapter 3 of the DEIS. (#324)

Response: Oil prices and the future levels of private oil and gas development on the ANF is very speculative. This is why the different scenarios of oil and gas development are described in Appendix F. The oil and gas industry has had a cyclical history of rapid expansion followed by periods of stability or contraction. The ANF does expect that the recent rise in oil prices will spark higher levels of development above the average activity of the past twenty years. However, it does not expect the highest levels of development recently experienced will be sustained throughout the entire life of the LRMP. For this reason it has chosen a scenario that blends the historic and recent high levels.

The \$50 oil price was selected solely to gain some estimate of the cumulative economic effects of the oil and gas activity on the ANF using an input-output model built on information from 2002. It is not part of Appendix F and was not used as part of the rationale for future oil and gas development scenarios.

As described in Appendix F, most of the wells that are plugged on the Forest are abandoned wells that are not counted in the current estimate of active wells. Therefore, well plugging activities were not considered to be land reclamation activities that reduce the land area affected by OGM development.

3.5.3 Effects of OGM Development

Public Interest #84: The Final EIS should acknowledge the positive social and economic benefits OGM development has on local communities and address how the Forest Plan impacts these benefits.

Sample Statement: The economic analysis of oil and gas development in the ANF and the Plan's impact is deficient. In its economic analysis of oil and gas development in the ANF, the Forest Service limited its narrow analysis to the average cost of well drilling and anticipated production income. See, DEIS, Appendix F, at pp. F-10 - F-11...The economic analysis failed to account for or consider the contribution of oil and gas activities to regional economies...See, for example, DEIS, at p. 3-353 ("development of subsurface oil and gas resources on the ANF provides a substantial contribution to local economies"). In terms of employment numbers, oil and gas is not even presented as its own sector, instead being lumped together with mining or overlooked entirely. See, DEIS, Figure 3-25, at p. 3-346 (reference to mining, but not separately to oil and gas). Contribution of the oil and gas industry to the area economy is represented in the same fashion. See, DEIS, Table 3-101, at p. 3-355 (reference to mining, but not separately oil and gas). Not surprisingly, the discussion of annual salaries per sector does not even mention jobs in the oil and gas industry. DEIS, at p. 3-348. (#470)

Response: Oil and Gas development on the ANF is not a direct or indirect effect of the LRMP. This is an action of private owners and is addressed as a cumulative effect throughout the FEIS. Due to this fact, the ANF has substantially less information to reliably estimate such economic activities as oil and gas development, current and possible production, and operational costs. The Economics section of Chapter 3 does acknowledge and contains an estimate of the current and projected future economic contribution made in terms of employment and labor income of oil and gas development on the ANF.

Federal disclosure rules apply when only a limited number of firms are present in a particular industry. Sectors composed of very few firms cannot be disclosed. The Mining sector is the smallest sector encompassing oil and gas extraction activities that can be identified for this area.

Public Interest #85: The Final EIS should describe the cumulative effects of OGM development.

Sample Statement: Oil and gas extraction is a valid use on the ANF because of the unique oil and gas rights situation, but are the impacts of these activities being taken into account and at the appropriate scales? What is not in my opinion understood is the impact that OGM will have on the rest of the ANF. By this I mean if the ANF has, say 80,000 acres impacted by OGM (we all don't know if this is close to the actual impacted acres), those impacts do radiate out to the total forest - in a cumulative way. What needs to be done is the ANF needs to account for these impacts forest wide in loss of un-fragmented wildlife, plant habitat, aesthetics, stream continuity, etc. In other words, if something could not have happened on that land if OGM had been developed that use should be considered and implemented elsewhere. Developed OGM puts pressure on other acres to produce resources or those resources are not produced because of OGM activities. Use appropriate landscape scale and determine the cumulative impacts of OGM development on the total ANF within the 212Ga sub-region. (#214)

Response: The cumulative effects from OGM development were analyzed across the entire ANF and on each resource, which identified a cumulative effects boundary. See explanation in FEIS Chapter 2, Section 2.8 Estimation of Private Oil and Gas Development (p. 2-59) that was used to frame the assumptions analyzed under each resource. See cumulative effects analysis for each resource in FEIS, Chapter 3 at: Soils (p.3-16), Water (p. 3-40), Air (p. 3-53), Transportation (p. 3-63), Forest Vegetation (p. 3-145), Plant & Animal Habitats (p. 3-244), recreation opportunities and Forest Settings (p. 3-274), Congressionally Designated Areas (p. 3-286), Administratively Designated Special Areas (p. 3-311), Scenery Management (p. 3-322), Heritage Resources (p. 3-329), Forest Products (p. 3-341), Economics (p.3-360) and Social Conditions (p. 3-384).

The LRMP defines standards and guidelines used as design criteria to protect other resources from effects caused by oil and gas development (LRMP pp. 90-92). Also, project level measures are applied to avoid, minimize, or rectify adverse effects.

Public Interest #86: The Final EIS should include an analysis of OGM development effects on interior forest avian species.

Sample Statement: We see expected increases in roads and associated development related to OGM extraction in the next 20 years, but no expected impact on forest interior species. An adverse effect of road and site development for the projected OGM development is further fragmentation of the forest. Fragmentation has a demonstrated impact on forest interior and area sensitive species, and there is a large body of literature on it, mostly affirming/validating the effect (e.g., see Manolis et al., 2002, Edge effect on nesting success of ground nesting birds near regenerating clearcuts in a forest dominated landscape, Auk 119:955-970). An assessment of edge density or similar kind of fragmentation analysis (predicted size/area of forest blocks that will result from such development) associated with the alternatives, so that impacts on these species can be evaluated, is needed. As stated the ANF does not have direct control over access to mineral rights, but we're concerned that this factor has not been looked at. At a minimum, resource planners should do an analysis showing the best case (ANF roads only) and worse case (roads also developed under maximum

projected OGM development) to show what impact this will have on the alternative proposed plans. Some 42 species of forest interior obligates and area sensitive species...are potentially affected by this factor. In addition, viability outcomes (Appendix E) for none of the avian species at risk differ with identified alternative management plans. This result is unrealistic and suggests that additional analysis is needed to show likely positive or negative changes/trends for populations of many of these species in the Forest. (#13)

Response: While the DEIS did recognize a reduction in viability of some avian species due to fragmentation resulting from anticipated oil and gas development (DEIS p. 3-231), it was felt that the DEIS did not adequately address potential impacts of fragmentation as suggested. Accordingly, the FEIS includes a more detailed discussion of fragmentation related effects (FEIS pp. 3-214 to 3-215, 3-233 to 3-239 and 3-268 to 3-271). As suggested, the updated effects discussion also includes more recent information, including on-Forest monitoring related to nest predation. The Forest uses the Management Indicator Species (MIS) approach to reduce the complexity of discussing all species. While a number of avian species could be adversely affected by increased levels of fragmentation, and proposed timber harvest may increase levels of nest predation in the short term (see p. 3-239 of the FEIS), it is anticipated that nest production of forest interior species such as the cerulean warbler (which is an area sensitive MIS) will continue to occur at levels that support local and Forestwide populations of this species.

Potential impacts of fragmentation and disturbance associated with oil and gas are addressed in the effects discussion for both the northern goshawk (FEIS pp. 3-268 to 3-270) and the cerulean warbler (FEIS pp. 3-233 to 3-239, 3-270 to 3-272). Additionally, Forest monitoring indicates that the goshawk avoids areas of intensive oil and gas development and the Biological Evaluation (BE pp. 145-146 and 152-154) includes a more detailed assessment of potential impacts related to both well and road densities. The cumulative effects section (FEIS pp. 3-268 to 3-270) contains additional discussion of anticipated effects of oil and gas development to avian species. Although there is not an assessment of edge density as suggested, this analysis does identify large scale impacts from oil and gas development (up to 250,000 acres) to the northern goshawk, including a reduction in viability.

While there is expected to be a reduction in habitat for area sensitive species, including a reduction in viability for species sensitive to disturbance, considering that the preferred Alternative (Alternative Cm) maintains 88% of existing remote forest habitat, provides a 50% increase in available core habitat and provides a seven fold increase in the amount of late structural habitat (FEIS p. 3-220), it is anticipated that viable populations of sensitive species will be maintained on the ANF.

Public Interest #87: The Final EIS should reconsider listing Hastings and Salmon Creek as under development.

Sample Statement: There are many areas currently under development - mentioning Hastings and Salmon Creek only is not useful and could be misleading. Pg. ES-9. (#161)

Response: FEIS Section 2.8, p. 2-59 has been updated to state: "Recent development outside of historic known oil fields has occurred in the Hastings and Salmon Creek areas."

3.5.4 Mitigation of Impacts

General

Public Interest #88: The Forest Plan should outline a strategy to address OGM development concerns throughout the ANF.

Sample Statement: Because of our country's record setting energy prices due in large part to a lack of a coherent and productive energy policy, oil and gas drilling by private owners of sub-surface minerals on the

ANF has increased substantially. The impacts of this increased drilling on the other resources such as gravel, recreation, and timber can be significant. The plan does not appear to lay out a comprehensive action plan on how to address the issue on a strategic forest-wide basis. Such an action plan should describe the management and mitigation options as well as the necessary staff and resources needed to adequately carry out the plan. (#158)

Response: The LRMP provides a framework for managing the ANF, including development of subsurface rights. The strategy to deal with oil and gas is highlighted in the LRMP in the following sections: see new Goals (p. 15) and Objectives (pp. 20 and 21) with added emphasis for acquisition of mineral rights in areas of special designations. Also, see the forestwide Standards and Guidelines, particularly 2500 Watershed and Air (beginning on p. 72) and 2800 Minerals and Geology sections (pp. 90 to 93). The LRMP defines standards and guidelines used as design criteria to protect other resources from effects caused by oil and gas development. Also, project level measures would be applied to avoid, minimize, or rectify adverse effects.

Proper staffing is an administrative function attached to implementation and is not a Forest Plan decision. The FEIS includes a discussion on the budget needed to implement the LRMP (FEIS Appendix B, pp. B-78 to B081). Based on appropriations from Congress, implementation will need to be adjusted.

Public Interest #89: The Forest Plan should integrate other resource management with OGM development.

Sample Statement: I think it would be fair to say that if we just stand back and take a look at the thousands of acres that are being put over to commercial development in the context of oil and gas, what could we do with those roads from a non-oil-and-gas perspective? Perhaps those are areas we should look at for intensive management of the timber resources. In other words, we have the precisely appropriate infrastructure to manage those resources accessed by all those people that manage it or fence it or harvest it and have the road infrastructure there. That's not internalized in the plan anywhere near to the extent it could be. If you are looking at the areas where we have heavy oil and gas development and looking at that now for intensive timberland, there are recreational opportunities that might be a fit there. (#419)

Sample Statement: Additionally, all management areas in the Proposed Plan that overlay high potential oil and gas development zones and where management goals conflict with oil and gas development must be replaced with management areas that have resource management objectives compatible with active oil and gas development. (#484)

Response: The ANF used the information including Oil and Gas Fields and well locations in Appendix F in the development of Management Areas. Generally, oil and gas fields identified in Appendix F are not allocated to Management Areas where development would pose a fundamental conflict with surface management purposes. While it is acknowledged that these identified fields may not indicate the full potential for the development of the ANF subsurface, the fact of nonfederal subsurface ownership does not by itself indicate a certainty of development. MAs 5.1, 5.2, 7.1, 7.2, 8.1, 8.2, 8.3, 8.4, 8.5, and 8.6 contain objectives for subsurface acquisition do not acknowledge oil and gas development as part of the desired condition and may have design criteria regarding these developments.

All other Management Areas where oil and gas development currently exists or is expected acknowledge the context of this development in the desired conditions. Direction for other resources has also considered the influence of oil and gas development and measures for the conservation of surface resources. Most of these measures are contained in the forestwide design criteria (Part 3 of the LRMP). Effects associated with this oil and gas development have been disclosed in the FEIS in the cumulative effects section of each resource.

Public Interest #90: The Allegheny National Forest should not designate an OGM development Management Area.

Sample Statement: First, while significant energy development is anticipated during the life of the plan, we believe there's not a need to create any additional management areas for intensive energy development...That would prohibit or probably supersede vegetation management and because of the forest health issues and the other needs of the forest and of our industry, we don't support any additional unmanaged vegetative management areas. (#374)

Response: The ANF did consider creating a separate Management Area for areas of intense oil and gas development, but ultimately concluded not to do this.

Public Interest #91: The Allegheny National Forest should compensate for OGM development impacts by minimizing other surface disturbing activities.

Sample Statement: Even if the Forest Service, despite our arguments above, believes that it cannot do more to regulate oil and gas development, the Forest Service can certainly offset some of the impacts of oil and gas development it claims it cannot control by reducing surface disturbances and other impacts on the Forest in the areas that it can control. For example, it can reduce timber production, road building, and motorized recreation. Furthermore, it could apply timber sold to oil and gas developers against the Allowable Sale Quantity in order to reduce the overall level of deforestation in the ANF. (#327)

Response: When future projects are proposed, project analysis and design will consider the combined impacts from OGM development and other proposed ANF management activities. Decisions of this nature will be made at the site-specific level within the bounds of the management area direction for the specific area. ANF timber sold and harvested as part of OGM clearing and development on lands suitable for timber harvesting is considered part of the ASQ.

Public Interest #92: The Forest Plan should provide safety regulations to protect OGM workers, private property and persons residing near OGM developments.

Sample Statement: The draft Plan fails to adhere to applicable state and federal laws to protect the safety and property rights of persons residing in areas within the forest boundaries where such exploration, development, storage or production occurs. Residents' springs in Blue Jay were polluted. Forest County, Howe Township Supervisors had to shut down a main township road this past winter that was heavily damaged by oil and gas truck traffic in order to avoid liability for public safety. In the Watson Farm Road area, gas has been vented at ground level around residences causing an explosion and fire hazard...In 2006 a backhoe digging to replace culvert pipes on the ANF hit a buried high-pressure gas line. No maps identified the line's presence and emergency workers were unable to immediately locate shut-off valves, as no specific mapping was available identifying the location of these buried devices. The Allegheny has also experienced gas line fires in the forest. These conditions endanger all other users of the Allegheny. (#295)

Response: Safety is an important emphasis for the Forest Service and a number of standards and guidelines relate to safety questions. However, operational safety in the management of private oil and gas operations is the responsibility of the operator, not the Forest Service. The operators must comply with existing industrial OSHA standards, as well as Pennsylvania Code Title 25, Chapter 78. The Forest Service works with operators to promptly resolve spills, leaks and other problems.

Public Interest #93: The Final EIS should analyze technological options to reduce OGM development impacts.

Sample Statement: Isn't there a way with the drilling technologies that have been developed since Drakes well first went in to drill fewer wells? (#277)

Response: While mineral owners have the right to develop their mineral estate, the LRMP defines standards and guidelines used as design criteria to protect other resources from effects caused by oil and gas development. Also, project level measures are applied to avoid, minimize, or rectify adverse effects.

Acquisition of Mineral Rights

Public Interest #94: The Forest Plan should include a program to obtain ownership of subsurface property rights.

IN WILDERNESS STUDY AREAS AND REMOTE RECREATION AREAS

Sample Statement: The Proposed Plan designates certain areas as Wilderness Study Areas or Remote Recreation Areas, with such designations precluding road development and timber cutting. However, the Plan does not adequately account for the impact that a significant increase in the amount of oil and gas development will have on such areas...For example, the Forest Service manages approved Wilderness Study Areas to “preserve wilderness values,” which is simply not possible if oil and gas development occurs...In essence, unless these subsurface rights can be purchased by the federal government or these areas and the associated rights are condemned, little can be done to prevent the increased exercising of oil and gas rights within the Allegheny National Forest. (#476)

IN AREAS OF HIGH ECOLOGICAL VALUE

Sample Statement: It is particularly challenging to plan and implement any kind of sustainable, long-term management without the full ownership of property rights for the areas under management. Select areas of high ecological value can be considered for special use designation, legislative withdraw of mineral rights, third party purchase of these rights, or proactive management arrangements with oil and gas developers. [We] have identified several areas within the ANF that are of high ecological value, especially related to large, contiguous sections of forest, and may be the best opportunities to concentrate efforts to reduce the subsurface exploration potential and consequent surface disruption. These landscape-level areas can serve as pilots in applying some or all of the strategies mentioned. (#95)

Response: A LRMP objective found in 5400 Land Ownership is to work with partners to acquire subsurface ownership of lands in MAs 5.1, 5.2, 7.1, 7.2, 8.1, 8.2, 8.3, 8.4, and 8.5 (LRMP p. 21). Chapter 3 of the FEIS indicates that 57,000 acres of the ANF are sought for mineral acquisition, primarily for conservation of natural areas. This represents approximately 11% of the ANF. On the rest of the ANF, cooperation between subsurface owners and the ANF is anticipated to facilitate oil and gas development that is consistent with maintaining surface values. Both the desired condition of the Forest and the desired condition of individual management areas recognize oil and gas development.

The ANF recognizes that oil and gas development may occur in Remote Recreation Areas as well as proposed Wilderness Study Areas. The FEIS (p. 3-343) states in the cumulative effects section for both recreation and special areas that “the number and intensity of oil and gas disturbance . . . may reduce or eliminate the present wilderness character and potential of these areas.”

See pp. 24-29 of the LRMP for a discussion on Special Designations and Management Areas. Chestnut Ridge and Minister Valley are recommended for wilderness study. Subsurface ownership would be addressed in the study.

Species with Viability Concerns

Public Interest #95: The Forest Plan should include standards and guidelines to reduce the impacts of OGM development on species with viability concerns.

Sample Statement: We recommend development of a guideline for protecting species with viability concerns so potential impacts can be mitigated. (#246)

Sample Statement: In the Dakota Prairie Grasslands Management Plan, the Forest Service developed a specific Management Area that addressed habitat for bighorn sheep where the subsurface rights were privately owned. Management Area 3.51 manages bighorn sheep habitat “to provide quality forage, cover, escape terrain, and solitude for bighorn sheep.” Management Area 3.51A manages bighorn sheep habitat “to provide quality forage, cover, escape terrain, and solitude for bighorn sheep while accounting for the possible development of the non-federal mineral ownership.” The Forest Service subsequently developed “desired conditions” and specific “standards and guidelines” in accordance with NFMA regulations for Management Area 3.51A, just as they did for all the other Management Areas. This clearly demonstrates that the Forest Service can develop Management Areas to “account for the possible development of the non-federal mineral ownership” by adopting similar habitat requirements for the Cerulean Warbler and other species in the Allegheny as the Forest Service did in the Dakota Prairie Grasslands (#327)

Response: The effects of oil and gas development, including impacts to species with viability concerns, were recognized and discussed in the FEIS (pp. 3-268 to 3-277). Also, in an effort to reduce potential impacts from anticipated oil and gas development to forest resources, design criteria identified in the LRMP will be utilized to apply in the exercise of the Forest Service’s role, limited as it may be, in the development of private mineral estates on the ANF (ROD p. 29).

Public Interest #96: The Forest Plan should include a standard that requires information on endangered species and species of concern to be transmitted to the PA-DEP for consideration on issuing OGM development permits.

Sample Statement: Forest-Wide Design Criteria, 2800 Minerals and Geology Standards. As for the specific standards, we submit the following comments...The proposed Standards state that known locations of federally-listed proposed, threatened, or endangered species will be documented in a letter to the operator and that responsibility to comply with the Endangered Species Act will rest with the operator. Furthermore, the Standards state that species with viability concerns will be brought to the attention of the operator and measures to mitigate potential impacts will be negotiated. However, given the PA Gas Act requirement that the DEP must consider the impact of a proposed well on “endangered” and other “critical communities,” we propose a standard that this information will be made available to the PA DEP before issuance of a permit, so that the PA DEP can “consider” such impacts and impose conditions on the permit. (#327)

Response: The Forest Plan does not preclude providing information on species with viability concerns to PA-DEP and the OGM developer. The ANF currently does this for several sensitive species, working with all parties to avoid or mitigate impacts to these species. The ANF works towards taking measures to avoid potential impacts as early in the process as possible. Oil and gas developments will be evaluated against the design criteria of the LRMP. In addition, see response to PI #95.

Soils and Water

Public Interest #97: The Forest Plan should include standards and guidelines for OGM development to protect watersheds.

Sample Statement: In July 2002, a report prepared by the Pennsylvania Department of Environmental Protection (DEP), documented that three high quality watersheds on the Allegheny National Forest that are

supposed to be protected under the Clean Water Act had been impaired by oil and gas development. The DEP conducted surveys in the Salmon Creek watershed near Marienville. The DEP's report identified that streams impacted by oil and gas developments received lower scores in terms of water quality and total biological conditions than reference streams that had little or no up stream oil and gas development. The report specifically pointed to road construction associated with oil and gas development as the main threat to water quality. (#295)

Response: The ANF acknowledged this study in the FEIS: 3.2.3 Water Resources, Cumulative Effects, Roads. In this study, recommendations were made to improve runoff problems. Runoff conditions were improved when the ANF reconstructed FR 127 with limestone surfacing. In addition, portions of FR 165 and FR 631 were surfaced with limestone and stream crossings were improved to reduce runoff into streams. The ANF will continue to work with operators and the PA-DEP to ensure compliance with anti-degradation requirements.

As identified in the new LRMP objectives for oil and gas development, areas of concern will be identified and corrected through collaboration with OGM operators. The LRMP monitoring section has identified the need to monitor macroinvertebrates, water quality, and OGM sites.

See LRMP Part 3, Design Criteria, section 2500 Watershed and Air, and section 2800 Minerals and Geology, Standards and Guidelines, pp. 90-92 regarding resource protection.

Public Interest #98: The Forest Plan should require OGM operators to comply with state and federal regulations and policies to protect soil and water resources.

Sample Statement: Under Forest Service File Code 2800 (Minerals and Geology), we offer the following comments to the “Private Minerals” section: In the fourth paragraph under “Standards,” we would edit to reflect that the OGM operator must comply with Commonwealth regulations and policies for erosion and sediment control, and Commonwealth and Federal law and regulations for spill prevention and response...In the seventh paragraph under “Standards,” we would edit to reflect that the OGM operator must also manage and dispose produced fluids, drilling and completion fluids, and other pollutorial substances in compliance with Commonwealth regulations and Federal Clean Water Act. (#246)

Response: OGM operators are required by law to follow Commonwealth regulations and the Federal Clean Water Act. The first standard listed in the 2800 Minerals and Geology section of the LRMP states that oil and gas development comply with Commonwealth and Federal Law (LRMP p. 90). In addition, the ninth standard in this section requires produced fluids to be handled and disposed of according to the Commonwealth of Pennsylvania Oil and Gas Act in accordance with the Clean Streams Law as described in Pennsylvania Oil and Gas Manual.

Public Interest #99: The Final EIS should assess the risks to water resources and human health from hydraulic fracturing and the use of frac’ing fluids by oil and gas developers.

Sample Statement: The Draft Plan does not assess risks to Pennsylvania public water resources and drinking water sources from hydraulic fracturing and the use of frac’ing fluids by the Oil and Gas Industry. (#295)

Response: OGM operators are required by law to follow Commonwealth regulations and the Federal Clean Water Act and the Safe Drinking Water Act. The first standard under 2800 Minerals and Geology (LRMP p. 90) states that OGM development will comply with Commonwealth and Federal Law.

The Oil and Gas Act 223, Chapter 2 provides for protection of water resources and drinking water sources from oil and gas operations. Section 601.205 addresses well location restrictions including water wells, streams and wetlands; Section 601.207 addresses the protection of fresh groundwater and casing requirements; and Section 601.208 addresses the protection of water supplies.

Public Interest #100: The Allegheny National Forest should enforce erosion and soil control standards for OGM developers.

Sample Statement: Current oil and gas regulations (erosion and soil control plans) should be vigorously enforced. (#199)

Response: Enforcement is an implementation issue and is beyond the scope of Forest Plan Revision. OGM developers are responsible for the implementation and maintenance of the erosion control plan (LRMP p. 90).

Roads

Public Interest #101: The Final EIS should include budget information regarding construction and maintenance of all OGM development roads.

Sample Statement: If the subsurface is 93% in private hands, and...in 15 years there will be an estimated 15,680 wells and 3,122 miles of private gas and oil roads in 2020 on national forest land, then: - Who is going to pay for the cost of the new roads and the maintenance of all oil/gas roads? (#2)

Response: The OGM operator is responsible for the cost of constructing and maintaining their roads.

When a commercial user such as an OGM operator uses a FS road, they are required to obtain a commercial road use permit. They are responsible for their share of the maintenance due to this use. The Forest Service term for this is commensurate use. The procedures for determining commensurate use and road maintenance rates are found in FSM 7730 and FSH 7709.58.

In addition, see response to PI #102.

Public Interest #102: The Allegheny National Forest should charge OGM developers for the use of Forest Service roads.

Sample Statement: In the event numbered Forest Service roads are used in any way for hydrofracturing, brine removal, well service, and all other traffic; a reasonable charge per mile shall be charged each operator for Forest Service road use. Using funds collected for road use, an account shall be established to go toward road maintenance costs. (#293)

Response: Forest Service policy is to charge commercial road users (timber, OGM, others) for the use of Forest Service Roads. Rates are determined based on commensurate use and actual maintenance costs. In 2005 the ANF collected approximately \$300,000 in road use fees from commercial users. These funds are placed in a fund called Cooperative Work Forest Service (CWFS) and used to perform road maintenance on Forest Roads. In addition, at the discretion of the Forest Service, commercial road users may perform maintenance on Forest Service Roads in lieu of paying maintenance charges. It is estimated that in 2005 commercial road users completed \$100,000 in road maintenance in lieu of making payments.

Public Interest #103: The Allegheny National Forest should require OGM developers to submit a road and site plan.

Sample Statement: The FS does not own the subsurface rights on most of the ANF. But, the ANF controls the surface rights. Therefore, I propose that the oil and gas companies that intend to explore for their rights be compelled to submit a road and site plan for all new wells. This plan will be reviewed by the FS. Changes and upgrades will be added to their submitted plan. The FS will then monitor the construction of the roads and sites. The total cost will be passed on to the oil and gas companies. (#113)

Response: This is currently standard operating procedure. Currently, the ANF works with the OGM operators on the location of roads and wells. The FS reviews the proposed locations and suggests changes based on resource considerations. Modifications to the road and well locations are then negotiated with the OGM operator. Costs for this work by the FS are passed onto the OGM operator as the law permits (LRMP p. 90).

Public Interest #104: The Forest Plan should require OGM road maintenance to follow the same standards and guidelines as ANF roads.

Sample Statement: Road maintenance on private roads should be held to the same guidelines and standards as ANF managed roads to address restoration efforts such as seeding and re-contouring of roads. (#95)

Sample Statement: The U.S.D.A. Forest Service should also be requiring oil/gas operators to build and maintain oil roads to a much higher standard, including standards for better drainage and layers of 2RC and 2B gravel. These tougher guidelines should be incorporated into the 2006 Forest Plan Revision for the Allegheny National Forest. (#292)

Response: We have made an addition to the LRMP that OGM development roads will meet Forest Service standards and guidelines (LRMP p. 91).

Public Interest #105: The Allegheny National Forest should decommission Forest Service roads and shift use to improved OGM roads.

Sample Statement: During the Western Pennsylvania Conservancy symposium at the Warren Holiday Inn in June, 2006, it was pointed out that oil roads make up a significant amount of dirt road mileage on the Allegheny National Forest. It was also suggested that the recent oil boom means that oil road mileage will likely escalate significantly in the years ahead. I have noticed that many oil roads seem to parallel existing state roads and Forest Service roads in the woods...Perhaps the Forest Service should look at decommissioning more Forest Service roads and shift the traffic (and the responsibility for road maintenance) to improved oil roads. Perhaps this could be a way that the U.S.D.A. Forest Service could use its oil/gas “partnerships” to deal with a backlog of Forest Service road maintenance on the Allegheny National Forest. (#292)

TO FACILITATE RECOVERY OF AQUATIC HABITAT

Sample Statement: The 1,000 miles of oil and gas roads and 8,000 wells is an awesome liability that you must compensate for. You have a fragmented forest in many ways and places. Your GIS has discovered even more roads. I am delighted to note you will assume ownership of many and apply standards. This is important to reduce their impact. “Decommission” what you can. Surely you can limit new wells which would absolutely prevent scenic and hydrological recovery which might be underway by 2020. Can this be your 2020 vision for this multi-use public forest? Recovery in destabilized streams and channels and brook trout potential would be foregone. You are right to predict aquatic resources decline due to roads - in spite of your efforts. You might begin to reverse this with restrictions and aggressive locking and decommissioning of roads. (#20)

Response: There are two possible scenarios. First, OGM has a development and the FS needs access into the area. In this case, the FS works with the OGM operator to use the OGM roads. If they are not constructed to the appropriate standard, they are improved. Some realignment may occur to reduce erosion, sedimentation and wildlife concerns. Any improvements or realignments would be considered during site-specific analysis.

In the second scenario, the FS has a road into an area and the OGM operator is going to develop the area. Every effort is made to utilize the existing road system prior to constructing a new corridor. The FS road is typically used as the backbone for laying out the OGM roads. The OGM roads seem to parallel state and FS roads because

the wells that are being accessed are laid out in a grid pattern, anywhere from 250 to 1300 feet apart. Accordingly, the OGM operator needs roads every 250 to 1300 feet.

No matter whose road it is, the parties utilizing the road should be responsible for maintenance commensurate with their use, it being recognized that the FS is responsible for public use such as hunting, recreation, fishing and driving for pleasure. OGM roads are not open to the public. They are there to provide access for the OGM operator. Should an area need public access by way of an OGM road, the FS will work with the OGM operator to provide this opportunity.

Roads that are no longer needed will be decommissioned. If this is an OGM road, the FS will determine if the road is needed by the FS in the future, in which case the FS takes over the road. If the FS does not need the road, the OGM operator is responsible for decommissioning the road and well site.

Public Interest #106: The Allegheny National Forest should review the road system to determine which roads are necessary for OGM use.

Sample Statement: The road system currently in place should be further reviewed to determine whether all roads are necessary for current oil and gas production. (#95)

Response: This is standard operating procedure. These procedures are documented in FSM 7710. During project level Roads Analysis (RAP), every road is examined to determine the uses that occur and the risks associated with the road location and use. Recommendations are then made to reduce the potential impacts from the roads. Any roads for which a legitimate use cannot be determined are recommended for decommissioning. It is the nature of a road system that every road will not be used for every use. Coordination between the Forest Service and the OGM industry works towards maximizing joint use. The roads currently being used by the OGM industry are shown in the FWRAP on map 24.

Public Interest #107: The Allegheny National Forest should require OGM roads to be narrower and placed under the canopy.

Sample Statement: Can something be done to minimize the impact of roads to gas and oil wells? These roads seem excessively wide for their function. Couldn't they have a small pad for the well, and a narrow road under the canopy. (#129)

Response: Every effort is made to minimize the amount of clearing for OGM roads (as well as Forest Service Roads) and well pads. Section 2800 Guidelines, item 3 on p. 91 of the LRMP speaks directly to this.

Currently, well pads are typically limited to 1/4 acre of clearing. While this may seem like a large area, during the drilling and fracing process many of the vehicles needed for these processes must be parked on the adjoining roads. Making the well pad smaller and/or parking additional vehicles on the road becomes a safety hazard.

Within the clearing limits for roads, pipelines, electric lines and other utilities are buried. Alignment of these utilities with the road system results in minimizing the total clearing for the development. Occasionally, these utilities need to be installed cross country.

Public Interest #108: The Allegheny National Forest should locate wildlife openings where OGM roads provide access.

Sample Statement: Constructed wildlife openings should be placed where existing Oil and Gas roads already provide access where possible. I understand that some OGM areas may not provide the level of isolation desired but others are very seldom visited and disturbance is minimal. Using existing roads will provide easier and more economical access. In some instances existing openings may be enhanced to provide desired habitats. (#161)

Response: The site-specific placement of new wildlife openings is a decision that is made at the project level. Some newly constructed wildlife openings will likely be placed near OGM roads while others may not.

Well Sites and Pipelines

Public Interest #109: The Forest Plan should require plugging of orphan wells, decommissioning of unused access roads and well site restoration.

Sample Statement: Under Forest Service File Code 2800 (Minerals and Geology), we offer the following comments to the “Private Minerals” section: In the eighth paragraph under “Guidelines,” under Commonwealth law and regulations, the well site must be restored after drilling and after plugging the well. We therefore recommend that this not be a guideline but a standard, as it is a Commonwealth requirement. (#246)

Sample Statement: Developers should be encouraged to plug orphan wells as they enter into new lease agreements. If wells have been plugged, consideration should be given to the decommissioning and reseeded of these access roads. (#95)

Response: Under Pennsylvania Code Title 25, Chapter 78, Subchapter D, oil and gas operators are required to plug wells they have abandoned or which may impact new wells. For old abandoned wells where no owner can be identified, the responsibility for plugging lies with the PA DEP through their Orphan or Abandoned well plugging programs.

LRMP Part 3, Design Criteria, section 2800 Minerals and Geology (LRMP p. 91) has revised language on restoration of well sites and roads to a standard as suggested.

Public Interest #110: The Forest Plan should require OGM well pad construction to meet Forest Service specifications.

Sample Statement: All well pads shall be constructed to Forest Service specifications with approved material (at the mineral operator's expense). Pumpjacks must be painted “Rustoleum Brown”. The well pad/pumpjack must be periodically checked and approved by the Forest Service. The well pad must be mulched and seeded. All drilling “fines” shall be blown into a lined pit. There shall be no fines blown off on to the drilling area on vegetation. The pit will be sealed after the well is completed. (#293)

Response: See LRMP Part 3, Design Criteria, section 2800 Minerals and Geology pp. 90-92 for standards and guidelines that address the issue of stabilizing disturbed areas and the disposal of cuttings from well drilling as a result of OGM activities. See also response to PI #111.

Public Interest #111: The Forest Plan should include additional OGM tank battery standards and guidelines.

Sample Statement: Regarding oil storage tanks (tank batteries), they shall be located either in a screened area or screening must be planted. Sufficient dikes must be calculated and built so as to act as an effective catch basin in the event of an accident. Tanks and accompanying infrastructure must be painted and maintained, subject to inspection. All tanks must have lockable hatches and tamper-proof valves to prevent accidents and vandalism. (#293)

Response: See LRMP Part 3, Design Criteria, section 2800 Minerals and Geology, Guidelines, p. 92, item four for visual guidelines applicable to pump jacks and storage tanks. See Pennsylvania Storage Tank and Spill Prevention Act of 1989, P.L. 169, No. 32 (amended 1/30/1998, P.L. 46, No. 13) for tank construction and maintenance requirements.

Public Interest #112: The Forest Plan should require visual screening and beautification of OGM development sites.

Sample Statement: Maybe have some of the roads paved or at least put up some beautification with some flowers or shrubs around those green things that are standing all over the place. (#357)

Response: The LRMP defines standards and guidelines used as design criteria to protect other resources from effects caused by oil and gas development including scenery (LRMP 2380 section, pp. 62-64). Also, project level measures are applied to avoid, minimize, or rectify adverse effects. In addition, see response to PI #381.

Public Interest #113: The Forest Plan should require a specific timeframe for removal of OGM drilling materials.

Sample Statement: All infrastructures such as pipe racks, tank storage, pipe storage, or other materials shall be stored at a site “off Forest”. It is acceptable to have materials at hand when the wells, etc, are being drilled; however after a set amount of time to be determined by the Forest Service, it must be removed off the Forest. (#293)

Response: See LRMP Part 3, Design Criteria, section 2800 Minerals and Geology, Standard, p. 91, paragraph 3. No long-term equipment storage is allowed.

Public Interest #114: The Final EIS should analyze planting at OGM developments to benefit wildlife species and improve biodiversity.

Sample Statement: The gas and oil drilling is not all under your control...However, we can learn to use these openings to wildlife best advantage. All the surface damaged areas that are impacted should have numerous tree and shrub species planted and fenced if need to assist with regaining the biological diversity of the forest. Such areas should have the contractors supply the funding or the actual product and labor to re introduce more of the following. White Pine, Red Pine, Balsam Fir, Eastern Hemlock, Spruce Trees (white, red, Norway, black, others) Mugho Pine, American Yew, some junipers and some arborvitae or white cedars. Also, the gas and oil well areas could be used to introduce some of the warm season grass species along their edges. I think with all the stone and dirt they put down that if some warm season grass seed was mixed in on the edges in a few years it would be common along the roads which would add to the road side plant mix hopefully without any problems. Also these impacted areas can be used to reintroduce low growing conifers where suitable such as mt. laurel, rhododendron, and yew. (#278)

Response: Mitigating the impacts of oil and gas development by planting shrubs and trees is addressed at the project level. Nothing in the LRMP precludes the planting of native shrubs, trees, and grasses for wildlife.

Public Interest #115: The Allegheny National Forest should concentrate timber harvesting near OGM development.

Sample Statement: To the degree consistent with Late Structural Linkages, current stand ages and timber allocation models, forest stands scheduled for harvest should be concentrated in areas where OGM development, extraction, and transmission currently exists or is projected to occur. (#330)

Response: Decisions of this nature will be made at the site-specific level within the bounds of the management area direction for the specific area. When future projects are proposed, project analysis and design will consider the combined impacts from OGM development and other proposed ANF management activities on all elements of the affected environment (i.e., water, soils, wildlife, vegetation, etc).

Collaboration

Public Interest #116: The Allegheny National Forest should collaborate with the Pennsylvania Department of Environmental Protection and OGM operators to minimize the impacts associated with OGM development.

Sample Statement: It appears that the preferred alternative balances many of the issues associated with the ANF, however, based on our review; we have serious concerns regarding impacts to the Forest resulting from numerous activities, especially potential oil, gas and mineral activities...We strongly encourage the Forest Service to work with the PA DEP and the OGM developers to further avoid and minimize impacts associated with these projects. The FEIS should include details as to the minimization efforts that will be implemented. (#231)

Sample Statement: The Alternatives identify remote habitat areas, core areas and habitat connectivity. However, a caveat is provided that although ANF management would continue to reach the stated goals in these areas, development could occur and therefore impact the conservation values. Currently, ANF provides management direction for actions required by and to be negotiated with mineral operators. Recommendation: ANF should formalize a program to work with oil and gas developers to address management of acres identified as “core areas” that provide landscape connectivity. The Forest Service should work closely with the PA Department of Environmental Protection (DEP) to prepare more stringent requirements for road development, road access, and slopes. DEP's Best Management Practices should also be reviewed and possibly refined. (#95)

FORM A WORKING GROUP COMPOSED OF CITIZENS AND FS EMPLOYEES

Sample Statement: An Oil, Gas, and Mineral Task Force shall be established to be made up of ordinary citizens and Forest Service employees, not connected in any way to the industry, to review operations in each District and comment on conditions. Terms for service on the committee would be for two years and would be open to the public by application and review by the Forest Supervisor. The Committee would work in cooperation with the Forest Service employees directly in charge of the OGM operations on the Forest. (#293)

FORM A WORKING GROUP COMPOSED OF GOVERNMENT AGENCIES

Sample Statement: We therefore propose the following Plan Objective: Establish a formal multi-agency task force involving the Forest Service, DEP, and other appropriate State and Federal agencies to coordinate and oversee approval and regulation of oil and gas development in the ANF. (#327)

Response: The LRMP defines standards and guidelines used as design criteria to protect other resources from effects caused by oil and gas development. The ANF works with mineral owners, the PA DEP, the Pennsylvania Fish and Boat Commission, and various other State and Federal agencies at the project level to avoid, minimize, or rectify adverse effects. We have added a specific objective to the LRMP (p. 20) to establish a formal multi-agency working group to coordinate policies and processes related to OGM development of the ANF.

3.6 Vegetation Management

3.6.1 General

Public Interest #117: The Forest Plan should contain vegetation management standards and guidelines that are mandatory instead of discretionary.

Sample Statement: Other MA's suffer from the same lack of mandatory standards and guidelines that provide some kind of enforcement mechanism. MA 2.1 (Uneven-aged management) states that: “uneven-aged forest vegetation management will be used throughout this management area except where it is desirable to provide habitat for species that utilize early structural habitats, to maintain shorter-lived shade-intolerant forest types such as aspen, or enhance visual variety and viewpoints in high Scenic Integrity Objective areas. In these situations, even-aged management may be appropriate.” (PLRMP pg. IV-7) In other words, uneven-aged management will be used unless the Forest Service decides to use even-aged management. In MA 2.2 (Late Structural Linkages), the Forest Service is supposed to be managing to provide “complex late structural forest conditions” but allows for two-aged harvests, shelterwood seed and removal cuts, intermediate thinnings, and other even-aged regeneration cuts...These are simply examples of how the PLRMP improperly and illegally shifts multiple mandatory standards from the 1986 Plan into non-mandatory guidelines...NFMA makes clear that management plans are supposed to create mandatory and enforceable limitations on the Forest Service's discretion when managing our national forests. To the extent the PLRMP fails to do this it violates the NFMA and the 1982 regulations. (#327)

Response: The LRMP clearly recognizes that site-specific decisions regarding the specific types of vegetative management practices are best made at the project level. For management areas that allow timber harvest including MAs 2.1, 2.2, 3.0 and 6.1, guidelines are the appropriate way to communicate this direction to allow flexibility for individual sites at the project level to best achieve the desired conditions of the plan and the management area. Project decisions that deviate from the harvest method guidelines will be expected to substantiate how that decision contributes to these desired conditions, goals or objectives. The LRMP also contains a substantial number of standards that would require plan amendment in order to deviate from them. The 1986 ANF Forest Plan did not clearly distinguish between standards and guidelines or how they should be interpreted in Forest Plan implementation. The LRMP provides for greater clarification of the interpretation of all Forest Plan decisions.

See also response to PI #1 for discussion on the role of standards and guidelines in the LRMP. See response to PIs #139, 141 and 142 for discussion on standards and guidelines specific to vegetation management issues.

Public Interest #118: The Allegheny National Forest should adopt the Kane Hardwood sustainability program.

Sample Statement: Key words as I see this would be balance and sustainability. You could take a program that Kane Hardwood has put together, a certificate of sustainability. I would hope you would take that in advice and follow the plan that Kane Hardwood has. (#409)

Response: We believe your comment refers to the Forest Certification evaluation of Kane Hardwoods (and also the Pennsylvania Bureau of Forestry) during the past few years. Forest Certification is not part of the Forest Plan Revision process. However, the ANF is one of six National Forests evaluated in 2006 as test candidates for certification. The evaluation is still in progress.

With regards to sustainability, the Forest Plan is designed to sustain the variety of resource uses called for in Alternative Cm. For additional information, see the goals, objectives, and suitable uses sections of the LRMP (pp. 12-16, 17-21, and 29-38) and Table 2-3 in the FEIS (pp. 2-54 to 2-58).

Public Interest #119: The Allegheny National Forest should consider the effects of vegetation management activities on adjacent properties.

Sample Statement: I own property that borders the ANF and am concerned with the possible lack of timber harvesting next to my wood lot and the effects it might have on mine. (#501)

Response: Please review the management area allocation map to determine the management area allocation for the ANF land that adjoins your property. The management area direction (LRMP, Part 4) for the ANF land that adjoins your property will give you an idea of the types of activities you can expect to see there. Site-specific decisions about where and when activities occur are made at the project level as part of Forest Plan implementation. Interested publics would have the opportunity for review and comment when site-specific projects are developed and evaluated. The cumulative effects discussions in the FEIS for each resource area assess the combined effects from past, present, and “future foreseeable” actions from activities on Federal and non-Federal land in the four county area surrounding the ANF.

3.6.2 Harvest Levels and Timber Sale Administration

Public Interest #120: The Forest Plan should not withdraw lands from timber production.

Sample Statement: I do not understand why you have to always withdraw land from timber production when actually timber production, along with water conservation, has always been the main purpose of the National Forest System, as mandated by law from its creation. With one-seventh of our nation covered with forests, there is no good explanation for this nation being reduced to a net importer of wood largely from countries that have less stringent management practices than we had 100 years ago on our public lands. It is time to make a statement that we are moving away from our addiction to un-renewable natural resources to sustainable multiple-use management of our public forest lands and that there will be no more withdrawal of land from timber production...We can have clean water, recreation, timber and wildlife management as the deliverables of every management plan. To say that we are going to not manage certain areas so that we can provide a “wilderness experience” is an unacceptable abdication of our responsibility to actively manage the overall health of the forest. (#242)

TO IMPROVE FOREST HEALTH

Sample Statement: In 1986 you had 463,143 acres of tentatively suitable forest land. At present you have only 388,387 acres categorized as suitable forest land. If I read your further revision correctly, you are planning to further reduce the suitable area for timber production to 339,568 acres. In other words, you are using the “salami technique” in reducing the amount of land suitable for timber production. This trend must be reversed for the health of the forest or else we will never reach the desired age mix. (#480)

Response: There are fewer acres of suitable land in the LRMP (Alternative Cm) than in the 1986 Forest Plan or in Alternative A (FEIS Table 3-105, p. 3-392). Some of the change (~22,500 acres) is due to an increase in water and non-forest land, primarily from improved mapping techniques (GIS) and improved inventory of openings, forest roads, water, oil and gas well pads, and other facilities (FEIS p. 3-392). About 20,500 acres result from identification of lands physically not suited because seedling restocking cannot be assured, and 18,700 acres result from congressional withdrawal of the National Recreation Area. Alternative Cm contains further reductions of approximately 29,400 acres to a suitable land area of 379,055 acres. Table 3-106 (FEIS pp. 3-394 and 3-395) displays the nature of these additional reductions. They originate from areas where harvest activity is considered inconsistent with the desire for a relatively undisturbed and naturally evolving forest landscape. A correction was made between the DEIS and the FEIS, which added roughly 20,000 acres back to the suitable land base in each Alternative due to an error in the calculation of land considered non-forested (developed) due to existing roads.

A detailed discussion of the process ANF personnel followed to determine lands suitable for timber production can be found in FEIS 3.4.6 Forest Products (FEIS pp. 3-391 to 3-392 and 3-394 to 3-395) and in FEIS Appendix B (pp. B-1 to B-7). The requirement for conducting such analysis can be found in 36 CFR 219.24. For more information, see pp. 15-28 of the ROD for the rationale for the allocation of management areas and the selection of Alternative Cm.

Public Interest #121: The Forest Plan should emphasize active management of timber resources.

TO IMPROVE REGIONAL SUSTAINABILITY

Sample Statement: It seems to me that while the ANF holds approximately 25 percent of our nation's black cherry trees that the percentage harvested is a much smaller percent. I believe that some of the management goals and desired forest condition can be accomplished more proactively through management not non-management. I am also concerned with effects of the proposed plan with its alternative on our region both economically and ecologically. Over the past 10 years especially, I am seeing an alarming trend in forest management. While black cherry has been in high demand, and the ANF has consistently reduced its ASQ, it seems as though it has been a quick cash crop for many private landowners. It seems many people have chosen to "sell off" their cherry in a market of high demand. I firmly believe active and balanced management on the ANF fosters active and balanced management outside the forest. I believe that the ANF has the ability to help regionally balance market conditions and as such assist the local and regional forests of our area. (#200)

FOR FOREST HEALTH

Sample Statement: The Plan must make forest health and long-term forest sustainability a priority, and this can only occur through active forest management. Throughout this planning process, the Forest Service has stressed the complex and critical forest health challenges facing the ANF. Beech Bark Disease, Hemlock Woolly Adelgid, sugar maple decline and impacts of weather events have lead to significant tree mortality on about one quarter of the forest. Pests such as Emerald Ash Borer and Asian Longhorn Beetle will likely become more immediate dangers during the life of this proposed plan. Deer and competing vegetation continue to have an impact on forest regeneration. These issues can not be addressed effectively without giving foresters the ability and flexibility to utilize the most effective management tools available. Failure to properly manage the forest will result in severe degradation of forest health and productivity. Declining forest health and the potential loss of some tree species will impact timber outputs, biodiversity and aesthetics. Future sustainability of species such as oak are critical to support game and other species. Forest health issues on the ANF also threaten the health and productivity of adjacent private and Commonwealth-owned lands. (#268)

Sample Statement: I find that a common thread of ensuring forest health runs through most of the forest user's goals. To this end, I encourage the preferred alternative be adjusted to allow for the most acres to be placed under forest management and to allow those managers of the forest to use all of the tools available to them. The proven research, technology, and implementation of harvesting techniques are the manner in which forest health can be achieved. Given the ecological conditions resulting from exotic pests and diseases coupled with the overbrowsing by deer for over 75 years - our forest cannot possibly return to pre-European settlement conditions. The old growth we have on the forest is falling apart. The mature stands we have on the forest lack regeneration. The biological lifespan of our species is approaching. Our forest health is declining and it must be addressed in the most aggressive way possible. Flexibility must be built into the plan at every level. The threats, demands, technologies, and economics will all change as time moves on. The final plan must be adaptable to these changes. Progress on the plan must be measured at regular intervals so the plan implementation can be refocused to the areas not meeting the goals set forth. (#457)

Response: We concur that active management is an important component of sustaining healthy forest ecosystems. Sustaining forest health is of utmost importance (in addition, see response to PIs #120, 123, and 158). Please note the ANF goal (LRMP p. 14) that states: “Provide a diversity of vegetation patterns across the landscape that represents well distributed habitats, a range of forest age classes and vegetative stages, a variety of healthy functioning vegetation layers, moderate to well-stocked forest cover, and the variety of vegetation species or forest types necessary to achieve multiple resource objectives.” We believe the selected Alternative provides the necessary balance to achieve these objectives. See the ROD (pp. 15-28, particularly pp. 22-26) for additional pertinent rationale.

The effects of the Alternatives on the production of forest products from the ANF are displayed in the Forest Products section of the FEIS (Chapter 3, pp. 3-394 to 3-399). Harvest activity in the four-county area is described in the vegetation management cumulative effects discussion in Chapter 3 (FEIS pp. 3-166 to 172 and pp. 3-176 to 3-179). The forest products cumulative effects discussion acknowledges that harvesting from the ANF will contribute towards a sustainable production of wood products from the immediate region (FEIS p. 3-398). The economic effects of the Alternatives, including employment, income, and potential payments to local counties are described in the economics section of FEIS Chapter 3 (FEIS pp. 3-410 to 419).

Sustaining forest health is a priority for the ANF, and the Forest Plan provides flexibility to deal with multiple types of threats when they develop using the best available technology (see response to PI #17). Pages 3-396 to 3-397 of the FEIS describe harvest activities that may occur on lands considered unsuitable for scheduled timber production. In Alternative Cm, 95% of the ANF is available for harvest activities for resource purposes such as addressing forest health concerns, responding to natural catastrophes, restoring forest cover, or to achieve recreation or wildlife objectives.

We agree it is important to maintain oak on the ANF in order to sustain the multiple benefits it provides (see response to PI #205).

We agree that trees on other ownerships within the ANF area also face the same forest health concerns described in the FEIS description of the affected environment (FEIS pp. 3-93 to 3-105).

Please note we have added several pertinent objectives to the LRMP (p. 15): 1) “Continue cooperating with research to provide sites for study and demonstration of sustainable ecosystem management.” And 2) “Use forest management activities to demonstrate sustainable silvicultural practices and land stewardship that could be used in forests on private lands.”

We concur that attempts to return to pre-European settlement vegetation conditions raise substantial forest health and forest sustainability concerns and questions. In addition, see response to PI #162.

We acknowledge your support for using a range of forest management techniques to sustain and improve forest health, including flexibility in using them to address changing conditions or to utilize new technology. We believe the LRMP provides the range of techniques and the flexibility you desire. For additional information, please refer to the responses to PIs #17 and 18.

Please note that the LRMP calls for monitoring to measure implementation progress and effects (LRMP pp. 37-52 and see response to PI #431). The monitoring plan identifies key questions where additional information can provide for adjusting management direction in the LRMP.

In addition, see response to PI #11.

Public Interest #122: The Forest Plan should increase the rates of annual timber harvest.

TO MAINTAIN A SUSTAINED YIELD

Sample Statement: Over the past several decades, the amount of timber harvesting has steadily declined in violation of the Code of Federal Regulations. These disturbing trends are in violation of the Code of Federal Regulations, the Multiple Use and Sustained Yield Act, and the Weeks Law of 1911. Therefore, in order to comply with federal law, the Proposed Plan must be rescinded and revised so that the amount of timber harvesting is sufficient to maintain a “sustainable yield,” to prevent the continuing decline of timber harvesting from decade to decade. (#484)

TO SUSTAIN PRIVATE FORESTLAND, THE FOREST PRODUCTS INDUSTRY AND THE ECONOMY

Sample Statement: The sustainability of Pennsylvania's forest products industry depends upon reliable and meaningful access to timber and other raw material from public lands. Currently, public agencies (including the Forest Service) own and manage approximately 30 percent of the forest resource in Pennsylvania, yet provide less than ten percent of the timber required to sustain the state's forest products industry on an annual basis. The lack of access impact timber markets, puts an economic strain on companies and threatens the sustainability of nearby private forestland over the long term. (We are) concerned about the continued erosion of acreage dedicated to timber production and the declining volume of wood products provided by this plan. The 1986 Plan called for an annual Allowable Sale Quantity (ASQ) of 95 million board feet. Actual harvest fell well below that volume, particularly since 1998. This decline has had an impact on forest product companies...The ASQ in Alternative C is 56 million board feet, a 41 percent reduction over the 1986 Plan. Much of this decrease is the result of specific Management Area designations and the extensive use of uneven-aged management in Alternative C. Recommendation: The ANF is a well-stocked, aging forest. For decades, the Forest Service has invested in the productivity of the ANF, with positive results. Now is time to harvest the results of this investment, or watch these investments go to waste as forest health and values decline. (#268)

Sample Statement: I am also concerned about the level of timber harvests allowed in the proposal and the resulting domino effect and the economic viability of the communities surrounding the ANF. The Forest Service's draft plan would reduce the annual volume of timber sold by more that 40% from the 1986 plan. This reduction will have a detrimental impact on the sustainability of communities surrounding the ANF. The study already states that the forest products industry in our local communities directly provides 8,000 jobs with an annual economic impact of \$2.7 billion for the region. The proposed reduction in harvest levels will result in US taxpayers losing \$400 million in additional revenue over the life of the plan. In addition, counties in the ANF Region will also receive \$4 million less in annual payments in lieu of taxes from the Forest Service. (#459)

TO IMPROVE FOREST HEALTH

Sample Statement: A healthy forest is critical to our region. Salvaging blowdown events, regenerating dying forest areas (such as those with beech bark disease), and responding to other natural events and insect and disease outbreaks should be the focus of the management efforts of the Forest Service. If all these problem areas are treated in a timely manner, the Allowable Sale Quantity (ASQ) will need to be raised to a higher level. The acres desperately needing treatment at this time should drive this number for this planning cycle. A more realistic ASQ volume is 75 million board feet per year. This volume would consist of approximately 50% sawtimber and 50% low value pulpwood. (#452)

DUE TO THE ABILITY TO REGENERATE UPLAND HARDWOODS

Sample Statement: The 1995 Timber Resource Capability Study projected that the current sustainable harvest would be approximately 53 MMBF per year. The study also indicated that the sustainable harvest could be as high as 72 MMBF per year if upland hardwoods could be adequately regenerated. Through adaptive management strategies and improved upland hardwood science, it is now possible to adequately regenerate upland hardwoods. Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative proposes and ASQ of at least 72 MMBF per year, and not 56 MMBF per year. (#476)

Response: Many factors have contributed to the reduction of Allowable Sale Quantity (ASQ) from earlier ANF Forest Plans, including forest health concerns, regeneration concerns, vegetation management and habitat goals, designation of special areas, more accurate mapping and determination of lands tentatively suitable for timber harvest in all of the Alternatives (see response to PI #120). Additionally, inventory data was updated to reflect both growth and recent mortality, and thus more accurately reflects standing timber volume on the ANF (see Appendix B, suitability for timber production and estimating yields sections, pp. B-1 to B-23). SPECTRUM model runs were constrained in all Alternatives to account for areas with reduced or deferred harvest to meet LRMP direction such as protecting unmapped springs and seeps, as well as other constraints (see Appendix B SPECTRUM Constraints). All Alternative models contain non-declining flow and perpetual harvest constraints. The ASQ is less than or equal to long-term sustained yield in all Alternative models. As stated in the Forest Products section in Chapter 3 of the FEIS, the ASQ is the maximum amount of timber that can be sold in each decade covered by the LRMP from lands suitable for timber production. Please note that Forest Plan Revision occurs specifically to meet changing forest conditions and therefore ASQ will change from one Forest Plan to the next. There is no requirement for ASQ to remain at the same level from one Forest Plan Revision to the next. See pp. 15-28 of the ROD, particularly pp. 26-27, for the rationale for the selection of Alternative Cm and a discussion of forest products.

Public Interest #123: The Allegheny National Forest should manage vegetation based on species viability and forest health and halt commercial timber harvest.

Sample Statement: [We] oppose commercial logging on federal public lands, including national forest lands. Polls have shown that the public does not want commercial logging on federal lands, we agree. Given that the national forests are held in public trust by the federal government, the FS should honor the wishes of the public and stop commercial logging on national forests. The citizens of this country are, after all, the ultimate owners of all national forest lands. (#329)

Sample Statement: PLRMP p. 1-9: 2400 Vegetation Management - We strongly oppose vegetation management goals aimed at changing forest composition to promote commercially valuable tree species. Vegetation management should be based on the needs of species with viability concerns and overall forest ecosystem health, not a desire to grow crops of commercially valuable timber. (#329)

Sample Statement: The ANF Draft Forest Plan Revision is simply an economic commitment to environmental abuse for the management of black cherry timber and sustained yield. The primary goal for the ANF Forest Management Plan must be to maintain or improve the ecological condition of the natural forest. ANF Forest Lands are not to be managed “on a sustained yield basis for timber” but managed based on what is biologically sustainable for the forest ecosystem. (#295)

Response: Under the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976, National Forest lands are to provide for a variety of sustainable uses to ensure a continued supply of goods and services to the American people. The MUSYA of 1960 specifically states the “National Forests are established and administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes” (16 USC 528). Forest Plans “shall provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long-term net public benefits in an environmentally

sound manner.” (36 CFR Part 219.1) Note that timber harvest is included as part of multiple use management for National Forests.

Note that the first goal of the 2400 Vegetation Management section of the LRMP (p. 14) states: “Provide a diversity of vegetation patterns across the landscape that represents well distributed habitats, a range of forest age classes and vegetative stages, a variety of healthy functioning vegetation layers, moderate to well-stocked forest cover, and the variety of vegetation species or forest types necessary to achieve multiple resource objectives”. This goal is consistent with the goal of providing high quality, hardwood sawtimber at a sustainable level to meet multiple resource objectives.

In addition, vegetation management on the ANF is driven by a variety of resource objectives (LRMP p. 14) including 1) providing the structural conditions and vegetation composition preferred by many wildlife species (LRMP pp. 102, 106, 109 and 113 and 126), 2) enhancement of late structural forest conditions (LRMP p. 111), 3) retention of key forest species such as oak (LRMP p. 19, 111), 4) increasing mast production (LRMP p. 111), 5) providing the diversity of forest types and age classes necessary to sustain ecosystem health (LRMP p. 14) and as suggested, 6) harvest of high value forest products (LRMP pp. 14 and 19).

Equally important are goals and objectives relating to sustaining species with viability concerns and for sustaining a healthy forest (LRMP pp. 14, 15 and 19-21). A number of design criteria are included in the LRMP to sustain species with viability concerns and maintain forest health.

Public Interest #124: The Forest Plan should not include lands that are not cost-efficient as suitable for timber production.

Sample Statement: The regulations at 36 CFR 219.14 are clear in that lands that are not cost-efficient should be tentatively identified as not appropriate for timber production. A negative net present value analysis area is not cost-efficient because there is no excess of discounted benefits less discounted costs. The costs are greater than the benefits, hence the negative value. The three conditions at section 219.14(c) are “OR” clauses, not “AND” clauses. Lands that are not cost-efficient must then be designated as not suited for timber production. The Allegheny NF determination of lands suitable for timber production must not include lands that are not cost-efficient. (#443)

Sample Statement: The constraints applied in the Spectrum modeling appear to be well thought out and reflect past harvest experience on the ANF in adjusting harvest frequency and extent. Some of the constraints appear to constrain harvest to an extent that we wonder how many analysis units dropped out of the solution per alternative because the lands were not cost-efficient over the planning horizon. Did the forest drop non cost-efficient analysis units from the solution? Please detail the number and acreage of analysis units per alternative that were dropped from the solution because they were not cost-efficient. (#443)

Sample Statement: Stage II requires that forest lands other than those that have been identified as not suited for timber production “shall be further reviewed and assessed prior to formulation of alternatives...” This phrase “other than those” implies that lands that have been identified in Stage I (for example (1) the land is not forest land; (2) technology is not available to ensure timber production from the land without irreversible resource damage to soils productivity or watershed conditions; (3) there is not reasonable assurance that such lands can be adequately restocked; (4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture or the Chief of the Forest Service) should be subtracted from the total Forest acreage and not be used in the succeeding stages of the suitability determination (“shall be further reviewed”). The discussion of the build of the yield tables, the lack of any recent information for vegetative conditions on certain lands on the ANF, including Congressionally designated Wilderness areas and the efforts detailed to gather and utilize this information make us question whether the lands described in 1-4 above were dropped at the end of Stage 1 or whether they were for some reason carried forward in the analysis. Were these lands dropped? Were they carried forward into Spectrum with the management area stratification (or some other aspect of stratification) meant to in effect “drop” these lands? Please explain. The

way in which the objective function was written and the (goal) programming method used could subvert the removal of any volumes on those lands from the solution. (#443)

Response: The ANF is managed for multiple use. The Alternatives provide various mixes of priced and non-priced objectives and responses to public issues. The results of the economic suitability analysis are presented in Appendix B (pp. B-85 to B-91). Lands that may not appear cost efficient solely on the basis of timber value minus reforestation costs receive management treatments to achieve objectives such as value to wildlife or other non-priced benefits. A minimum harvest management action is available to all analysis units in all Alternative models affording SPECTRUM the opportunity to not harvest. The PNV objective function will dissuade the harvest of analysis units that are less cost effective. Analysis units that have a negative timber PNV may be scheduled for management actions to achieve habitat structure desired conditions. Identification of suitable land area is not a final determination of the suitability of an area for a future proposed project or activity, and the influence general suitability identifications have on the direct, indirect, and cumulative effects of future projects or activities will be analyzed at the time such projects and activities are proposed.

Public Interest #125: The Allegheny National Forest should not harvest timber at a level greater than that of the Harvest Capability Report.

Sample Statement: It is stated that the 1995 Harvest Capability Report estimated a harvest level of 53.2 MMBF could be produced over the 1995-2005 period. Figure ES-4 shows an ASQ of 56.3 MMBF for Alt. C. Given the ever increasing number of forest health issues and mortality rate it does not seem logical to target a sustained yield above that of the Harvest Capability Report - this number could be reevaluated as the condition of the Forest changes. (#161)

Response: We acknowledge your preference for a reduced harvest level. The “Analysis of Timber Harvest Program Capability 1995 through 2005” (THPC) did estimate a maximum annual harvest level from 1995-2005 of 53.2 MMBF. However, it estimated a potential long term annual harvest level of 77.1 MMBF if adequate tree seedlings develop following shelterwood seed cuts (FEIS p. 3-390). Information identified during the THPC analysis that contributed to a lower harvest potential, including concerns related to forest health, has been considered during the current harvest level determination (FEIS pp. 1-12 and 1-13). In addition, see Appendix B and response to PI #122.

Public Interest #126: The Forest Plan should decrease the allowable sale quantity to a level proportionate to that of Pennsylvania State Forest lands.

Sample Statement: PLRMP p. II-9: Allowable Sale Quantity - The planned ASQ of 56.3 MMBF is excessive and demonstrates the extraordinary over-emphasis that the FS places on crop production of commercial timber in the proposed forest plan. A good basis for comparison is the projected annual harvest from Pennsylvania State Forest lands. The total acreage of the state forests is approximately 2.2 million acres. The state forest management plan projects an annual harvest of around 55-60 MMBF. In contrast, the PLRMP proposes an average of 56.3 MMBF of logging taken only 500,000 acres. The FS is proposing nearly as much annual logging as the state Bureau of Forestry using less than 1/4th the acreage of forest land. Given the very high regard with which Pennsylvania Bureau of Forestry management is held in professional forestry circles, this disparity suggests that Forest Service management of commercial logging on the ANF is not ecologically sound or sustainable. The FS should reevaluate the ASQ and set it at a level that is ecologically responsible and silviculturally realistic. (#329)

Response: One readily observable difference between the State Plan and the ANF LRMP are the differences in land base modeled acres. Although the State Plan identifies the total acreage of the state forests as approximately 2.2 million acres, the State Plan model used 876,533 acres for the timber production calculations, and the model projected a total harvest of approximately 83.2 MM BdFt Equivalents. The 55-60 MMBF harvest identified in the sample statement above only represents the sawtimber portion and fails to represent the pulp portion of the total

projected harvest in the State Plan. The ANF LRMP modeled acres are 408,428 and a projected harvest of approximately 54.1 MM BdFt Equivalents that includes pulp and sawtimber. Sawtimber on the ANF is larger than sawtimber in the surrounding four-county area, and larger yet than that in the rest of Pennsylvania. In addition, as noted on p. 3-338 of the FEIS, total volume per acre on the ANF is 2,762 cubic feet per acre compared with the 1,910 cubic feet per acre average for Pennsylvania. When these differences in landbase, volume measurements and standing volume are considered, the stated differences are much less.

A comparison between the ANF LRMP and the State Forest Plans strictly on the basis of harvest per acre would not be a valid comparison. A number of variables such as tree seedling development, inventory volumes per acre, site productivity, forest health considerations, habitat objectives, vegetation composition, operability, age distribution, topography, economics, and special public concerns, as well as, any other factors that would need to be evaluated and analyzed to make that comparison. We believe the ANF LRMP ASQ is set at a level that is ecologically responsible and silviculturally realistic.

Public Interest #127: The Forest Plan should change the suitability of Management Areas for timber production.

Sample Statement: I feel that the only areas that should not be considered for timber production are MA 6.3 Buzzard Swamp and MA 8.1 Wild & Scenic River. (#277)

Sample Statement: Standards should make particularly clear that vegetation management activities are prohibited in MAs 5.0 and 8.5. (#329)

Response: Management Areas suited and unsuited for regularly scheduled timber harvest, salvage harvest, or harvest to achieve other resource objectives are displayed in the LRMP (Table 10, p. 35). Those that exclude any type of harvest activity include wilderness (5.1), wilderness study (5.2), scenic areas (8.3), and the research natural area (8.5). Harvest activity is considered inconsistent with the desire for a relatively undisturbed and naturally evolving forest landscape and/or with the legislation that established the area. Some management areas provide for harvest when necessary to address recreation and scenery management objectives, user safety, plant and animal habitat needs, forest health, or natural catastrophic events. See the ROD (pp. 15-28) for the rationale for land allocation and the selection of Alternative Cm.

Public Interest #128: The Forest Plan should minimize timber harvesting for pulpwood.

Sample Statement: North America produces more than enough rice and wheat straw and other agricultural wastes to meet all its paper and building panel needs without having to supply the pulp and paper and chip wood industries with wood off of the ANF. The Allegheny FS needs to create a Plan that leads Pennsylvania in sustainability not continue unsustainable practices. (#295)

Response: We note your preference for not harvesting pulpwood. Timber sales on the ANF are normally integrated product sales, with high-quality, high-value sawtimber the primary product of interest. Pulpwood is a secondary lower valued product cut and harvested in order to meet silvicultural and other resource objectives. Pulpwood often must be removed in order to facilitate successful implementation of various reforestation practices. Demand for wood products continues to increase despite increased recycling and improved efficiency of wood production. Local demand for pulpwood has fluctuated since 1986, though demand for fuelwood is expected to increase during the next decade (FEIS pp. 3-111 to 3-114, 3-117 to 3-119, 3-385 to 3-386 and 3-397 to 3-398). In many cases, it is important to remove pulpwood to meet silvicultural objectives (LRMP Appendix A, pp. A-20, A-21, A-22 and A-24 to A-29). The LRMP 2400 Management Area Direction section provides specific guidelines regarding pulpwood designation and removal (LRMP pp. 104, 108 and 115). The anticipated pulpwood harvest amount for full LRMP implementation is shown in FEIS Table 3-110 (p. 3-413). For additional information, refer to the response to PI #134.

Public Interest #129: The Final EIS should include a departure schedule for a minimum of the first decade of the planning period to restore a healthy age balance to the Allegheny Hardwood forest type.

Sample Statement: The plan must include a departure schedule for no less than the first decade of implementation to address the declining condition of the Allegheny hardwoods across the ANF. According to Table 3-20 of the DEIS, nearly 70% of the forest is moderately to highly stocked with mature trees. From a management perspective two things can happen, either ignore the situation allowing the trees to grow old and die or harvest them while they are merchantable. The former inhibits sustainability while the latter promotes it. In terms of timber production, the schedule should be no less than the maximum departure (77 mmbf per year) reported in the THPC report in 1995. (#462)

Response: A departure schedule model was run and the results are displayed in Appendix B of the DEIS. The departure model was constrained to elevate harvest in the second and third decades. This model was determined not to meet future desired forest conditions and was not considered further (see ROD, Alternatives Considered But Eliminated From Detailed Study). We believe that the alternative models that were considered all provide for a sustainable forest. In addition, see response to comments PIs #122, 125 and 126.

Public Interest #130: The Final EIS should explain the reason for maximizing harvest in the first decade.

Sample Statement: The development of forest plan alternatives is to proceed from analysis on a number of fronts. In this case the most applicable are 1) analyzing what needs to change in the current forest plan; and 2) running a series of benchmarks that assess forest capability for timber management in order to determine the range of alternatives. In fact, the NFMA requires the use of benchmarks “to define the range within which alternatives can be constructed” (36 CFR 219.12 (e)(1). Five specific benchmarks were run (page B-37): - Maximize timber production in the first decade with no harvest constraints - Maximize PNV of the timber program with no harvest constraints - Maximize timber production in the first decade with NDY and LTSY harvest constraints - Maximize PNV of the timber program with NDY and LTSY harvest constraints - Minimize Timber Production First of all, please explain again the reason for maximizing harvest in the first decade. (#443)

Response: Maximizing timber production in decade 1 is the same as maximizing timber production in decades 1-15 when the harvest constraint of non-declining flow is present. The maximize timber production in the first decade with no harvest constraints establishes the basis for comparison with the maximize timber production in the first decade with NDY and LTSY harvest constraints. By comparing the benchmarks it is apparent that the constraints are functioning as expected with a non-declining flow. The NDY constraint prevents harvest levels in successive decades from being less than the harvest level in the preceding decades, and the LTSY constraint assures that the ASQ is less than or equal to the LTSY.

Public Interest #131: The Final EIS should include projections of the annual net growth of the Allegheny National Forest in terms of board feet and cubic feet.

Sample Statement: I see no data in your summaries showing the annual net growth of the ANF. Despite all the new environmental laws and regulations, we should be able to see what this ANF is capable of growing in board feet and cubic feet, biologically. I see a lot of discussion in Appendix B describing your analytical process but no simple statement that the ANF is growing X number of board feet. (#147)

Response: We have noted your concern, and we have added a table to Appendix B of the FEIS (Table B-37) that shows total growing stock and annual net growth on all of the ANF forested land. It also displays total growing stock and annual net growth on forest land suited for timber harvesting.

Public Interest #132: The Forest Plan should provide minimum rotation ages for timber harvest.

Sample Statement: The Forest Service does not provide minimum rotation ages in the PLRMP as they did in the 1986 Forest Plan. This is important because the minimum rotation age “corresponds with the point at which the stand has exceeded 95 percent of the Culmination of Mean Annual Increment of growth.” (#327)

Response: Minimum rotation ages are listed on p. 67 of the LRMP. As stated in the standard for rotation age, minimum rotation age corresponds with the point at which the stand has exceeded 95 percent of Culmination of Mean Annual Increment (CMAI) of growth.

Public Interest #133: The Final EIS should clarify the number of acres available for uneven-aged management

Sample Statement: The preferred alternative states harvest activities in all forest types of approximately 60% even, 25% uneven, 15% no vegetative management, pg. ES-8. Table ES-1, pg. ES-10, shows 283, 990 acres even, 2,826 acres uneven. If ratios are calculated using 355,818 acres of land suitable for timber production the results are 80% even, 8% uneven. If ratios are based on the total land area of 506,477 acres the results are 56% even, 6% uneven. (#161)

Sample Statement: I thought the idea of Alt. C was that the ANF was going to have more uneven aged management in timber harvesting. In the summary table (pg. ES-10) it shows Alt. C as having 2,826 acres in uneven-aged management. Yet on pg. ES-5, it says 25% of the ANF would be in MA's featuring uneven-aged methods. 25% would be 128,331 acres, not 2,826. Is that a typo? Did I misunderstand? I realize that not every acre of each MA would be managed but it seems like a large discrepancy. It looks like there will be even less uneven-aged mgt. in Alt. C than there is in the current plan. (#162)

Response: There was an error in the way this information was displayed in the PLRMP and DEIS. We have corrected this and as reflected in Table 2-3 of the FEIS (pp. 2-54 to 2-58), 33,700 acres of the ANF would feature predominantly uneven-aged management. This includes all of MA 2.1 and portions of MA 2.2. The 2,826 acres listed on page ES-10 for uneven-aged management only includes Management Area 2.1. MA 2.1 is described as “uneven-aged management” even though other management areas also would utilize some amount of uneven-aged management. MA 2.2 includes substantial areas where uneven-aged management would also be featured.

Since Table ES-1 is intended to be a summary, it does not contain sufficient detail for each Management Area to enable the reader to do this type of numerical validation. The percentages mentioned (Summary of the DEIS, p. ES-8) are based on a total land area of 506,500 acres. They are consistent with the acres shown in DEIS Table 2-3 for the subcategory entitled “Silvicultural Systems Used – Total acres allocated by dominant silvicultural system based on Management Areas”. In addition, between DEIS and FEIS we’ve clarified that MA 2.2 is intended to provide for a blend of management, including even-aged, uneven-aged and passive (no active) management. The updated figures in Table 2-3 in the FEIS reflect this adjustment.

Public Interest #134: The Allegheny National Forest should consider providing unmerchantable timber to local markets.

Sample Statement: Anything that used to be left in the woods (like the undesirable species, or small wood or tops of trees) has a market. Locally there are a few alternative markets for this unmerchantable timber. With this in mind, silviculturalists have yet another tool to use when they are making decisions. (#465)

Response: Timber sales on the ANF are normally integrated product sales, with wood products removed as necessary to meet silvicultural and landscape level objectives. Pulpwood is a lower valued product cut and removed in order to meet silvicultural and other resource objectives.

Material that is not merchantable as pulpwood is retained on site to meet other resource objectives. Fallen branches and slash left after timber harvest are very useful for recycling nutrients and organic matter back to the soil, in time becoming part of the soil. Together with the tree's leaves and roots, they contain roughly half of the nutrients stored in the tree. Larger unmerchantable stems decompose much more slowly and provide these benefits for a much longer time (FEIS p. 3-11). Tops of trees, if not too heavily concentrated so they restrict reforestation treatments, sometimes serve to temporarily protect developing tree seedlings from deer browsing. The LRMP provides a guideline for leaving slash from harvest operations where it is felled (LRMP p. 73). Down woody material is also an important component of late structural forest (FEIS p. 3-143 and 3-185).

Public Interest #135: The Forest Plan should include goals and objectives for energy production from low quality timber.

Sample Statement: The Forest Products section of the Plan should be amended to better recognize the potential demand of low quality timber for energy production. The Forest Service has made promotion of wood for biomass energy a strategic goal. On the state level, Pennsylvania has enacted an alternative energy portfolio standard which recognizes biomass, and has a number of on-going initiatives to promote private investment in biomass projects (electric and liquid fuel). Locally, the Kane Area School District has explored the use of biomass for school heating. (#268)

Response: Nothing in the LRMP would preclude the use of low quality timber products from the ANF for energy production. However, see response to PI #134 for a discussion on possible constraints to this activity and the response to PI #128 for a discussion on low value pulpwood products resulting from vegetation management activities on the ANF.

Public Interest #136: The Final EIS should detail how costs were calculated for harvest sale planning, preparation, and administration.

Sample Statement: We have additional questions about the data used to calculate costs. The Forest provided a total average cost for harvest sale planning, preparation and administration of \$233.32 per MBF (p. B-63). What is the breakdown for each of these three activities? Does the category of "sale preparation" include the costs for specialists to engage in necessary field survey and environmental effects analysis? If so, what percentage of the cost? What cost types are included in "sale administration"? Are any road construction or reconstruction costs included in any of the three areas above? (#443)

Response: Total cost for sale planning, preparation and administration (\$233.32 per MBF) was an estimate used in the DEIS and based on ANF Budget Line Items relative to planning, preparing and administering timber sales, and the average amount of timber sold and cut between 2001 and 2005, adjusted to 2005 dollars. The Forest Service does not maintain detailed accounting for each of these items. Using the \$233.32 per MBF as a reference of total costs, we estimated the separate cost for each of these three activities based on allocation of dollars associated with the ANF timber program (51% sale planning, 24% sale preparation, and 25% sale administration in Fiscal Year 2006). This includes all costs for various resource specialists to complete necessary field surveys and environmental analysis, as well as accomplish field layout (including necessary buffers) during sale preparation. The level of activities were then modified based upon the type of treatment and the forest type (e.g. second entry final removal cuts did not require the same amount of sale planning as the initial cut). These activities and their costs were then placed in the SPECTRUM model for the FEIS analysis of all alternatives. For further information on the economic analysis, see pp. B-81 to B-95 of Appendix B of the FEIS.

Road costs are not included in these costs. See pp. B-91 and B-92 of Appendix B of the FEIS for a discussion of road costs.

Public Interest #137: The Allegheny National Forest should reconsider the Utilization Standards for timber harvest as displayed in Table III-7 of the PLRMP.

Sample Statement: Table III-7: Utilization Standards. I believe there needs to be some changes made to the explanations here. I think the table is set up to try and separate sawtimber and pulpwood products based on the line weights observed in the Table. It should be clarified, however you choose to do it that Footnote 1, “plus trim allowance”, pertains only to sawtimber and not to pulpwood as well. Perhaps a heavy line weight can separate the pulpwood and sawtimber products. Footnote 2 should be re-worded to state: “Trees meeting minimum Tree and Piece Specifications of 11.0 inches DBH shall be considered as sawlogs”. The Forest does sell sawlogs that do not necessarily meet Factory Lumber Log grade 3 or better as indicated in the footnote, especially blow down salvage timber. These are referred to as Local Use or Construction Grade logs, if they don't grade out as Grade 3 or better. The objective here is to not suggest that if a tree doesn't contain one sawlog of Grade 3 or better that it isn't a sawlog and therefore constitutes pulpwood. It isn't true. The Forest also doesn't grade all sawtimber; grading is used intermittently and primarily for black cherry, and as an objective indicator of product quality for timber appraisal purposes. Footnote 6: recommend deleting the reference that aspen should only be cruised as pulpwood; industry needs could change, and aspen could be cruised as sawtimber if a market developed. Furthermore, under this footnote, drop the wording that this timber will only be sold as Timber Subject to Agreement. The Forest has had no problem including Aspen pulpwood in the mixed hardwood pulpwood sold on normal commercial timber sales. Timber Subject to Agreement means that the Forest might not be credited with that volume, for reporting purposes, and it should be. (#215)

Response: Table 23 (LRMP p. 72) has been modified, taking into account your suggestions.

3.6.3 Harvest Methods

Even-Aged Management

Public Interest #138: The Final EIS should describe the effects of even-aged management.

Sample Statement: The overwhelming use of even-aged logging has caused extensive damage to biodiversity and recreation across the Allegheny National Forest. The Forest Service wants to continue with the tree farming of black cherry trees across the Allegheny. The Forest Service is attempting to look the other way at these problems while re-defining “clearcutting” to make it appear that they have stopped the practice when in fact nothing has changed. (#295)

Response: Many silvicultural practices are implemented to help establish a variety of tree species, not just black cherry (FEIS pp. 3-119 to 3-131, 3-145 to 3-147 and 3-155 to 3-159; LRMP Appendix A, pp. A-29 to A-32). The effects of even-aged management on vegetation are described in the FEIS section 3.3.1 Forest Vegetation, Direct and Indirect Effects, Effects Common to All Alternatives (FEIS pp. 3-110 to 3-114). Cumulative effects on forest vegetation for each FEIS Alternative are discussed in the cumulative effects section (FEIS pp. 3-166 to 3-179). Direct, indirect, and cumulative effects of even-aged management on other elements of the environment (i.e. water, soils, plant and animal habitat) are discussed in other sections of the FEIS Chapter 3. In addition, see response to PI #140.

Public Interest #139: The Allegheny National Forest should stop using even-aged timber management.

Sample Statement: The timber industry, pulp and paper, wood chip and now bio-fuels industries have no right to think it can depend on Pennsylvania's only national forest as a replacement source for its resources created by the mismanagement, over-cutting and sale of its industry forestlands or privately owned forestlands in Pennsylvania. Forest sustainability in Pennsylvania hinges on the 14 million acres of privately held forestlands. Pennsylvania mimics the northeast where 76% of forestland is privately held...The ANF Forest

Service needs to end its even-age management program supplying these industries with virgin pulp and chip wood. (#295).

Response: Pages 1-6 to 1-20 of the FEIS describe the significant issues that were used to develop the Alternatives described in Chapter 2 of the FEIS. Silvicultural systems to be applied on the ANF were recognized as an important issue and were included as component 4 of the forest vegetation management issue. The significant issues were used to develop the Alternatives that define desired conditions, land allocations to various Management Areas, and blend of activities, outputs, and forest settings that would be provided on the ANF. Silvicultural treatments, both even and uneven-aged, and large areas of no active management, are featured in all Alternatives to varying degrees, in order to achieve desired landscape level forest vegetation conditions for each Alternative. See also pp. 15 to 28, particularly pp. 25-26, of the Record of Decision for rationale on the selection of Alternative Cm and the blend of even and uneven-aged management that would be featured.

Table 21 on p. 66 of the LRMP (Harvest Cutting Methods on the ANF by Forest Type and Management Area) displays the silvicultural systems that are permitted within each Management Area. As noted in forestwide design criteria for forest vegetation (2400), decisions about specific harvest methods and silvicultural systems will be made at the project level within the context of Management Area direction (see LRMP, p. 64).

Appendix A to the LRMP describes the scientific rationale for choice of Vegetation Management Practices to be used on the ANF. This appendix includes sections on integrated pest management, rationale for prescriptions in forest types found on the ANF, and final selection of silvicultural system. The decision to use even-aged or uneven-aged management is based on a number of factors, including forest health considerations, land management objectives (generally driven by Management Area desired vegetative conditions, goals, and objectives), growth and regeneration requirements of tree species comprising the forest types being managed, and overall condition of the treated area.

In addition, see responses to PIs #123 and 147.

Public Interest #140: The Forest Plan should prohibit clearcutting.

TO PROTECT HABITAT DIVERSITY

Sample Statement: It is important to eliminate clear-cutting, so that the Forest Service improves native forest diversity. While it may be possible to use the Allegheny National Forest for some modest timber sales of black cherry, the current plan allows far too much clear cutting. Forest diversity is extremely important for animal life. It is also important for the recreational industry that is a critical part of the area's economy. (#153)

TO PROTECT WATERSHEDS

Sample Statement: You should know clearcuts are too destructive of forest hydrological integrity to any longer be regarded as acceptable forest practice - on fragile roaded watersheds with destabilized stream channels especially. ...The ten year reduction in canopy will result in the channel immediately below having to carry over 2x the annual flow it has in the last 80 years. The channel adjusts with bank and bottom scour and headcutting; all of which generate gravel and rubble that must be carried, often as a sediment wave, through the channel below - with cascading magnifying effect as bars deflect flow into the bank with tree-topple, out of bank flooding with its split channels, etc. all far off-site. (#20)

TO AVOID EXACERBATING THE IMPACTS OF ACID DEPOSITION

Sample Statement: The ANF's current dependence on clear-cut commercial / industrial logging only exacerbates the impacts of acid rain and ground level ozone on soil and water acidity and plant growth. - Clear-cut logging simply exhausts the buffering agents in the soil. (#295)

Response: Clearcutting is only permitted on the ANF in very limited situations. Forestwide standards provide very specific direction for when clearcutting may be applied on the ANF, and it must be considered to be the optimal regeneration method for it to be utilized (see Part 3 Design Criteria, section 2400 Vegetation, clearcutting standards on p. 68 of the LRMP and Appendix A to the LRMP, optimality discussion for each forest type on pp. A-8, A-9, A-10, A-12, A-15, A-16 and A-17 and description of clearcut with reserves on p. A-21).

As noted on p. 3-112 of the FEIS, in nearly all cases, areas managed using even-aged silvicultural systems retain trees that serve as biological and structural legacies of the stand over the long term.

Table 21 on p. 66 of the LRMP (Harvest Cutting Methods on the ANF by Forest Type and Management Area) displays the silvicultural systems that are permitted within each Management Area. As noted in forestwide design criteria for vegetation (2400), decisions about specific harvest methods and silvicultural systems will be made at the project level within the context of Management Area direction (see LRMP p. 64).

Clearcutting is not commonly applied on the ANF, particularly in planned regeneration harvests. The vast majority of areas regenerated in the past twenty years on the ANF through even-aged methods were regenerated using a shelterwood seed cut followed by a removal cut as opposed to a clearcut (USDA-FS 2004c, Appendix A). Most recent use of clearcutting as a regeneration method has been in response to tree mortality and subsequent salvage. The effects of even-aged regeneration (including clearcutting) and other forest vegetation treatments on forest vegetation are described on pp. 3-110 to 3-114 and pp. 3-131 to 3-179 of the FEIS. The effects of even-aged regeneration (including clearcutting) and other forest vegetation treatments are discussed for soil resources (pp. 3-10 to 3-21), water resources (pp. 3-30 to 3-51), air resources (pp. 3-57 and 3-60 to 3-63), plant and animal habitats (pp. 3-212 to 3-289), non-native invasive plant species (pp. 3-291 to 295), recreation opportunities and forest settings (pp. 3-313 to 3-314 and 3-326 to 3-328), scenery management and scenic integrity (pp. 3-373 to 3-380), heritage resources (pp. 3-381 to 3-384), forest products (pp. 3-393 to 3-399), economics (pp. 3-410 to 3-419), social conditions (pp. 3-434 to 3-443), and resource commitments (pp. 3-442 to 3-447) of the FEIS.

See pp. 15 and 25-26 of the Record of Decision for the rationale on the selection of Alternative Cm and the blend of even and uneven-aged management that would be featured.

In addition, see response to PIs #62, 167, and 168.

Public Interest #141: The Forest Plan should prohibit even-aged management in MAs 2.1, 2.2, 6.1, 7.2, and 8.3.

Sample Statement: Standards should be established that prohibit even-aged management in MAs 2.1, 2.2, 6.1, 7.2 and 8.3. Even-aged management promotes a simplified forest structure that is incompatible with the stated ecological and environmental purposes of establishing these MAs. (#329)

Response: The LRMP (Table 10, p. 35) designates Management Areas 7.2 and 8.3 as unsuited for scheduled timber harvest, while Management Areas 2.1, 2.2, and 6.1 are suited for such harvest. Even-aged management is appropriate in Management Area 2.1 in the aspen forest type due to the silvicultural requirements of aspen (LRMP Table 21, p. 66 and Appendix A of the LRMP, Table A-1, pp. A-6 to A-7 and p. A-8). Even-aged management (single and two-aged) is appropriate in MA 2.2 in aspen, oak, Allegheny, upland and northern hardwoods, and conifer forest types consistent with achieving the desired conditions and objectives of this MA (see LRMP Table 21, p. 66). Objectives for MA 2.2 include sustaining mid to late structural habitat on 85% of the

forested area, and early structural habitat (0-20 years old) in the oak type on 4 to 6 percent and in non-oak types on 2 to 4 percent of the MA (LRMP p. 109). Management Area 6.1 provides for using both even-aged and uneven-aged management (see LRMP Table 21, p. 66), with an objective to sustain 6 to 7 percent early structural habitat in the MA (LRMP p. 126). Uneven-aged silviculture may be used to manage shade tolerant forest types that are not declining from non-native insects and diseases, whereas even-aged silviculture would be used to meet the early structural vegetation objectives, primarily to sustain forest types dominated by shade tolerant tree species (LRMP, Management Area Direction, MA 6.1, 2400 Vegetation Management section, p. 128).

Public Interest #142: The Forest Plan should permit even-aged management in MAs 2.2, 6.1, 6.3, 8.1, 8.2 and 8.6.

Sample Statement: Allow for even-aged management in Management areas 2.2, 6.1, 6.3, 8.1, 8.2, and 8.6. (#452)

Response: MAs 2.2 and 6.1 do permit the use of even-aged management (see response to PI #141). MAs 6.3, 8.1, and 8.6 are not considered suitable for scheduled timber production, although silvicultural activities may be applied in these MAs under circumstances described in the MA description. MAs 5.1, 5.2, 8.3 and 8.5 are not considered suitable for scheduled timber production or salvage. As noted in forestwide design criteria for the 2400 forest vegetation section (LRMP p. 64), decisions about specific harvest methods and silvicultural systems will be made at the project level within the context of Management Area direction.

In addition, see response to PIs #141, 144, 148, and 151.

Public Interest #143: The Allegheny National Forest should limit shelterwood and clearcutting to areas best suited for black cherry production.

Sample Statement: Limit shelterwood/clear cut areas to those which best grow black cherry. Only this species is high enough in economic value to justify clear-cut and widespread herbicide application. (#127)

Response: Shelterwood and clearcut techniques are valid harvest methods to consider in a number of forest types, including Allegheny hardwoods where black cherry is often the dominant tree species (LRMP, Table 21, p. 66). Economics is only one of a number of criteria considered when determining which silvicultural system or harvest method is appropriate on a given site. Tree species growth requirements, insect & disease damage, wind damage, wildlife habitat objectives, site characteristics, and management area direction also play a strong role (LRMP, p. 68, Part 4 Management Area Direction pp. 101-168). LRMP, Appendix A provides the rationale and scientific basis for selecting harvest methods and reforestation techniques (including herbicides) for forest types on the ANF (LRMP, pp. A-4 to A-41). Appendix B of the FEIS (pp. B-85 to B-92) discusses the economics of different forest types.

Public Interest #144: The Forest Plan should focus even-aged management on stands that exceed financial maturity.

Sample Statement: Given that uneven-aged management typically costs more, the ANF needs to allocate funds and resources accordingly. Much of the funding can arise from a better application of even-aged management on a portion of the Allegheny Hardwood sites where stands are beginning to exceed financial maturity and do not contribute to core or corridor areas. For example, such areas may be proximate to oil, gas and mineral development. Increased harvesting of these stands for wood products can help fund appropriate management and regeneration techniques for forest types that desperately need attention. (#95)

Response: The type of harvest used takes into account many resource management considerations including site conditions, management area objectives, economics, tree species silvicultural requirements, forest health, wildlife habitat needs and recreation uses. For a particular site, the final selection occurs at the project level during Forest Plan implementation. The Forest Service currently has the authority to use money collected from the sale of

timber to help fund approved reforestation treatments within the timber sale area. The LRMP does not preclude harvest selection in areas based in part on the stated suggestions.

Public Interest #145: The Allegheny National Forest should cease all thinning operations.

Sample Statement: I oppose all thinning. (#44)

Response: Thinning is an intermediate cut (part of the even-aged management system) designed to enhance the growth and quality of trees, tree species diversity, tree size, tree seed production, forest health and habitat for certain wildlife species (LRMP Appendix A, pp. A-22 to A-30; FEIS pp. 3-114, 3-148, 3-214, 3-234 and 3-240). The estimated amount of thinning by Alternative is shown in FEIS Table 2-3, p. 2-55 for the first two decades and in Table 3-34, p. 3-158 for the first six decades.

Public Interest #146: The Allegheny National Forest should not conduct thinning operations for the sole purpose of increasing the monetary value of a stand.

Sample Statement: Management Area 3.0, the MA with the most land dedicated to timber production, states as an objective the removal of “low valued trees that compete with the potential crop trees.”...The objective to remove low valued trees that compete with potential crop trees violates the diversity requirement of NFMA. While the statute does provide discretion, that discretion cannot be interpreted to allow an objective to deliberately decrease tree species diversity in order to promote only high value Allegheny hardwoods, particularly black cherry. This is precisely what is happening, as evidenced by the DEIS: “current overstory species distribution is not being maintained for forest types other than Allegheny hardwood.” (#327)

Response: Intermediate thinnings are designed to reduce stocking in highly stocked stands in order to enhance residual tree survival or to concentrate growth on the best trees, as well as harvest trees which are of poor quality or at risk of dying during the next 5 to 10 years (see FEIS p. 3-114). Forestwide guidelines in the 2400 vegetation section of the LRMP (p. 65) state that in intermediate cuttings, good quality seed trees of diverse species representative of the existing stand and desired in the next stand should be retained, and seed sources of scarce species should be preserved. The objective for pre-commercial thinning and release in MA 3.0 has been modified to remove the words “low value” (see p. 113 of the LRMP and also forestwide guidelines on p. 67 of the LRMP).

See PI #211 for more information on the LRMP strategy to maintain tree species diversity.

Uneven-Aged Management

Public Interest #147: The Allegheny National Forest should emphasize uneven-aged management to benefit aesthetics, biodiversity, and forest health.

Sample Statement: Uneven-aged stands are the most visually appealing they create a more natural looking scenic view, whereas even-aged stands create a man-made tree-farm look. Uneven-aged stands are also more appealing to a variety of wildlife and insect species they provide low-lying saplings as cover for small mammals and older dead and dying trees for cavity nesters. The truly natural environment contains a variety of species and ages, and the ANF would benefit the most from imitating such a scenario. (#431)

Sample Statement: If late-successional forests were well represented on Allegheny National Forest, the USDA Forest Service may have an opportunity to unravel the complexities of the pests and pathogens that threaten these forests, finding ways to combat or coexist with such threats. The survival of our native forests of the Northeast may well depend upon the lessons we can learn from managing for late-successional and mature forest types on Allegheny National Forest (#331)

Sample Statement: Eighty two percent of the Allegheny National Forest is currently managed through even-aged methods. Alternative C and D would decrease these percentages to 60 and 31%, respectively. The increased tree species diversity resulting from the decrease in even-aged management proposed under

Alternatives D and C can mitigate the devastating effects of non-native invasive forest insects with narrow host ranges, such as emerald ash borer, beech scale (and their associated *Nectria* fungi), elongated hemlock scale and hemlock woolly adelgid. It can also reduce the impact of gypsy moth, which has a broad host range but highly prefers oak. Increasing uneven-aged management under Alternative D can benefit shade-tolerant species like hemlock and other trees in the northern hardwood habitat type in the ANF. Hemlock woolly adelgid will likely reach the ANF within the next decade, so some are concerned about management options that will promote hemlock. Although this insect poses a very serious threat to forest health, it does not necessarily mean that *Tsuga canadensis* will be lost from the landscape. HWA has been present in some areas of eastern southern and central Pennsylvania for over 30 years...Negative impacts of native insect defoliators can be mitigated by maximizing tree species and age diversity through increasing uneven-aged management proposed in Alternative D. Native beneficial insect biodiversity may also be enhanced under increasing the amount of uneven-aged managed forest under Alternative D. Uneven-aged managed forests have greater ground-dwelling beetle species richness, abundance and diversity when compared with even-aged forests (Werner and Raffa 2000). Many other studies have found species composition changes in response to even-aged management, including a loss of forest specialists. (#430)

Response: We agree that a variety of forest management regimes helps conserve biodiversity at a regional scale, as concluded by Werner and Raffa (2000). Alternative Cm will achieve this by sustaining a diversity of tree species and age classes across the ANF landscape through a blend of even-aged, uneven-aged and passive (no active) management (see pp. 3-110, 3-126 to 3-131, 3-131 to 3-161 and 3-166 to 3-179 of Chapter 3 of the FEIS, forest vegetation, environmental consequences). It should be noted that the acreages allocated to even-aged silvicultural systems, uneven-aged, and passive (no active) management displayed in Table 2-3, p. 2-55 of the FEIS reflect the predominant silvicultural system (including no active management) that would be featured on those acres. Areas that feature even-aged silvicultural systems would eventually consist of a mosaic of forest age classes, from old to young across the landscape. Areas managed using uneven-aged systems would contain multi-aged stands with predominantly continuous high forest canopy. Areas not actively managed would continue to mature and provide older structural conditions over time. Taken as a whole across the ANF, a mosaic of predominantly mature and older forest vegetation would exist, comprised of a diversity of tree species and forest types, with inclusions of younger and mid-structural ages interspersed.

We concur that a high occurrence of any single tree species can increase the threat of tree mortality from insects or diseases. Thus, forestwide goals for vegetation (see LRMP p. 14) include providing a diversity of vegetation patterns across the landscape, a range of forest age classes and vegetative stages, a variety of healthy functioning vegetation layers, moderate to well stocked forest cover, and the variety of vegetation species or forest types necessary to achieve multiple resource objectives and sustain ecosystem health.

Cores areas of continuous, older forest habitat would be conserved in all Alternatives. In addition, in order to provide connectivity and late structural vegetation between core areas, MA 2.2 would be added in Alternatives B, Cm, and D. Pages 3-140 to 3-144 of the FEIS describe vegetation characteristics of areas allocated to provide late structural or old growth vegetation up to 6 decades from now.

We agree that increasing uneven-aged management under Alternative D would feature shade-tolerant species like American beech, eastern hemlock, and sugar maple. However, all of these are subject to serious forest health concerns on the ANF (see also response to PI #148 and 151). We anticipate the effects of beech bark disease complex (including beech scale) to be worse in unmanaged, older areas (see FEIS pp. 3-126 to 3-131 and 3-164 to 3-166), where no action is taken to reduce the number of susceptible beech trees, in order to feature healthier trees (including beech trees resistant to the scale and disease complex). We agree that mortality rates from HWA observed elsewhere in the eastern United States vary considerably, and uncertainty exists with regard to how much hemlock might succumb to this introduced insect here on the ANF (see FEIS p. 3-175). The effects of uneven-aged management on various resources, including wildlife habitat, scenic quality, and others are described throughout the environmental consequences sections within individual resource sections in Chapter 3 of the FEIS.

See pp. 15-28, particularly pp. 25-26, of the Record of Decision for the rationale on the selection of Alternative Cm and the blend of even and uneven-aged management that would be featured.

In addition, see response to PIs #139, 148 and 149.

Public Interest #148: The Allegheny National Forest should reduce the amount of uneven-aged management and use even-aged management instead to improve regeneration success and to enhance biodiversity.

Sample Statement: Forests in Pennsylvania, especially the Allegheny National Forest, face many impacts that hinder forest regeneration, the fundamental component of sustainable forest resource management. Insects, diseases, invasive plants, overpopulations of white-tailed deer and soil conditions are all impacts that require specific, flexible management practices to overcome. Even-aged forest management is often the most effective system to promote desirable regeneration, balance age classes across the forest, manage harvesting activities and enhance biodiversity. We caution the ANF on too heavily relying on uneven-aged silviculture to achieve plan goals. We encourage the monitoring of silvicultural treatments to ensure successful forest regeneration, making adaptations when necessary. (#246)

Sample Statement: Uneven-Aged management - While I believe the intent is good to implement UEAM, I do not recall ever having seen on any tours I've been on within the ANF any stands with UEAM successfully implemented, as a "success story"...I'm more inclined to see the amount of acreage represented as a percentage, reduced from 25% to 10%. Additionally, I do not see much recent (within the last 5 years) research that strongly supports implementation of UEAM on the Allegheny plateau. (#215)

Sample Statement: The Allegheny Hardwood type is unique to the whole world and needs to be actively managed using even-age silvicultural tools (herbicide, fencing, DMAP, fire, etc.) to be perpetuated for future generations. This is an extremely valuable asset to our local area and must not be lost through lack of proper forest management. Uneven-aged management is proposed on 2,826 acres. The effectiveness of this allocation is not supported by research. We need to stick with what has been proven as an effective management tool in our local even-aged forest types, even-aged management. (#452)

Response: We have refined figures for the amount of the ANF where even-aged, uneven-aged and passive (no active) management would be featured as shown in Table 2-3, p. 2-55 of Chapter 2 of the FEIS. Specifically, we adjusted these figures to match the text description for MA 2.2 (see LRMP, Management Area 2.2, 2400 Vegetation Management, guidelines, p. 111). MA 2.2 features a blend of uneven-aged, even-aged and passive (no active) management, which is now reflected in the corrected figures in Table 2-3. This clarification results in Alternative Cm allocating 7 percent of the ANF to feature the use of uneven-aged management.

Both even-aged and uneven-aged regeneration methods are viable choices on the ANF. Uneven-aged management would occur primarily in Management Areas 2.1 and 2.2 to achieve structural characteristics and maintain generally continuous high forest canopy for wildlife. It may also be used in some management areas in riparian zones or where necessary to help meet Scenic Integrity Objectives (LRMP, Table 21, p. 66 and 2400 standards and guidelines in Part 4, pp. 101-168). The environmental consequences section of Forest Vegetation in Chapter 3 of the FEIS acknowledges differences in forest vegetation outcomes associated with even-aged, uneven-aged and passive (no active) management- specifically a shift towards more shade-tolerant species is projected when uneven-aged silvicultural systems are used (see pp. 3-114 to 3-119 of the FEIS and Appendix A to the LRMP, pp. A-9 to A-18 and pp. A-23 to A-28). Pages 3-110 to 3-119 of the FEIS discuss the effects of uneven-aged and even-aged management on forest vegetation, including forest structure and composition (tree species and forest types). These effects are incorporated into the forest composition (forest types) outcomes displayed on pp. 3-132 to 3-135 of the FEIS.

In addition, the FEIS and Appendix A to the LRMP acknowledge the limited success with applying uneven-aged management (single tree selection and group selection with groups less than one-half acre) in the past on the ANF

and the uncertainty associated with it (see pp. 3-115 and 3-116 of the FEIS and p. A-2 and pp. A-23 to A-26 of Appendix A to the LRMP). To address these concerns, guidelines for the use of uneven-aged management in the LRMP allow for larger group sizes (up to 3 acres), based on the forest type being managed (see LRMP, Design Criteria, section 2400 Vegetation, uneven-aged management, pp. 68-69 and Appendix A to the LRMP, pp. A-24 and A-25). This is in order to increase the success of uneven-aged management, increase the species diversity and range of shade-tolerance levels of tree seedlings in treated areas, and reduce the level of forest health concerns associated uneven-aged management that features solely shade-tolerant species (which are subject to serious forest health concerns on the ANF).

Uneven-aged treatments on the ANF will be closely monitored for their effectiveness in terms of stocking levels, species composition, seedling establishment time, cost and effectiveness in obtaining species diversity and sustaining forest types, particularly with regard to the various opening sizes under uneven-aged management (see LRMP, monitoring plan, Table 15, p. 50).

Pages 15 to 28, particularly pp. 25-26, of the Record of Decision include rationale for selection of the preferred Alternative, including the blend of silvicultural systems that would be featured in the LRMP.

In addition, see response to PIs #150 and 151.

Public Interest #149: The Final EIS should explain why increased uneven-aged management will be used when northern hardwoods are projected to decline.

Sample Statement: This plan is proposing to increase uneven-aged management from less than 1% to 25% of the management on the forest. This management technique has not been proven to be successful in regenerating this forest and will be an experiment. This uneven-aged management will be more costly to implement and will be a detriment to the sustainability of the Allegheny Hardwoods forest type. This uneven-aged management favors the Northern Hardwood forest type at the expense of the Allegheny Hardwoods. A real concern here is that the ANF admits that northern hardwoods will decline due to serious forest health concerns from being under attack by insect and disease. (#132)

Sample Statement: The plan must reassess the increased use of uneven-aged management. Committing 25% of manageable harvest to uneven-aged silviculture (up from less than 1%) is an experiment designed essentially to promote Northern hardwoods and has no support from the forest professional community. The technique has proven unsuccessful in regenerating Allegheny Hardwoods, is highly intrusive and will be far more costly if ever it is to achieve the desired condition. More fencing, herbicide use and increased road construction are but a few of the circumstances necessary to achieve even marginal success. (#462)

Response: The environmental consequences section of Forest Vegetation in Chapter 3 of the FEIS acknowledges differences in forest vegetation outcomes associated with even-aged, uneven-aged and passive (no active) management- specifically a shift towards more shade-tolerant species when uneven-aged silvicultural systems are used (see pp. 3-114 to 3-119, 3-126 to 3-131 and 3-132 to 3-135 of the FEIS and Appendix A to the LRMP, pp. A-23 to A-28).

We recognize the forest health risks associated with shade-tolerant tree species (American beech, eastern hemlock, and sugar maple) comprising the northern hardwood type on the ANF. Thus, we have included the acreage of northern hardwoods and hemlock forest types in each of the Alternatives as a measure of the effect of each Alternative on overall forest health (see p. 3-148 of the FEIS).

In addition, see response to PIs #148 and 151.

Public Interest #150: The Allegheny National Forest should consider the additional costs of uneven-aged management.

Sample Statement: Reports indicate that uneven-aged management is more costly and more intrusive than even-aged management. Additionally, even-aged management allows for higher retention of Allegheny Hardwoods, which are the most profitable species for timber harvesting in the Allegheny National Forest. Therefore, the preferred alternative must emphasize even-aged management to the greatest extent possible in order to cut costs and ensure the proliferation of the most profitable tree species in the Allegheny National Forest. Alternative A proposes a much higher level of even-aged management than alternative C, and it also de-emphasizes uneven-aged management to a greater extent than alternative C...Moreover, research has shown that, given high deer densities on the Allegheny National Forest, it is simply not possible to implement an uneven-aged management system. Therefore, the Proposed Plan must be rescinded and revised so that uneven-aged management is excluded as a forest management strategy to the greatest extent possible. (#484)

Response: We agree that uneven-aged management is more costly and intensive than even-aged regeneration methods. It was assumed the same level of reforestation investments would occur with uneven-aged management as even-aged management. Under an uneven-aged system, a number of harvest entries are required, with the objective of developing tree seedlings with every entry (see p. 3-114 to 3-115 of Chapter 3 in the FEIS and p. A-23 of Appendix A to the LRMP). Thus, reforestation investments are required several times over the course of transitioning present-day even-aged forest stands to an uneven-aged stand. Reforestation costs were estimated for both even-and uneven-aged management and are reflected in Appendix B (Economic Efficiency and Impact Analyses section) of the FEIS.

Page 3-154 of the FEIS discusses the effects of deer browsing impacts on ANF understory vegetation, poor success rates associated with past uneven-aged management efforts, and acknowledges uncertainty associated with future deer browsing impacts on the ANF. Historically high deer populations on the Allegheny Plateau have severely limited the potential for successful application of uneven-aged management on the ANF. However, as noted on p. 3-154 of the FEIS:

“Deer browsing impacts on seedling regeneration in the past has reduced the potential successfulness of uneven-aged regeneration methods. In recent years, however, browsing intensity has decreased on the ANF as a result of implementation of new deer management options created by the Pennsylvania Game Commission, but understory response lags behind the deer population drop (deCalesta 2005). If current programs remain in effect, it is possible that one of the most important challenges to regeneration success on the ANF will be eased during the implementation period for this plan, but it is also possible that deer impacts will return to historic and challenging levels. A future with reduced deer impact may reduce the need for fencing and some of the barriers to successful implementation of uneven-aged silviculture.”

In addition, see response to PI #148.

Public Interest #151: The Forest Plan should not refer to 1 to 3 acre cuts as group selections.

Sample Statement: Regarding group selection in uneven-aged management, we support the suggestion made by Eric Zenner (EMAC, June 2006) to retain consistency with current silviculture terminology for uneven-aged management practices. Specifically, proposed 1-3 acre cuts in Allegheny hardwoods and Oak hardwood are inconsistent with the current SAF group selection definition of, “...maximum width of groups is approximately twice the height of the mature trees.” Although there are regeneration and habitat utilities in the larger 1-3 acre units, they should not be referred to as “group selections”. (#87)

Response: Though inconsistent with the SAF group selection definition, our definition of uneven-aged management is consistent with the definition for uneven-aged management listed in the regulations (36 CFR 219.3) implementing the National Forest Management Act as follows:

“Uneven-aged management: The application of a combination of actions needed to simultaneously maintain high forest cover, recurring regeneration of desirable species, and the orderly growth and development of trees through a range of diameter or age classes...Cutting is usually regulated by specifying the number or proportion of trees of particular sizes to regain within each area, thereby maintaining a planned distribution of size classes. Cutting methods that develop and maintain uneven-aged stands are single-tree and group selection.” (36 CFR 219.3)

Some definitions exist for group selection sizes based on the height of mature trees, while other definitions focus on the area or size of openings. Both Appendix A to the LRMP (pp. A-9, A-11, A-13 and A-15 to A-18 and uneven-aged and group selection discussion pp. A-23 to A-26) and the forest vegetation section of the FEIS (see 3.3.1 Forest Vegetation section, pp. 3-114 to 3-119) provide background information on the use of uneven-aged management on the ANF, and rationale for the use of various group sizes with the uneven-aged regeneration method.

As discussed on pp. 3-116 of the FEIS and pp. A-2 and A-24 of Appendix A of the LRMP, past results with even-aged regeneration have been quite good on the ANF. Conversely, poor success and uncertainty with tree seedling regeneration has been associated with uneven-aged management on the ANF (USDA-FS 1998, pp. 18 and 86; USDA-FS 2001d pp.16, 17, 76, 77; USDA-FS 2002, p. 23; Stout 1994, pp. 333-334) under the 1986 Forest Plan, which limited group selection openings to less than ½ acre (USDA-FS 1986b, p. D-2). American beech (susceptible to beech bark disease complex), sugar maple (limited by site-nutrient characteristics and currently subject to decline on the Allegheny Plateau), and eastern hemlock (threatened by the looming introduced hemlock woolly adelgid) are the three species that are tolerant of shade and would best regenerate and survive in much of the group opening when smaller openings are used. Given this, uneven-aged management on the ANF will strive to sustain a diversity of tree species, including a range of shade-tolerance levels.

Appendix A of the LRMP acknowledges that differences in recommendations for group sizes exist. To develop the new group selection guidelines for use on the ANF, we reviewed a host of scientific literature on the seedling regeneration response obtained through the use of various group selection opening sizes, from 0.4 acres up to 3 acres in size (see pp. A-24 to A-25 of Appendix A of the LRMP). In general, the wider the opening, the greater the potential is for establishment and growth of the less shade-tolerant species as part of the new cohort (Nyland 2003; Dale et al. 1995; Kelty et al. 2003). Larger opening sizes are projected to increase the successfulness of uneven-aged management on the ANF by making additional sunlight and resources available for seedling establishment and growth. Larger group sizes would better maintain tree species diversity, including a component of species that comprise many dominant forest types present on the ANF today that are not tolerant to intermediately tolerant of shade. This would reduce the forest health risk associated with applying silvicultural systems on the ANF that strictly favor shade-tolerant species.

The group sizes detailed on p. 69 of the LRMP and p. A-24 of Appendix A to the LRMP are driven by the overall objective of sustaining existing forest types and regenerating a diversity of tree species with varying shade tolerance levels, and are based on the regeneration and growth requirements of the dominant tree species that comprise various forest types present on the ANF. The 1 to 3 acre group opening sizes would be used in forest types dominated by the tree species that are not tolerant of shade (Allegheny hardwood and oaks). The other major forest types would utilize smaller group opening sizes (0.5 to 2 acres).

Uneven-aged treatments will be monitored for their effectiveness in terms of stocking levels, species composition, seedling establishment time, cost and effectiveness in obtaining species diversity and sustaining forest types, particularly with regard to the various opening sizes under uneven-aged management (see LRMP, monitoring plan, Table 15, p. 50). Actual group opening sizes and locations will be determined at the project level and driven by vegetation management objectives, presence of advanced seedling regeneration, and predominant tree species comprising the forest type being treated.

In addition, see response to PI #148.

Salvage Harvest

Public Interest #152: The Allegheny National Forest should salvage timber in a timely manner.

Sample Statement: The Forest should consider trade-offs or adjustments to its green program to focus on and facilitate the rapid and timely recovery of dead, dying, and damaged timber as the result of catastrophic events, such as wind throw, insect and disease, and drought, or the cumulative effects thereof. This generally means that the timber should be sold and recovered within two years of the event, in order to preserve as much of the economic value of the timber as possible especially for white wood species such as maple, ash, and beech which deteriorate rapidly. In the last two decades, the Forest has addressed four such catastrophic events and the time frames have become longer and longer to address the salvage of effected timber (litigation notwithstanding) to the point that several million dollars worth of timber value have been forgone. (#215)

Response: ANF personnel recognize the importance of responding in a timely fashion to natural catastrophic events. The appropriate response to individual events is determined at the project level given the management area direction, the nature of the event, anticipated future impacts, and other resource considerations. Note there is a LRMP objective (LRMP p. 19) for Management Areas 1.0, 2.2, and 3.0 to utilize salvage sales within two years of the event to achieve multiple use objectives and recover timber value. Salvage considered for other areas would be consistent with the suitability of the area for timber harvest or salvage (LRMP Table 10, p. 35) as well as the LRMP 2400 management area direction for each management area. Opportunities to refocus the ANF annual program of work toward salvage opportunities would be explored once details are available regarding the nature of the event.

Public Interest #153: The Allegheny National Forest should make timber salvage decisions based on forest ecosystem health rather than on the value of the salvaged timber.

Sample Statement: We do not support the policy of making salvage logging decisions based on the monetary value of the impacted trees. Vegetation management decisions should be based solely on the needs of overall forest ecosystem health, including species with viability concerns. Serious consideration should be given to allowing areas impacted by insects, disease, ice, wind or fire to recover through natural succession. (#329)

Response: Forest ecosystem health, plant and animal habitat considerations, species viability, reforestation considerations, recreation management, management area direction, and economics all play a role in helping ANF personnel decide whether to salvage as well as how to best accomplish it. Unfortunately, ANF forested land that suffers from tree mortality, decline, or blowdown generally can be expected to have inadequate development of desired herbaceous vegetation and tree seedlings. Active management may often be necessary in order to adequately sustain forest cover on these sites (FEIS pp. 3-126 to 3-131, 3-145 to 3-147 and 3-155 to 3-157). Note that MAs have different design criteria and suitability for salvage harvest (LRMP Table 10, p. 35 and individual MA sections of LRMP Part 4).

Public Interest #154: The Allegheny National Forest should retain the ability to salvage harvest timber in Tracy Ridge and Chestnut Ridge.

Sample Statement: The Tracy Ridge NRA should remain as NRA, with the capability of being able to salvage dead and dying timber. The Chestnut Ridge area could be added to the NRA, but only if it too was accessible for salvage sanitation harvesting of timber. If that condition is not possible, then the Chestnut Ridge area should be allocated to Management Area 3.0. (#215)

Response: The LRMP continues to designate Tracy Ridge as a National Recreation Area (MA 8.2) and designates Chestnut Ridge as a Wilderness Study Area (MA 5.2). Both areas are unsuited for regularly scheduled timber harvest as well as salvage harvest (LRMP Table 10, p. 35). This type of harvest activity is considered

inconsistent with the desire for a relatively undisturbed and naturally evolving forest landscape. MA 8.2 does permit harvest for limited purposes to address recreation and scenery management, wildlife concerns, or forest health (see LRMP pp. 35 and 150). See the ROD (pp. 15-28) for the rationale for the selection of Alternative Cm, including allocation of MAs.

Public Interest #155: The Allegheny National Forest should reconsider allowing timber salvage in remote recreation areas.

Sample Statement: Remote Recreation Areas...will be essential to protecting wildlife habitat and recreation opportunities during the life span of the revised ANF Forest Plan. [We] generally support the proposed management direction for these areas as remaining remote, undeveloped, unroaded, backcountry areas. Timber harvest is considered “suitable” within these areas (PLRMP, page IV-30) although they are intended to support late structural habitat goals and linkages. Timber harvest will remove some of the foundation for the complex structural forests that are the objective of this management. The result is diminished community dynamics (loss of snags, large woody debris on the forest floor, and soil formation) and reduced mineral cycling. (#443)

Response: The ANF has a known history of insect and disease infestations that kill large tracts of the forest as well as natural disturbance from wind that can also cause large blowdown. When left unattended, these areas can result in further insect and disease infestation causing death to neighboring healthy trees and areas. The LRMP allows salvage harvest and reforestation activities in MA 7.2 to help protect the area and adjacent lands from further, potential infestations, to sustain forest health, respond to natural catastrophes, restore forest cover, or to achieve recreation or wildlife objectives. However, as noted in the LRMP (2400 Design Criteria for MA 7.2), changes resulting from vegetation management activities shall be kept as naturally appearing as possible.

3.6.4 Non-Timber Forest Products

Public Interest #156: The Allegheny National Forest should consider managing for the production of medicinal special forest products to replace timber harvest and increase economic benefits.

Sample Statement: In addition, no consideration whatsoever has been given to the tremendous potential for the development of what is known as “non-timber forest products” namely valuable understory herbs like goldenseal, ginseng, or cohosh. In my home in Southeast Ohio, surrounded by the Wayne National Forest, there is significant movement towards a greater understanding of the potential for this undeveloped resource. While the logging of public forests yields substantial revenues for private corporations as well as public agencies, the responsible development of the herbaceous resource can not only replace logging as an economic use of the public forest but also vastly outpace the creation of revenue, jobs and job security for the region. People in the region of the Wayne Nation Forest in Ohio are realizing yields of \$30,000 per acre per year from the cultivation of ginseng, far beyond what logging can produce. The careful and responsible management of these important medicinals can bring these kinds of revenues every year once established, while cutting trees requires a rotation of decades at best to produce even a barely adequate product. (#150)

ENSURE SUSTAINABLE HARVEST OF NON-TIMBER FOREST PRODUCTS

Sample Statement: (We) support FS study and regulation of the gathering of special forest products. The FS should strive to ensure that these resources are used sustainably. (#329)

Response: Forest Service Manual direction dictates the analysis for collection and selling of non-timber forest products. See p. 14 of the LRMP which contains the following goal: “Work collaboratively with special forest product collectors to ensure harvest levels are ecologically sustainable.” Management Areas suitable for commercial collection are listed in the suitable uses section of the LRMP on p. 37. It is not clear what commercial

potential ANF lands could have for sustainable production of non-timber forest products. The LRMP may permit commercial collection consistent with other LRMP direction.

Public Interest #157: The Forest Plan should provide for reserving and protecting areas for the gathering of medicinal plants exclusively by Seneca Nation of Indians citizens.

Sample Statement: There should be a recognized potential for gathering of medicinal plants within specified areas exclusively for Seneca citizens. Protection measures should be included in the plan that ensures these areas are protected from excessive gathering. (#503)

Response: Forest Service Manual direction dictates the analysis for personal collection of non-timber forest products. See p. 14 of the LRMP which contains the following goal: “Work collaboratively with special forest product collectors to ensure harvest levels are ecologically sustainable.” Management Areas suitable for personal collection are listed in the suitable uses section of the LRMP on p. 37. It is not clear what potential ANF lands could have for sustainable production of non-timber forest products. The LRMP may permit personal collection consistent with other LRMP direction.

3.7 Forest Health

3.7.1 General

Public Interest #158: The Forest Plan should actively address forest health issues.

Sample Statement: We support all efforts in the plan to deal with forest health issues. We do not feel this plan or the preferred alternative go far enough to ensure that forest health will be addressed. The DEIS acknowledges a decline in the forest over the plan life. The plan should aggressively address these issues instead of accepting decline because of management choices or budget limitations. (#97)

Sample Statement: Forest health is the most important component of the plan. It is a common thread necessary for all of the forest users to achieve their desires. Without good forest health, future uses of the forest will be limited, as will be the options available. (#163)

Response: We concur that sustaining forest health for future generations is a critical concern. Please note that forest health has been identified as Component 5 of the Forest Vegetation Management issue of Forest Plan Revision (FEIS pp. 1-10 and 1-11). The FEIS contains a discussion of factors that have affected forest health (FEIS pp. 3-78 to 3-84 and 3-93 to 3-105), a discussion of the effects common to all Alternatives (FEIS pp. 3-109 to 3-131), the effects of the Alternatives on forest health (FEIS pp. 3-147 to 3-150), and cumulative effects on forest health (FEIS pp. 3-174 to 3-176).

The LRMP contains specific goals, objectives, monitoring items, research needs, standards, and guidelines focused on sustaining forest health (see 2400 and 3400 sections). The desired condition for the ANF includes an increased diversity of vegetation conditions and improved resiliency of the forest to insects and diseases (see LRMP pp. 10-11). Forestwide goals in the LRMP include sustaining a variety of healthy functioning vegetation layers, and emphasizing integrated pest management methods to prevent or minimize pest problems (see LRMP, forestwide goals, 2400 Vegetation and 3400 Forest Pest Management, pp. 14 and 15). These include improving the overall health and sustainability of the ANF forest ecosystems by reducing understory dominance by native invasive species and non-native invasive species, to encourage greater species diversity with a wider variety of herbaceous and woody plants or tree seedlings (see forestwide objectives, 3400 Forest Pest Management, p. 21). Forestwide guidelines (see LRMP, Design Criteria, 3400 Forest Pest Management, pp. 93-94) include guidelines on sustaining healthier sugar maple, red pine, beech trees that are resistant to the beech bark disease complex and a strategy to address hemlock woolly adelgid. Forestwide goals include emphasizing integrated pest management

methods to prevent or minimize pest problems by using the most current science and available control methods (see LRMP Plan Goals, 3400 Forest Pest Management, p. 15). The monitoring plan includes monitoring forest health changes and threats to forest health on the ANF (see LRMP, Monitoring Plan section, table 15, p. 50 strategic monitoring information, vegetation).

For additional information, see the responses to PIs #170, 123, 121 and 159, and to the ROD (pp. 15-28).

Public Interest #159: The Final EIS should base the definition of forest health on criteria and measures established by biological and ecological principles.

Sample Statement: I take exception to and disagree with the definition of “Forest Health” as contained in the glossary (pg. 6-11) and used as a basis for decision making in the DEIS. Forest Health should be defined based on criteria and measures established by biological and ecological principles. Biological diversity, for example, is not necessarily a measure of a healthy late successional forest. Also natural disturbances, such as blow downs, do not adversely affect the health of a forest since they are a natural part of the ecological cycles of a healthy forest. And “the capacity of the forest to provide a sustainable flow of goods and services for people” is not a criteria or a biological measure of a healthy forest. The health of a forest is more about its capacity to sustain life and its ability to achieve maturity free from human disturbance and management. Unfortunately the ANF has in the past and continues to experience great human disturbance and vegetation management that only complicates the restoration of a healthy forest. (#236)

Response: We have edited our definition of forest health in the glossary to the FEIS, to incorporate resiliency to natural and human-caused disturbances as part of the definition. Presently the ANF is largely even-aged, with most of the forest lacking in advanced seedling regeneration and having understories dominated by interfering vegetation, a condition we do not consider to be very resilient to disturbance. As described by Waring and O’Hara (2005), landscapes consisting of stands of similar sized and aged trees are more vulnerable to damage from a particular pest than if the landscape were composed of stands and forests of a variety of size and age classes. As acknowledged on p. 3-93 of the FEIS, maintaining structural-age class and community composition diversity at the landscape level helps reduce the risks of insect and disease outbreaks and subsequent mortality (Nyland 1996, p. 466).

We anticipate a diversity of tree species and age classes will result across the ANF landscape in Alternative Cm through a blend of even-aged, uneven-aged and passive (no active) management (see discussion on effects to forest vegetation pp. 3-110 to 3-119, 3-126 to 3-131 and 3-132 to 3-139 in Chapter 3 of the FEIS). Taken as a whole across the ANF, a mosaic of predominantly mature and older forest vegetation would exist, with inclusions of younger and mid-structural ages interspersed, and actively managed areas containing multiple age classes within them. This would help sustain structural-age class diversity, community composition diversity, and biodiversity on the ANF landscape.

In addition, see response to PI #147.

3.7.2 Regeneration

Public Interest #160: The Forest Plan should have requirements for securing adequate regeneration of harvested stands in compliance with the National Forest Management Act.

Sample Statement: The 1986 plan provided that “all regeneration areas must be reforested within five years after timber removal.” This requirement is gone in the PLRMP. This is a major omission as it allows the Forest Service far too much latitude in assuring that lands that are logged have adequate regeneration. (#327)

Sample Statement: The 1986 plan lists publications that the Forest Service relied on to determine stocking level requirements. The PLRMP does not list these or any publications and instead simply encourages the

Forest Service to “select the most appropriate silvicultural system for an area that complies with the detailed scientific silvicultural guidelines?” While this provides that the Forest Service “comply” with the silvicultural guidelines that they failed to provide in the PLRMP, this is only after they “select the most appropriate silvicultural system.” Therefore, compliance with this literature is not mandatory because it depends on what the Forest Service deems as appropriate. This lack of a mandatory restocking requirement also violates the NFMA itself. (#327)

Response: The LRMP provides direction (as a Standard) to “...ensure regenerated stands are adequately stocked with the desired species mix within five years of final harvest, single tree or group selection” (LRMP, p. 68, see also p. 69, Natural Regeneration Standards). Appendix A (Table A-1, pp. A-5 to A-7) to the LRMP provides a list of the publications that provide the scientific basis for choosing and developing specific prescriptions for each forest type, including stand or seedling stocking. Local seedling regeneration guidelines, including stocking level requirements (Horsley et al. 1994, pp. 220-222; Bjorkbom and Walters 1986), are described in Appendix A of the LRMP on p. A-2. As stated here, regeneration is considered successfully established when it meets guidelines described by Horsley et al, (1994, pp. 222-223). These are based on local tree seedling regeneration research conducted over the past 30 years on the ANF, which is incorporated in the publications listed on Table A-1 of Appendix A.

In addition, the LRMP is not the only source of direction for management of the ANF. Forest Service Manuals, Forest Service Handbooks, laws, and regulations that provide direction for tree and seedling stocking also apply. Much of this information is not repeated in the LRMP (LRMP p. 3).

Public Interest #161: The Allegheny National Forest should ensure adequate regeneration before timber harvest.

Sample Statement: The Pennsylvania Forest Inventory, 2004, as conducted by the US Forest Service, in partnership with the PA Bureau of Forestry, concluded that “Tree generation is severely lacking and half of Pennsylvania’s forests are at risk of regeneration failure, due mostly to white-tailed deer over browsing.” Since 1955, Seedling-sapling stands have decreased from 23% to 10%, while large diameter tree stands have moved from 28% to 58%. Quoting from the Pennsylvania Regeneration Study: “Based on the following consideration - current white-tailed deer densities, understory conditions, and established guidelines for regenerating hardwood forests for those sites where overstory disturbance has created light conditions where regeneration should occur - only 50% of the study sites had sufficient seedlings and saplings to replace the existing forest with a similar tree composition. (#201)

Response: The ANF shares your concern regarding the need to have tree seedlings in place before conducting a final harvest cut. Excessive deer browsing and interfering plants have severely limited tree seedling development and growth on the ANF just as they have throughout much of Pennsylvania (FEIS pp. 3-93 to 3-95). Silvicultural guidelines (Horsley et al. 1994, pp. 220-222; Bjorkbom and Walters 1986) for hardwood regeneration on the Allegheny Plateau recommend that abundant tree seedlings be present before the final harvest. Local research and experience have shown that a number of reforestation treatments can be used to help ensure successful tree seedling development (FEIS pp. 3-119 to 3-125). ANF personnel have successfully reforested 96 percent of the acres final harvested (by even-aged management) between 1976 and 2001 (FEIS p. 3-155). The majority have been in non-salvage final harvest areas. As you point out, the success rate is initially lower and seedlings develop more slowly for areas suffering from insect and disease impacts or blowdown. Interfering plants are normally abundant, the tree seed source is more limited, and additional reforestation treatments are generally necessary to help establish tree seedlings.

Public Interest #162: The Allegheny National Forest should develop a plan to reduce interfering vegetation and restore native forest diversity.

Sample Statement: The Forest Service must end their intensive management to promote black cherry. Black cherry is a naturally rare species, once making up less than 1% of the forest overstory. This is having dramatic effects on the forest understory. For instance, in 1986 the Forest Service said that 50% of the forest understory had interfering vegetation that limited tree seedling development. Today, the Forest Service said that figure has increased (though they fail to provide an actual figure). This demonstrates that the current management regime is actually part of the problem. The Forest Service must institute a long-term campaign to restore native forest diversity and protect the Allegheny's watersheds. (#124)

Response: The vast majority of ANF forests originated before ANF personnel began to use most of the current reforestation and harvest practices. More than 60 percent of the ANF is older than 80 years, and close to 86 percent of the ANF is older than 50 years (FEIS Table 3-20, p. 3-89). ANF management is designed to promote abundant tree seedlings and a diversity of tree species (LRMP pp. 14, 19, 21, 64, 65 and 67), not a monoculture of black cherry. A number of reforestation practices are designed to help achieve vegetation diversity objectives (LRMP pp. 69-71 and LRMP Appendix A, A-29 to A-41).

Turn of the century cutting brought about dramatic changes in the tree species composition of the ANF. Black cherry, only 0.8 percent of the pre-settlement tree species, represents 23 percent of the trees in today's forest (FEIS p. 3-81). Allegheny hardwoods are dominated by black cherry and constitute 28% of ANF forested land, while forest types dominated by species other than black cherry dominate 72 percent of the ANF (FEIS Table 3-18, p. 3-85). While Allegheny hardwoods comprise the largest portion of the 0 to 50 year age classes (FEIS Table 3-20, p. 3-89), this is not too surprising since much of the regeneration harvesting has been in this forest type where regeneration develops more abundantly. One major factor contributing to this is that black cherry is lower in food preference to deer (Horsley et al, 2003, Morin et al, 2006), and therefore comprises a greater portion of stands regenerated when deer browsing impacts are high. Additionally, black cherry produces seed more frequently, and the seed is viable longer in the soil than most other tree species present on the ANF (Horsley et al., 1994) (FEIS p. 3-87 to 3-88).

It is important to recognize that the forest that existed on the ANF prior to the turn of the twentieth century consisted primarily of northern hardwoods dominated by sugar maple, American beech, and eastern hemlock. The future health of this forest type is of particular concern due to the effects of site nutrient limitations (sugar maple) and non-native insects and diseases (American beech and eastern hemlock) (FEIS pp. 3-93, 3-97 to 3-99, 3-100 to 3-101, 3-103 to 3-104, 3-126 to 3-131, 3-148, 3-164 and 3-174 to 3-175). In addition, see response to PI #211 on LRMP direction to promote forest diversity.

The comment raises a concern regarding the increase (from 50 percent to 70 percent) in the mid-1990s estimate of interfering plant stocking on ANF forested land from that shown in the 1986 Forest Plan. When the 1986 Forest Plan was prepared, approximately 50 percent of the ANF was estimated to have interfering plants abundant enough to limit tree seedling development and require treatment (USDA-FS, 1986a, p. 4-37). However, this estimate was not based on large-scale surveys since ANF personnel did not collect this type of information then. It was based on the results of several small-scale independent surveys, including the following (USDA-FS, ANF, 1995a, pp 25-26):

- Data collected on permanent wildlife transects remeasured in 1979 showed that 44 percent of the plots were dominated by plants that interfere with tree seedling establishment and growth.
- Data collected on 107 research study stands showed that 54 percent of the stands were dominated by interfering plants.

Data from more recent (collected in 1992) and more comprehensive monitoring (on 307,956 acres of MA 3.0) suggests this level of plant interference exists on 70 percent of ANF forested land (FEIS Table 3-22, p. 3-92). It is similar in northern hardwoods (68 percent), upland hardwoods (72 percent), and Allegheny hardwoods (74 percent) and ranges from 66 percent in well-stocked stands to 79 percent in moderately stocked stands.

Additional surveys conducted during 1994 on the ANF in areas (8,343 acres) experiencing forest decline (i.e., where overstory stocking is low to moderate) indicated that this level of plant interference exists on 93 percent of the declining stands evaluated (FEIS p. 3-94).

There are several possible reasons for this potential increase in interfering plants between 1980 and 1992 (USDA-FS, ANF, 1995a, pp. 25 to 27):

- First, the original estimates may have been in error due to the small sample size and the types of areas sampled.
- Second, the density of interfering plants may have increased somewhat in thinned stands from increased light levels reaching the forest floor. These would be a part of the moderately stocked category mentioned above that averages 79 percent interference (versus 66 percent interference in the well-stocked stand category that most likely has not been recently thinned). (Note: However, the majority of ANF forested land area has not had recent intermediate treatments.)
- Third, field observations between 1992 and 1995 indicated increased light following the heavy insect defoliation that occurred on a large portion of the ANF in the early 1990s (FEIS Table 3-23, p. 3-95) most likely played a significant role in promoting an increase in interfering understory vegetation.

In conclusion, the majority of the estimated increase (from 50% to 70%) in forest land stocked with plants that interfere with tree seedling development most likely resulted from naturally occurring environmental factors and the reliability of the estimates. This increase in interfering plants leads to an increased need for reforestation treatments designed to encourage establishment and growth of diverse tree seedlings (see response to PI #163 and 164).

Public Interest #163: The Final EIS should reconsider the effects of deer browsing on regeneration and forest diversity and account for the effects of acid deposition and management activities.

Sample Statement: The Forest Service continues to deliberately manage the timber resource on the ANF for black cherry. They state that fertilizers should be used “primarily on the Allegheny hardwood forest type, where the predominance of seedlings is black cherry”...“Shifts are occurring between the overstory and understory species composition. The understory species composition is dominated by black cherry, with lesser amounts of red maple and black birch. Forest type conversion will most likely occur in the Northern hardwood stands surveyed, with the next stand containing a higher percentage of black cherry. Third growth stands on the ANF, or new forested areas that have resulted from even-aged management applied since the early 1960s, tend to be less diverse in species composition and contain a higher proportion of black cherry than the second-growth stands that resulted from the turn of the century harvesting, largely due to higher deer browsing impacts.” These statements clearly demonstrate that species diversity is not being maintained. The Forest Service tries to blame this loss of species diversity on deer. This is convenient because if the Forest Service can rely on deer as the scapegoat for the loss of species diversity, they can steer the focus away from the consequences of their own management and the reality of the acid deposition problem in northwest Pennsylvania. Quite simply, the deer browsing impacts, while problematic, are just one symptom of an unhealthy and increasingly less diverse forest. (#327)

Response: Allegheny hardwoods are dominated by black cherry and constitute 28% of ANF forested land, while forest types dominated by species other than black cherry dominate 72% of the ANF. While Allegheny hardwoods comprise the largest portion of the 0 to 50 year age classes (FEIS Table 3-18, p. 3-85), this is not too surprising since much of the regeneration harvesting has been in this forest type where regeneration develops more abundantly. All of the Alternatives estimate a gradual reduction in the amount of future Allegheny Hardwoods (FEIS Table 2-3). One major factor contributing to this is that black cherry is lower in food preference to deer (Horsley et al, 2003, Morin et al, 2006) and therefore comprises a greater portion of stands regenerated when deer browsing impacts are high. In addition, black cherry produces seed more frequently, and the seed is viable longer in the soil than most other tree species present on the ANF (Horsley et al, 1994) (FEIS p. 3-87 to 3-88).

Deer browsing impacts are the most important factor affecting understory vegetation development in Pennsylvania since the 1920s (Latham et al. 2005), and the impacts of deer on understory forest vegetation is well documented in Pennsylvania and on the Allegheny Plateau (Hough 1965, Whitney, 1984, Tilghman, 1989, Jones et al., 1993, deCalesta, 1994, Redding, 1995, deCalesta, 1998, Horsley et al., 2003, USDA-FS 2004e). The effects of deer browsing on understory vegetation are well documented throughout the FEIS. Pages 3-82 and 3-93 to 3-95 of the FEIS discuss the history and impacts of deer on understory vegetation on the ANF. As noted on pp. 3-86 to 3-88 of Chapter 3 in the FEIS, shifts in tree seedling composition, diversity and abundance have occurred on the ANF in the past. Consequently, intensive reforestation treatments are needed to enhance tree seedling diversity and abundance on the ANF. The vast majority of reforestation treatments described in Appendix A (pp. A-30 to A-41) of the LRMP, and on pp. 3-119 to 3-125 of Chapter 3 of the FEIS are designed to improve understory vegetation conditions (tree seedling diversity and abundance) that have resulted from this legacy of deer browsing on the ANF.

Fertilizers are used primarily in Allegheny hardwoods on the ANF, because tree species other than black cherry do not respond as well to it. Fertilizer promotes rapid growth of naturally developed tree seedlings so they quickly grow beyond the reach of deer. As noted on p. 3-123 of the FEIS, some areas that receive fertilization may require a release treatment to maintain tree species diversity on the site.

See PI #167 for a discussion of the effects of acid deposition on regeneration and forest diversity.

Public Interest #164: The Allegheny National Forest should allocate staff and funds to address the effects of deer pressure and competing vegetation on regeneration.

Sample Statement: Perpetuating declining species and natural communities is complex and ANF will likely reevaluate its approach as forest conditions change. Clearly, some forest types, in some areas where site conditions are suitable, have declined to such small percentages that they may not reestablish, regardless of management. However, where forest dynamics have been substantially altered, there is a strong argument to correct imbalances and provide the opportunity for natural regeneration. Most prominent is the issue of regeneration as related to deer pressure and competing vegetation (e.g. monotypic fern cover). Increased efforts and expenditures to address these issues will benefit the forest in the long run. (#95)

Response: We concur that sustaining forest species and forest types is a complex topic involving numerous agents that have the potential to initiate change. Forest dynamics do have the potential to change over time, as has been demonstrated by past interactions that have affected forest health (FEIS pp. 3-78 to 3-84 and 3-93 to 3-105). Deer are no exception. Following implementation of the Deer Management Assistance Program (DMAP) in 2003, the ANF deer population has dropped by more than 17 percent. It is possible that deer will return to historic levels that challenge forest understory vegetation health. Regardless of future deer impacts, interfering understories that are well established will still need to be treated to encourage establishment and growth of diverse tree seedlings (FEIS p. 3-95). Substantial reforestation activity and investment will be necessary to help ensure adequate tree seedlings develop (FEIS pp. 3-119 to 3-125 and 3-155 to 3-159). Forestwide objectives include improving the overall health and sustainability of ANF forest ecosystems by reducing understory dominance by native invasive

species on 3,000 to 6,200 acres annually (see LRMP p. 21). The LRMP provides for monitoring seedling stocking following regeneration harvest (LRMP Table 13, p. 39) and determining adjustments that may need to be made to silvicultural practices (LRMP Table 15, p. 50). Reforestation activity costs have been included in the financial analysis for each Alternative.

Public Interest #165: The Forest Plan should emphasize timber harvest by helicopter to improve regeneration success.

Sample Statement: It appears to me that with your new funds that a solution to some problems would be to buy a harvesting helicopter. I read the complaints about how \$6,000 trees are rotting on the forest floor. What could be easier than to drop a cable and lift them out...Log skidders are not only the most destructive equipment in the forest also they lay waste to the next generation of trees small and good size on there path of devastation to gain a dollar and lose ten plus. (#102)

Response: The type of harvesting equipment (including helicopter) used during salvage or other types of harvesting would be determined when future projects are proposed and developed, and is dependent on many variables including future access needs for silviculture, wildlife and recreation. Safety, cost and soil and water impacts also need to be taken into consideration. Decisions of this nature are made at the site-specific level, and are based on the characteristics of each area and the forestwide and management area standards and guidelines, particularly those in the 2400 and 2500 sections (LRMP Part 3 and Part 4). While log skidders can damage some tree seedlings present on the site being harvested, small seedlings generally are less affected, seedling root systems often resprout, and additional seedlings often develop in the scarified soil. Mitigation measures are frequently applied on the ANF to protect advanced tree seedling regeneration, for instance, limiting harvest activities to wintertime when tree seedlings are dormant. ANF personnel have successfully reforested 96 percent of the acres final harvested (even-aged management) between 1976 and 2001 (FEIS, p. 3-155).

In addition, see response to PI #70.

3.7.3 Deer Management

Public Interest #166: The Allegheny National Forest should establish a buck kill index and separate management practices for Deer Quality North, South and the remaining ANF.

Sample Statement: A buck kill index should be established for the ANF, Deer Quality North and South areas. The index may be the same or different for these areas depending up on all factors that affect deer populations. We have found that a buck kill index of 4.5 per sq. mile will stabilize the deer population in the 65,000 acre Allegheny State Park. However, you must be advised that there's no commercial harvest of timber in Allegheny State Park. Therefore, the buck kill index in the ANF, could be higher because you are doing some commercial timber harvesting. Also, the antler restriction adds an additional problem. You are carrying a whole cohort of deer (yearling bucks) that are not legal to be harvested except by: non-ambulatory, junior, or active military hunters. I suggest that you manage the 3 areas- Deer Quality North, South, and the remaining ANF as follows: "Yearling antler beam diameters should average about 15 mm. Sub-legal bucks (primarily yearlings) should not exceed 5% of the antlerless harvest." Reproductive rates should be such that at least 75% of the yearling females are bred. I doubt that you could achieve any significant number of female fawns being bred. 2 1/2 and older does should be producing multiple fawns. In closing, hunters can have a reasonable number of deer on the ANF as well as reasonably antlered bucks if the deer get enough quality food to survive the winter. Quality food must be present throughout the forest. (#315)

Response: The LRMP objective for deer management is to manage the deer herd at a level that will provide a quality hunting experience while allowing diverse forest understories to recover (10 to 20 deer per square mile, see LRMP p. 20) Objectives for deer management that focus on beam diameters and reproductive rates are more

detail than is appropriate at the Forest Plan level. Deer are managed cooperatively between the Pennsylvania Game Commission (PGC) and the Forest Service on the ANF. PGC is primarily responsible for managing populations while the FS is primarily responsible for managing the habitat.

3.7.4 Acid Deposition

Public Interest #167: The Final EIS should address the impacts of acid deposition and air pollution on regeneration.

Sample Statement: The Bradford Era recently reported: “(Penn State Forest Hydrologist Bill Sharpe) said even though black cherry seems to be doing very well in this part of the country (or world) he suggests that may not always be the case. ‘Every species has its tolerance, these things will drop out one by one - who knows where we are headed? We can’t be too comforted that the most valuable species is doing so well because that may change in the future,’ said Sharpe in closing.” (“Professor blames acidic soil for oak death.” Bradford Era, July 20, 2006)...It is likely a contributing factor as well to the problem associated with interfering plants in the understory: “When the 1986 Forest Plan was prepared, approximately 50 percent of the ANF was estimated to have interfering plants abundant enough to limit tree seedling development and require treatment. Data from more recent forest-wide vegetation monitoring efforts suggest a trend in increasing interfering vegetation in the ANF understory.” The DEIS is deficient in addressing the impacts from air pollution generally, and acid rain specifically. The Air Resources section in the DEIS is not even 10 pages long. This is clearly inadequate when “the ANF is near one of the largest sulfur dioxide emitters in the country, and the resulting acidic sulfate deposition is among the heaviest in the nation.”...Deer populations are regulated by the Pennsylvania Game Commission (PGC), but the Forest Service has joined the Kinzua Quality Deer Cooperative in association with other agencies and organizations to address the impacts of deer in the Allegheny. It seems reasonable that the Forest Service could do the same regarding oil and gas drilling and/or acid rain with other regulatory agencies and organizations. (#327)

Response: Forestwide LRMP goals for 2500 Watershed and Air (p. 16 of the LRMP) include a goal of cooperating with regulatory agencies to reduce adverse effects of air pollutants and acid deposition on forest ecosystems.

Pages 3-54 and 3-100 of the FEIS discuss the effects of ozone on ANF forest vegetation. Local monitoring indicates ozone has not substantially damaged woody vegetation on the ANF.

The FEIS acknowledges that acid deposition has affected soil nutrient status and chemistry on the Allegheny Plateau (see pp. 3-7 to 3-9, 3-10 to 3-13, 3-15 to 3-16, 3-19 to 3-20, 3-51, 3-52 to 3-55 and 3-100 to 3-102 of Chapter 3). The monitoring section of the LRMP (Table 16, p. 52) includes a research question to assess the extent that soil acidification is affecting the physical, chemical and biological processes of soils on the ANF.

We reviewed a publication by Dr. Sharpe (see p. 3-88 of the FEIS) on the effects of soil acidity on interfering hayscented fern abundance and sugar maple seedling occurrence (Sharpe and Halofsky 2004) during development of the revised LRMP. This publication concluded that higher hayscented fern abundance was observed on soils with lower O (organic) soil horizon calcium to aluminum ratios and lower percent canopy cover. On the Allegheny Plateau, acid deposition has resulted in lower soil pH levels, calcium and magnesium nutrients, and more available aluminum (Bailey et al. 2005), lowering the calcium to aluminum ratio. The lower canopy cover investigated by Sharpe and Halofsky resulted in increased sunlight on the forest floor, allowing hayscented fern plants to expand. They concluded that the percent cover of hayscented fern was strongly correlated with lower tree canopy densities (accounted for 53% of the fern variation), while O (organic) soil horizon Calcium to Aluminum ratios accounted for 18 percent of the variation in fern cover. The evidence presented in this paper suggests that fern may be able to occupy forest sites with more acidic (lower calcium to aluminum ratios) soils, but to what degree is uncertain.

The study by Sharpe and Halofsky (2004) did not consider the impacts of deer on understory forest vegetation, which is well documented in Pennsylvania and on the Allegheny Plateau (Hough 1965, Whitney, 1984, Tilghman, 1989, Jones et al., 1993, deCalesta, 1994, Redding, 1995, deCalesta, 1998, Horsley et al., 2003, USDA-FS 2004e). Sugar maple seedling regeneration is highly preferred by deer, and hayscented fern and other plants not preferred as deer food expand in the presence of heavy deer browsing impacts (Horsley et al. 2003). Horsley et al. (2003) investigated the response of a number of herbaceous and woody understory plants at various deer densities. All sites in this study were equally affected by acid deposition, while deer densities were closely controlled. Ten years following overstory thinning (increases light to forest floor by reducing overstory tree canopy cover), fern cover had increased the most under highest deer densities, suggesting that fern cover is highly correlated with increased light levels and high deer densities. As observed by Horsley et al. (2003), when deer density becomes too high, species composition, height growth and diversity of understory vegetation is altered significantly.

Public Interest #168: The Forest Plan should classify lands affected by acid deposition as unsuitable for timber harvest.

Sample Statement: You suggest now 20,000 acres are unsuitable “due to an inability to restock the lands in 5 years”. Acid Rain leaching has been going on for 50 years. “It will contribute to leaching of base cations from the soil”. There is no “uncertainty” about it. You truly note “a study of the changes in soil nutrients and pH over a 30 year period beginning in 1967, showed statistically significant reduction in exchangeable calcium and magnesium concentrations and pH throughout the soil profile”. Everywhere regional acid deposition has acidified landscapes with increasing effect. Today on infertile geologies and soils timber is not a renewable resource. You must reserve these from a harvest. This geology should be placed in Wilderness or wild recovery area until they would qualify. (#20)

Response: The effects of acid deposition on the soil resource are described in section 3.2.2 of Chapter 3 of the FEIS, soil nutrients sections (pp. 3-8, 3-9 and 3-19 to 3-20) and in section 3.2.4 air resources (pp. 3-52 to 3-55, 3-62, and 3-63). The forest health (acid deposition section) portion of the affected environment for forest vegetation (section 3.3.1, pp. 3-101 and 3-102) discusses the effects of acid deposition on forest vegetation.

As noted in the site/species nutrient capability section within the forest health portion in Chapter 3 of the FEIS (pp. 3-100 and 3-101), research has provided recommendations to maintain the health of sugar maple and other tree species (e.g. ash, basswood) with higher base cation requirements, which are incorporated in forestwide design criteria. These include considering proactive insect suppression activities to reduce stressful conditions for species with high base cation requirements, choosing appropriate sites to culture species with high base cation requirements, and conserving base cations on sensitive upper slope and plateau top sites by retaining tops and branches on site to conserve Ca and Mg (Horsley et al. unpublished 2005a). In addition, new guidelines exist in the LRMP (p. 71) to limit application of nitrogen-based fertilizer, particularly on plateau, shoulder and upper backslope landforms, in order to minimize loss of soil base cations resulting from acid deposition on the unglaciated Allegheny Plateau.

We considered the potential effects of acid deposition and concluded that forested lands on the ANF are considered suitable for commercial timber harvest for the following reasons:

- Based on the best available scientific information, the effects of harvesting methods used on the ANF on soil nutrient levels and overall soil productivity are minor (Knoepp and Swank 1997, p. 6; Johnson, Romanowicz and Siccama 1997, p. 867; and Johnson and Todd 1998 p. 1734), and harvest of timber on acidic soils will not lead to irreversible soil damage. This is true regardless of the magnitude of effects due to acid deposition. (see FEIS pp. 3-10 to 3-13, 3-15 to 3-16, 3-19, and 3-20).

- Soils are capable of producing at least 20 cubic feet per acre per year of commercial forest products. As noted on p. 3-101 of the FEIS, while some base cation-demanding species (such as sugar maple, white ash and basswood) may be more vulnerable to stress events such as insect defoliation (Horsley et al. 1999, pp. 60-62) on unglaciated upper slope sites and the plateau top sites, the growth and health of other tree species such as black cherry, American beech, white pine, chestnut oak, black birch, red pine, and red maple seems unaffected by lower local base cation availability on many sites (Horsley et al. 2002, p. 41; Long et al. 1997, pp. 1563, 1564 and 1566; Long et al. 1999 pp. 56 and 57; Demchik, M.C., Sharpe W.E., 1999).
- Based on existing technology, knowledge and resource management objectives there is reasonable assurance that suitable lands on the ANF can be adequately restocked within 5 years of final regeneration harvest. As noted on p. 3-116 of the FEIS, reforestation success with even-aged management on the ANF has been quite good (96% adequately stocked with tree seedlings in 2001) (USDA-FS 1998, pp. 17-18 and 86; Table 16 in reforestation program effectiveness section, USDA-FS, 2002, p. 21-23).

The 20,520 acres of forest land physically not suited for commercial timber harvest because restocking within 5 years cannot be assured have been assigned to this category for several reasons. These lands are too steep, too wet, or too rocky for ground based mechanical equipment to conduct the reforestation treatments that would be necessary to establish adequate seedlings. Interfering plants generally are the dominant vegetation and few tree seedlings are present. Deer browsing plays a large role in the restocking of lands as well, discussed in FEIS 3.3.1 Affected Environment - Background and Historical Perspective - Anthropogenic (Human-caused) Disturbances - Deer Herbivory.

Public Interest #169: The Final EIS should incorporate the 1998 Penn State University Conference findings regarding the impacts of acid rain on forest health.

Sample Statement: The ANF Draft Plan needs to incorporate the findings of the Penn State University Conference On Air Pollution And Acid Rain's impacts on Pennsylvania's forest health. In 1998, Forest Hydrologist Dr. Bill Sharpe from Penn State College of Agricultural Sciences and PA State Representative Jim Lynch "assembled a blue ribbon international team of acid rain researchers to look at Pennsylvania's forest health problems. Their conclusion was that conditions in Pennsylvania's forests were as bad as they had seen anywhere in the World." (#295)

Response: The conference proceedings were considered and two articles added in the FEIS (section 3.2.2 Soil Resource - Affected Environment - Soil Nutrients). Other, more recent literature on acid deposition effects was used as well. For details, see response to PIs #167 and 168.

3.7.5 Use of Timber Harvest

Public Interest #170: The Forest Plan should emphasize the use of timber harvest to address forest health issues.

Sample Statement: Currently over two-thirds of the forest is stocked with maturing timber that is increasingly becoming susceptible to insects, disease, decay and wind throw. This plan does not adequately address this health issue but pushed this maturing timber further toward the old growth classification. This is accomplished by a lack of management, by a lower ASQ, by transferring productive land into less productive/non-productive management areas, by not addressing the age class distribution problem, and by using uneven-aged management which is costly and an unproven regeneration method on this forest. (#132)

Response: As noted on pp. 3-109 and 3-110 of the FEIS, under integrated pest management, silviculture is an important part of an integrated pest management program and can be a valuable tool in the prevention, mitigation

and restoration of forest ecosystems threatened by introduced forest pests that are responsible for reducing biodiversity, compromising ecological integrity, disrupting ecosystem dynamics and displacing native species (Waring and O'Hara 2005).

In Alternative Cm, 95% of the ANF is available for harvest activities for resource purposes such as addressing forest health concerns, responding to natural catastrophes, restoring forest cover, or to achieve recreation or wildlife objectives.

The effects of forest management and timber harvest on forest health are discussed on pp. 3-109, 3-147 to 3-150, and 3-174 to 3-176 of the FEIS. The effects on forest vegetation where no active management would occur are discussed on pp. 3-126 to 3-131 and 3-164 to 3-166 of the FEIS. Overall effects of forest management activities on vegetation in each Alternative are discussed on pp. 3-131 to 3-160 and 3-166 to 3-179.

In addition, see response to PIs #147 and 158.

3.7.6 Prescribed Fire

Public Interest #171: The Allegheny National Forest should ensure that prescribed fire benefits forest health and does not damage privately owned structures.

Sample Statement: Use of prescribed fire should be carefully analyzed and controlled to ensure that it both benefits overall forest ecosystem health and does not damage privately owned cabins or homes. (#329)

Response: Any prescribed fire proposal will have to go through site specific review and documentation of effects under NEPA. Site specific effects to forest ecosystem health are addressed at the project level. In addition to analyzing effects under NEPA, each site specific prescribed burn project requires that a Prescribed Fire Burn Plan be prepared in advance of ignition. Some specific parameters that are addressed in a Prescribed Fire Burn Plan include weather inputs (temperature, relative humidity, wind speed and direction), smoke dispersal, contingency plans and identifying specific ignition patterns required to meet burn objectives and the safety of the public.

3.7.7 Non-Native Invasive Species, Pests and Diseases

Public Interest #172: The Final EIS should include a detailed analysis of invasive species management.

Sample Statement: I did see a little bit of a mention to invasive species management, but would have appreciated a larger section devoted to it (unless I missed this, in which case I apologize). I work on invasive species a lot and know what a considerable problem they can be to the successful management and restoration of natural habitats. Human interference (trail and road development, mining, recreation, etc.) can further exacerbate the problem. I would have just liked to know what you are doing to manage and control these invasives, particularly with an expected increase in human presence with some of the proposed alternatives. (#431)

Response: The Forest Service's National Strategy and Implementation Plan for Invasive Species Management and the Region 9 Non-native Invasive Species (NNIS) Framework guide NNIS management on the ANF. Central to both is a focus on cooperative relationships with states, counties, organizations, tribes and other landowners. In addition, the ANF Botany Program encompasses an integrated ecosystem management approach to managing the botanical resources of the ANF. A major component of the Botany Program is invasive plant prevention, early detection of new species, treatment and monitoring.

The LRMP includes goals and objectives relative to NNIS control (see 2080 Noxious Weeds on pp. 13 and 18 of the LRMP), including an objective to treat 300 to 600 acres of invasive plants annually. It is not appropriate to list all the details of the NNIS program within the LRMP or FEIS. Refer to FEIS, Chapter 3 section 3.3.3 Non-Native Invasive Plant Species and Appendix A of the LRMP, Non-native Invasive Species (NNIS) Treatment section for a brief discussion.

Public Interest #173: The Forest Plan should contain standards and guidelines for non-native and invasive species control in MA 5.0.

Sample Statement: Page IV-19, MA 5.0 Design Criteria, Section 2600 Wildlife, Fish and Sensitive Plant Habitat. I would recommend the addition of Standards and Guidelines for non-native and invasive species control. (#235)

Response: Two management areas have been developed between draft and final for management of designated wilderness (MA 5.1) and recommended wilderness study areas (MA 5.2). Both MA 5.1 and MA 5.2 recognize insects and diseases as a natural part of the ecosystem and are not controlled, unless epidemics are expected to cause unacceptable damage to adjacent lands and resources, or exotic species are expected to cause an unnatural loss to the wilderness resource. Noxious weeds and invasive non-native plant species may be treated by physical means, such as grubbing or herbicides may be used.

Public Interest #174: The Forest Plan should prohibit the use of non-local firewood to minimize the introduction of non-native invasive insects.

Sample Statement: Prohibiting the use of non-local firewood will increase the ANF's long term resilience to non-native invasive insects, and buy critical time while management tools are developed against these new threats. (#430)

Response: We share your concern regarding potential impacts of non-native insects. The LRMP does not include a standard or a guideline for the planning period that prohibits the use of non-local firewood. Current efforts involve public education on not transporting firewood from outside the local area. Additional guidance may be provided through an administrative decision such as a closure order and may be considered and employed during Forest Plan implementation.

Public Interest #175: The Allegheny National Forest should collaborate with PennDOT to utilize volunteers to pull invasive plants along roadways.

Sample Statement: I would like to see more emphases placed on stopping the invasive non-native plants into the forest as well. This could be done in partnership with the Penn. Dept. of Transportation; by having people pick invasive plants like they pick up trash now. I think that more funds need to be given for the education of the public on how invasive plants can harm the environment. (#277)

Response: The LRMP does not preclude collaboration or dictate funding for NNIS management activities. The ANF conducts treatment of NNIS plants each year utilizing staff and volunteers. See the response to PI #172 for more details.

Public Interest #176: The Forest Plan should prioritize treatments of non-native invasive species to protect species of concern and to protect specially designated areas.

Sample Statement: Page II-2, section 2080 Noxious Weed Management would encourage the addition of the following: "Prioritize invasive plant treatment efforts on areas of greatest concern to protect rare, threatened or endangered species or to protect specially designated areas such as Wilderness where invasive species are most incompatible with long-term stewardship goals." (#235)

Response: Appendix A of the LRMP (pp. A-43 to A-44) Non-native Invasive Species (NNIS) Treatment section discusses determining the priorities for treating NNIS. Site specific factors are part of determining treatment priority.

Public Interest #177: The Forest Plan should prohibit planting any non-native grass or shrub species in permanent openings.

Sample Statement: Management of permanent grass/shrub openings should favor native plant species, as stated. This should include a prohibition on planting any non-native grass or shrub species. (#329)

Response: This is covered in the second guideline in the LRMP Part 3 Design Criteria under the section 2070 Biological Diversity (p. 53). In addition, refer to PI #256.

Public Interest #178: The Forest Plan should strengthen the zebra mussel prevention program.

Sample Statement: The Draft Plan is totally deficient in demonstrating any commitment by the FS to protect the Allegheny River ecosystem from invasive Zebra Mussels. The FS's voluntary inspection and monitoring program by the boating public is a disaster in progress for populations of endangered native species and freshwater mussels in the Allegheny River ecosystem. (#295)

Response: The LRMP has an objective for preventing zebra mussel introduction into the Allegheny Reservoir and Allegheny River from Forest Service boat access sites. This objective is stated on p. 20 within the 2600 section of Part 2 Strategy of the LRMP and states in part that preventing the introduction of zebra mussels in the Allegheny Reservoir and Allegheny River from Forest Service boat launches to contribute to the recovery (or protection) of federally threatened, endangered and candidate species. Conservation Measures, included in Appendix C of the Biological Evaluation, spells out the various activities that would occur to address this objective. One of the measures that will be implemented is watercraft will be screened at boat launches by the Forest Service, similar to what has been done in the past.

Public Interest #179: The Forest Plan should modify the objective of preventing the introduction of zebra mussels into the Allegheny Reservoir to include the Allegheny and Clarion Rivers.

Sample Statement: Page II-32, Section 2600 Wildlife, Fish and Sensitive Plant Habitat: I would recommend the Objective “Prevent the introduction of zebra mussels into the Allegheny Reservoir” be changed to “Prevent the introduction of zebra mussels into the Allegheny Reservoir, the Allegheny River and the Clarion River.” I would then recommend the corresponding Monitoring Question be changed accordingly. (#235)

Response: The Allegheny River has been added to the objective (LRMP p. 20) and monitoring section (LRMP p. 47) of the LRMP. The Clarion River wasn't added to the statements because the primary focus of preventing zebra mussel introduction is to prevent effects to the endangered mussels in the Allegheny River. The highest potential is from powerboats launching into the Allegheny Reservoir. By recognizing that it is important to prevent the introduction of zebra mussels and other invasive species from all waters of the ANF, we have had an educational program in place for several years to inform the boating public of these concerns and the methods to prevent their spread.

Public Interest #180: The Allegheny National Forest should maintain the hemlock component of the northern hardwood forest type.

Sample Statement: In particular, the stated acceptability of simply “giving up” on adelgid infested hemlock stands and converting them to other species or forest types through the use of even-aged management is unacceptable. Hemlock is a vital component of the northern hardwood forest type and should be conserved using all available means. (#329)

Response: We are equally concerned about sustaining hemlock on the ANF (FEIS pp. 1-10 and 1-11 and 3-103 to 3-104) since hemlock woolly adelgid could substantially impact it within the next five to fifteen years. Eastern hemlock plays an important role in sustaining ecosystem health and provides important wildlife habitat (FEIS pp. 3-174 to 3-175, 3-188, 3-196 to 3-198, 3-262 and 3-268). Our current strategy is to maintain the hemlock type where it is present on the ANF. If eastern hemlock mortality develops from hemlock woolly adelgid, it may be necessary to replace the lost conifer component through planting other conifer species, in order to maintain some of the important ecological values that hemlock trees provide (LRMP Appendix A, p. A-18). Objectives on p. 19 of the LRMP call for providing a conifer component (greater than 15 BA per acre) on a minimum of 10 percent of the ANF. LRMP goals and objectives emphasize using integrated pest management methods to prevent or minimize pest problems by using the most current science and available control methods (LRMP p. 15 and LRMP Appendix A, pp. A-3 to A-4). ANF personnel have identified a need for research directed toward developing integrated pest management techniques that will help sustain healthy hemlock (LRMP Table 16, p. 52).

In addition, see response to PI #181.

Public Interest #181: The Allegheny National Forest should consider planting alternative species to replace eastern hemlock stands before infestation by the hemlock wooly adelgid (HWA) occurs.

Sample Statement: Page III-40, Section 3400 Forest Pest Management; Forest Insects: I disagree with the proposed guidelines for dealing with the hemlock wooly adelgid (HWA). If the ANF waits until the HWA arrives in the forest before considering providing an alternative conifer species to replace some of the ecological functions of hemlock, even if white pine and red pine are maintained or enhanced, there may be a period of a decade or more where the important ecosystem functions currently provided by hemlocks are severely diminished. I would suggest that, based on the research from other parts of the eastern United States where the HWA has already arrived, the ANF consider a more proactive approach and immediately begin planting additional, native conifer species in critical areas such as along riparian corridors. (#235)

Response: We agree that the ecological functions of hemlock and other conifers are important to overall ecosystem function and health. LRMP objectives include maintaining a conifer component (greater than 15 BA per acre) on a minimum of 10 percent of the ANF (LRMP p.19). As noted in Appendix A to the LRMP (p. A-3), research is actively evaluating new strategies to reduce or mitigate effects of HWA throughout the eastern United States. When the HWA is discovered on the ANF, a strategy will be developed based on the most current treatment options available at that time, infestation levels, and prioritization of treatment areas. As acknowledged on pp. A-3 and A-4, in the interim, other conifers present on the ANF, including white pine and red pine, will generally be maintained or enhanced. Over the long term it may be necessary to replace hemlock with other conifers to maintain some of the ecosystem services provided by hemlock.

Hemlock mortality rates from the HWA in other eastern states have varied by site, elevation, host tree abundance, weather, slope, proximity to water, and temperature (McClure and Cheah, 2002; Mauper et al 2002). Consequently, uncertainty exists as to how much, where, and when local hemlock mortality may occur on the ANF from HWA. (see p. 3-175 of the FEIS, 3.3.1 forest vegetation, cumulative effects, forest health). Therefore, we feel it is more prudent to continue monitoring health of hemlock trees on the ANF, and consider planting to restore conifer seedlings once we can ascertain the effects of HWA on the ANF. Areas to be planted would be determined at a site specific project level, based on prioritization of areas to restore, the amount of mortality that occurred, site considerations, and other factors.

In addition, planting of tree seedlings is a very costly activity on the ANF, and survival rates of different tree species has varied in the past. Hemlock often grows in well-stocked clumps, particularly in riparian areas, where light that is necessary to establish tree seedlings, including planted conifers, is limited on the forest floor. Survival of conifers (eastern hemlock and white pine) planted between 1996 and 1999 as part of the ANF reforestation program has been much lower than desired (USDA-FS, 2004c, pp. 50-51). Overstory shade and interfering plants

have likely contributed to the low survival. Consequently, we are concerned that planted stock may not survive very well until there is adequate light to sustain their growth.

In addition, see response to PI #180.

Public Interest #182: The Allegheny National Forest should allocate funding to the propagation of a natural predator of the HWA.

Sample Statement: Allegheny National Forest should budget funds for the propagation of insect predators of the Hemlock Woolly Adelgid. I understand there is one, a small lady beetle which is being used experimentally now, and at least 2 other insects which also have potential for controlling the adelgid. I disagree with the proposal to thin hemlock stands to make it harder for the adelgid to travel from stand to stand. (#127)

Response: We agree that the HWA will need to be addressed when it is discovered on the ANF. Monitoring for this insect has been ongoing since 2004, and none have been detected on the ANF to date. Pages 3-103 and 3-104 of the forest health section in Chapter 3 of the FEIS discusses the history, impacts, ANF status, and potential controls for HWA.

The HWA needs to be present for predator release to be effective (HWA is the sole food source for the predatory beetles). Predator release is a method we will consider, along with other treatment options, when HWA infestation is more imminent. As noted in the forest health section of the FEIS, although predator release is considered to be an effective treatment to reduce established HWA populations, longer term establishment of these predators largely does not appear successful to date (PA-DCNR, 2005). In other words, surveys completed the year following release of the predatory beetles are only able to locate a few of the released beetles, raising questions on the ability of these predators to become established in our ecosystems for a longer term, more permanent control of HWA.

Several control methods have been utilized and are actively being researched to control HWA populations in other parts of the eastern United States, including predator release and chemical controls. Fungal controls are currently being researched, and silvicultural treatments (thinning) to mitigate impacts of HWA are being researched by the Northern Research Station here on the ANF. A thinning study is underway to determine if thinning around hemlocks prior to HWA arrival will improve the health and vigor of remaining hemlock trees by providing additional growing space, thereby enhancing the survival of hemlock once HWA infestation occurs. This is being tried on a very limited basis in specific study sites.

At such time the HWA is discovered on the ANF, a strategy will be developed based on the infestation levels anticipated, the most current science-based treatment options available at that time and a prioritization of the affected areas (see both Appendix A to LRMP, p. A-3 and forestwide design criteria in the LRMP, 3400 Forest Pest Management, Hemlock Woolly Adelgid section, p. 94).

Public Interest #183: The Forest Plan should implement potential controls on the HWA on private property.

Sample Statement: We would like you to consider including our property and the surrounding area (see attachment) as a research area in implementing potential controls on the woolly Adelgid. (#217)

Response: Selection of potential sites for HWA research would occur at the project level and would depend on the characteristics of the site, the nature of the research, the type of treatment proposed, and the proximity of HWA to the site. The research branch of the Forest Service generally selects sites and conducts research activities, while the State and Private Forestry branch of the Forest Service provides forest health assistance to both National Forests and other landowners. Local Service Foresters with the Pennsylvania Bureau of Forestry advise

landowners on forest management on their property. The LRMP does not authorize ANF personnel to conduct vegetation management or integrated pest management activities on private lands. However, results of research activities conducted on National Forests or other publicly-owned lands are useful to a variety of landowners. Studies on ANF lands often focus on management activities suitable for managing very large forested landscapes. In many cases, different, smaller-scale treatments of insects or diseases are more appropriate on privately-owned lands, including the use of EPA approved pesticides. Additional information concerning HWA, including potential controls, is available through the several internet websites, including the following:

- <http://www.na.fs.fed.us/fhp/hwa/>
- <http://www.dcnr.state.pa.us/forestry/woollyadelgid/index.aspx>
- <http://www.caes.state.ct.us/FactSheetFiles/Entomology/fsen012f.htm>

Public Interest #184: The Allegheny National Forest should not consider American beech undesirable vegetation.

Sample Statement: Beech is a native species valuable to wildlife as a source of mast. It should not be considered interfering vegetation or undesirable. (#329)

Response: We agree that American beech is an important tree species that provides important multiple resource benefits, including mast for wildlife. Unfortunately, beech bark disease complex has and will continue to cause significant beech tree mortality and decline. It affects the largest trees first, often causing prolific beech root sprouting. Unfortunately, these root sprouts, like the parent trees from which they originate, are also susceptible to the disease. The disease can prevent these trees from growing to maturity, and it often results in their early death. The lack of mature trees and stress from the disease severely affects mast production. Dense thickets of beech root suckers and seedlings also limit development of other tree species (FEIS pp. 3-97 to 3-99, 3-128 to 3-129, 3-164 and 3-174 to 3-175).

The LRMP contains a guideline in the 3400 Forest Pest Management section (LRMP p. 94) to favor those beech trees that have characteristics indicating they may be resistant to beech bark disease complex and to remove those trees that are susceptible. ANF management would strive to increase the component of resistant American beech, thereby improving the potential for mast production. For additional information, please refer to the response to PI #199.

Public Interest #185: The Forest Plan should promote and restore hemlock, beech and American chestnut trees that are resistant to forest health threats.

Sample Statement: Given that a subset of both beech and hemlock trees normally survive infestation, these species themselves should be promoted in order to establish the maximum number of resistant stems possible. (#329)

Sample Statement: We support Forest Service efforts to introduce disease resistant strains of American chestnut and American beech created through selective breeding and hybridization into the ANF. These species were/are ecologically important and desirable. We do not support the use of stock created through artificial laboratory genetic engineering (#329)

Response: We concur with your interest in using planting stock developed through selective breeding and hybridization. Your preference for stock that has not been genetically engineered is noted.

The LRMP contains a 2400 Vegetation goal to restore American beech when genetically disease-resistant stock becomes available that is physiologically appropriate to the Allegheny Plateau (LRMP p. 14). The LRMP 3400 Forest Pest Management section contains guidelines for favoring the development of potentially resistant

American beech, discouraging susceptible American beech and for responding to hemlock woolly adelgid when it is discovered on the ANF (LRMP p. 94). For additional information regarding hemlock, see the response to PIs #180 and 182. The LRMP includes a goal to restore disease resistant American chestnut, butternut, and American beech to the ANF (LRMP p.14).

Several research questions related to sustaining American beech that is resistant to the beech bark disease and healthy hemlock on the ANF are included in the monitoring section of the LRMP (see Table 16, p. 52).

In addition, see response to PI #186.

Public Interest #186: The Allegheny National Forest should support research efforts on forest health threats to beech and hemlock.

Sample Statement: As for the forest health issues already facing the ANF, the threats to both beech and hemlock, although the Forest Service says it will put resources into looking for effective responses to those threats, it is noteworthy that the Northeast Research Station has not produced any published reports or studies in this regard that (we) could locate. All the studies regarding the threats to these two tree species that (we) could locate have been produced by other national forests and other research entities. (#327)

Response: We presently have several ongoing studies (including beech and hemlock studies) on reducing impacts of forest health threats, in partnership with the Northern Research Station, which will continue under LRMP direction (see LRMP monitoring plan, Table 16, p. 52), and Appendix A to the LRMP, pp. A-3 and A-4). Note that the majority of current vegetation research questions included in the LRMP focus on evaluating methods to address threats to the health of various tree species in forested ecosystems on the ANF. These research needs include:

- sustaining healthy hemlock trees in the face of hemlock woolly adelgid infestation
- increasing success in developing seedlings and retaining healthy sugar maple trees
- sustaining and regenerating a healthy American beech component
- evaluating methods to sustain oak ecosystems on the ANF, which contribute to the biodiversity of the Allegheny Plateau
- preventative/remedial strategies to deal with a variety of insects and diseases

3.8 Herbicides

See PI #250 for additional response to comments on herbicides not contained in section 3.8.

Public Interest #187: The Forest Service should use vegetation management practices that limit the impact of herbicides on wildlife.

Sample Statement: pg 3-104 - killing vegetation will “temporarily” impact wildlife is what you write. but you consider “temporary” 3 years or so. What is the wildlife supposed to do for food for those 3 years. It will die from such use. (#44)

Response: In the Direct and Indirect Effects section of Chapter 3 of the FEIS (pp. 3-215 to 3-217 and 3-225 to 3-226), we have added discussion regarding the effects of herbicide treatment on vegetation composition and structure and on associated wildlife species. We anticipate no substantial risk to wildlife or aquatic species from

exposure to herbicides. Some wildlife use may temporarily shift to adjacent areas with more suitable habitat or food sources. In addition, the effects from herbicide treatments are inherent in the Plant and Animal Habitat Cumulative effects discussion (FEIS pp. 3-261 to 3-289). The effects of all vegetation management practices on wildlife are discussed in the FEIS (pp. 3-212 to 3-289).

Public Interest #188: The Forest Plan should include a standard for pesticide application in high visitor use areas, rather than a guideline.

Sample Statement: PLRMP p. III-3: 2100 Environmental Management - Pesticide Use, Human Exposure - This guideline regarding application in high visitor use areas should be a Standard. (#329)

Response: We believe the referenced guideline adequately provides for public safety. Compliance with applicable guidelines is generally expected, but situations are anticipated where strict compliance may not be feasible or desirable. Guidelines should be followed except where circumstances in the field call for an adjustment. The need for that adjustment would be documented during project level development and environmental analysis (LRMP Design Criteria, p. 53). For example, NNIS can occur in high visitor use areas, and effective treatment in many cases can only occur during the growing season (i.e., leaf-on season) which generally coincides with periods of higher recreational use. Public notification would still occur (LRMP Design Criteria, 2100 Environmental Management – Pesticide Use, Notification, pp. 54, 56 and 57) which includes signing and contacting people in the area. People then have the option to avoid the treated area, if they choose. However, even if they contact the treated vegetation, the risk assessment shows that potential risks to human health are negligible (FEIS pp. 3-435 to 3-442; Appendix G pp. G1-1 to G1-4, G1-81 to G1-91, G1-135 to G1-142). In some instances ANF personnel may implement a temporary, short-term closure of a specific treatment area.

Public Interest #189: The Final EIS should include an analysis of the herbicide impacts to vegetation structure and composition and wildlife.

Sample Statement: An ecological [not exposure or toxicity] impact that needs to be assessed and which ANF has control over is the effect of herbicides on wildlife habitat. Table ES-2 shows a two to three fold increase in the use of herbicides, yet no evaluated ecological effects. Chapter 3 only describes these as 'temporary and short term,' with no lasting effects. It seems this use of herbicides removes "competing" vegetation to improve regeneration. Much of the competing vegetation includes shrubs like spice bush which are very important to migrants and also important for birds that nest in the sub-canopy [e.g., see Easton, W.E., and K. Martin. 200. Effects of thinning and herbicide treatments on nest-site selection by songbirds in young managed forests. *Auk* 119:685-694]. We would like to see an analysis showing how the vegetation structure and composition changes with predicted effects on wildlife, for each alternative. Certainly the altered shrub/sub-canopy will affect reproductive output of associated breeding birds there during one or more seasons, possibly resulting in abandonment of these areas for some time by some species. (#13)

Response: In the Direct and Indirect Effects section of Chapter 3 of the FEIS (pp. 3-215 to 3-217, 3-225, and 3-226), we have added discussion regarding the effects of herbicide treatment on vegetation composition and structure and on associated wildlife species. In summary, effects of herbicide application on wildlife are determined largely by the degree of dependence of the individual species on the woody and herbaceous vegetation affected by treatment. Many of these effects are short-term in nature, and considering most sites proposed for herbicide application will be followed by a removal cut within 5-10 years, long-term effects on wildlife will be determined largely by the dramatic changes in overstory vegetation following final harvest treatment (described in this same section). In addition, the effects from herbicide treatments are inherent in the Plant and Animal Habitat Cumulative Effects discussion section (FEIS pp. 3-261 to 3-289). Spice bush is not considered to be a species that competes with the establishment and growth of desired tree and herbaceous species (FEIS pp. 3-93 to 3-95). The primary competing species are ferns, grass, striped maple, and beech seedlings and root suckers. Project level decisions would consider whether there is a need to provide buffers around certain locations of a specific shrub species.

Public Interest #190: The Allegheny National Forest should consider that herbicides may impact soil fertility and that tree seedlings will not develop following herbicide application due to herbicide effects on soil.

Sample Statement: There may also be impact of herbicides on soil fertility. (#13)

Sample Statement: PAGE 3-102 DOUSING SOIL with chemical herbicides saying it will grow new trees is a lie and an oxymoron. It does not work. (#44)

Response: Soil fertility is generally defined as the ability of a soil to provide essential chemical elements or nutrients in sufficient quantities and proportions for plant growth (Brady, N, and R. Weil. 2002. *The Nature and Properties of Soil* 13th ed. Prentice Hall; New Jersey). The behavior of glyphosate and sulfometuron methyl in soil as well as other elements of the environment is covered in Appendix G1 (pp. G1-40 to G1-48 and G1-103 to G1-109). Glyphosate has a short persistence in soils and is primarily absorbed through foliage with less than 1% absorbed through the roots because glyphosate is quickly and tightly adsorbed by soil particles (Appendix G1 pp. G1-41 and G1-42). Once bound to soil particles, glyphosate is not available for plant uptake (Appendix G1 pp. G1-40 to G1-42). “When glyphosate reaches the soils...it is completely and rapidly degraded by microbiological activity” (Appendix G1 p. G1-42). Soil microflora degrades glyphosate to aminomethyl phosphonic acid. The principle decomposition end products are carbon dioxide, water, nitrogen, and phosphate (Appendix G1 p. G1-42). The average half-life of glyphosate in soils is 60 days. The half-life is shorter than 60 days in silt loam soils and longer in sandy soils. The behavior of glyphosate in soil has been tested in a wide range of environmental conditions, which bracket those found on the ANF. Based on these studies we expect the soil half-life on the ANF to be less than 60 days, with half-life in the litter of the forest floor to be less than 30 days. Glyphosate has not been found to leach in soil, and is not expected to do so on the ANF (Appendix G1 p. G1-43).

The behavior of sulfometuron methyl in soil is addressed in Appendix G1 pp. G1-103 to G1-106. Sulfometuron methyl is rapidly absorbed by foliage and by roots in treated soils (Appendix G1 p. G1-103). Microbial degradation is slow, and non-microbial hydrolysis and chemical degradation appear to be important mechanisms in the dissipation of sulfometuron methyl (Appendix G1 p. G1-104). Based on available research (Appendix G1 Tables 61 and 62 on p. G1-105), the half-life of sulfometuron methyl in ANF soils is expected to be less than 3 weeks (Appendix G1 p. G1-106). Treated soils can affect seed germination for short periods after application.

The potential impacts of herbicides on site quality and soil productivity are discussed in greater detail in Appendix G1 (pp. G1-43, G1-44 and G1-106). On the ANF, abundant tree seedlings, native shrubs and herbaceous plants develop during the first year after herbicide application, which indicates the treatment does not affect the viability of seed banks in the forest floor (FEIS p. 3-121). Recent research completed on the ANF found that herbicide application temporarily reduces the average number of species found, but 3 years after application the number of plant species returned to pre-treatment levels, and 5 years after application treated sites had higher species diversity and lower single species dominance in treated sites (FEIS p. 3-121). If previous use of the same herbicides on the ANF had caused disruption of soil fertility, it is logical that such effects would be seen in inhibited plant establishment and growth. The ANF monitoring report of FY 2001 (USDA-FS, 2004, pp. 31-34), reported that 73% of all the areas treated between 1987 and 1999 are more than 50% stocked with tree seedlings. Before treatment, almost all of these areas had very few tree seedlings present. These results indicate that herbicide use is not adversely affecting soil fertility.

Bromilow et al. (1996) noted no effects on soil fertility in repeated applications over 14 years – 1980 to 1993 – of glyphosate at 1.4 kg/ha based on assays for microbial biomass and crop productivity. From this and additional information in Appendix G2 (p. G2-33), we conclude that the proposed use of glyphosate will not adversely affect soil nutrient cycling.

Sulfometuron methyl is a pre-emergent herbicide and can affect plant germination for short time periods after application, but it has not been shown to interrupt soil nutrient cycling. SERA (2004) reports that sulfometuron

methyl at concentrations up to 1000 µg/g soil, had no effects on the microbial populations, and at soil concentrations ranging from 0.098 to 0.98 ppm no significant effects were observed on nitrate production, or cellulose, protein or starch metabolism. From this and the additional information in Appendix G2 (p. G2-42) we conclude that the proposed use of sulfometuron methyl will not disrupt soil nutrient cycling.

Public Interest #191: The Forest Service should avoid the use of pesticides.

Sample Statement: Pesticides are mentioned. There never has been the elimination of imported forest insect pest in the history of American Entomology. [The Hall Scale was destroyed by burning all of the dozen palm trees on which this pest was discovered, but that was not due to pesticides.] Biological control has the track record of reducing loss to tolerable levels or the threatened tree species was decimated or killed and chemical agents were unable to halt the damage. A Sub Rosa Agreement to avoid pesticides gives biological agents [predators and parasites] a more rapid reduction of the pest population. (#19)

Response: The term “pesticides” includes herbicides, fungicides, rodenticides and insecticides (see Appendix G3, p. G3-14). This comment seems to be referring to insecticides, which can be either chemical or biological. The LRMP provides for using integrated pest management methods (i.e., chemical, biological, silvicultural, etc.) to minimize or prevent the development of forest pest problems (LRMP pp. 15, 54, 93, A-3). These techniques are generally designed to reduce tree mortality or damage to acceptable levels, not to eradicate a forest pest. Between 1985 and 1995, ANF personnel successfully used insecticides (some chemical but primarily biological) to limit expected severe insect defoliation and to help reduce anticipated tree mortality/decline. Future selection of an appropriate technique(s) would follow appropriate analysis of potential effects, and it would consider current technology and knowledge of the particular pest at the time forest vegetation is threatened (FEIS pp. 3-109 and 3-110; LRMP p. 15).

Public Interest #192: The Final EIS should implement the use of an insecticide such as Bt when addressing both site specific and widespread defoliation.

Sample Statement: Use of an insecticide such as Bt approved for aquatic use is critical when addressing both site specific and widespread defoliation and our agency tenaciously supports this guideline. (#63)

Response: Bt would be one of a number of tools ANF personnel would consider using in order to respond to an outbreak of defoliators. In addition, see the response to PI #191.

Public Interest #193: The Forest Service should avoid the use of herbicides.

Sample Statement: Herbicides are mentioned. There are numerous scientific publications documenting the carcinogenic and/or mutagenic effects of the chemical. See: Schurr, et al. 1990 a New Method for Detecting Genotoxic Chemical in Water or Environmental Samples; Proc. National conference "Pesticides in the next Decade, pp 294-299. Also, Schurr et al. 1990 Genotoxicity of 22 Pesticides documented by Microtitration SOS Chromotest. International Journal of Toxicity Assessment 5: pp 1-5. Vincent Garry and seven coauthors published: 1989, 13 October, in Science p 251 "Human Genotoxicity: Pesticide Applicators" with documentation that workers spraying phosphine [and earlier sprayed other pesticides] suffered 106.6 times the chromosome breakage and genetic injury then control subject. Since control humans are likely to never have been exposed to pesticides from food, garden, yard and farm activities, this data is conservative. If the Forest Service Employees are exposed to pesticides in their workplace, any future cases of cancer or defective offspring would leave the Forest Service liable for damages. The best alternative is to avoid use of pesticides. (#19)

Response: The respondent cites 2 publications which describe methods for detecting genotoxic chemicals (including pesticides) in water. From the information provided in the letter, we are not able to locate the Schurr et al. 1990 reference regarding the Proceedings of the National Conference. Also we believe that the citation for Schurr et al. 1990 (published in Journal of Toxicity Assessment) is incorrect. The correct citation is Xu, H.H. and

K.M. Schurr. 1990 (see complete citation in ANF Appendix G1). However, because the publication dates are both 1990 and the titles suggest a common research effort, our assumption is that the proceedings contain method(s) similar to those presented in Xu and Schurr 1990. These publications describe the use of the SOS Chromotest method, a bacterial short-term genotoxicity assay. Although some pesticides tested positive using the SOS Chromotest, they do not include glyphosate or sulfometuron methyl. This assay, when used in screening chemicals for genotoxic potential, gives similar results as the more commonly used *Salmonella*/microsome assay (Ames test) (see ANF Appendix G1 reference Helma et al., Environ. Sci. Technol. 1996, 30, 897-907). The letter cites a third publication (see ANF Appendix G1 reference Garry et al., Science, 1989 Vol 246, Issue 4927, 251-255) which describes potential genotoxicity for fumigant applicators who, 6 weeks to 3 months earlier, were exposed to phosphine, a common grain fumigant. Because of these findings, the letter suggests that the use of pesticides should be avoided in the ANF.

The risk assessment process used in this EIS is well developed and is the same process used by EPA and other federal agencies for risk assessment relative to chemicals in the environment. We have added additional descriptive information to Appendix G1 (pp. G1-7 to G1-9) regarding the risk assessment process.

EPA required testing for carcinogens relies on a number of *in vitro* and *in vivo* assays to assess carcinogenicity. Tests for genotoxicity include four core assays:

- Bacterial mutation assay (Ames test)
- Mammalian cell mutation assay (L5178Y TK assay; CHO HGPRT)
- *In vitro* cytogenetic assay (metaphase analysis; human peripheral lymphocytes; CHO; CHL)
- *In vivo* Bone-marrow cytogenetic assay (micronucleus assay; rat; mouse)

For both glyphosate and sulfometuron methyl, the results of these assays were negative (see Appendix G1 pp. G1-33 to G1-35 and G1-99.) In addition, chronic bioassays in rats and mice showed no evidence of carcinogenicity (see ANF Appendix G1 reference US EPA 2004).

The ANF human health risk assessment evaluates glyphosate and sulfometuron methyl toxicity and exposure potential for a variety of worker and general public exposure scenarios using the risk assessment process described in EIS Appendix G1 (pp. G1-7 to G1-9) and the information above on carcinogen testing. As glyphosate and sulfometuron methyl are not classified as carcinogens by EPA, the reference dose was used to assess toxicity. To characterize glyphosate and sulfometuron methyl risk, an estimate of internal dose for each exposure scenario was compared to the reference dose. For all scenarios the estimated internal dose did not exceed the reference dose, often by a wide margin (see Appendix G1 pp. G1-75 and G1-131).

Finally, the reference to Garry et al., 1989 is not germane to the ANF human health risk assessment as this retrospective epidemiology study evaluates the potential for genotoxicity for phosphine applicators who are treating stored grain. This observational research only suggests a relationship between phosphine use and genotoxicity, and exposure to other pesticides cannot be ruled out. To support these findings additional research is necessary, i.e., controlled experiments in which exposure and internal dose are known. Also, because the fumigant phosphine is not structurally related to the herbicides glyphosate and sulfometuron methyl, the findings of Garry et al., 1989 have little relevance to herbicide use and risks to humans in the ANF.

Public Interest #194: The Forest Plan should require use of a pesticide labeled for aquatic use within 50 feet of perennial streams, lakes, impoundments, springs, seeps, intermittent streams, shallow ground water and saturated soil.

Sample Statement: We recommend that buffers apply also to shallow groundwater areas and saturated soils. This restriction applies to many pesticide product labels and makes sense in forest management in a sensitive environment. Small streams, in particular, are susceptible to drift. We believe that a 25-foot buffer is too narrow and suggest 50 feet unless a product labeled for aquatic use [for example Rodeo for a glyphosate product] is used in the 25 to 50 foot buffer area. The toxicity of sulfometuron is low enough for aquatic plants and animals that it should not be used within 50 feet of perennial streams, lakes, impoundments, springs, seeps, intermittent streams, shallow groundwater areas and saturated soil. This would reduce the risk of using a sulfometuron product. The cut surface treatment, which is not to occur within 10 feet of water, is a very selective treatment and is of minimal risk as described. (#62 and #63)

Response: In summary, based on the limited mobility of both herbicides and limited persistence in ANF soils, buffers are not needed for shallow groundwater areas or saturated soils since these herbicides are unlikely to enter the groundwater. Buffer standards and guidelines are listed in Section 2100, Environmental Management, Pesticide Use in the ANF LRMP (LRMP pp. 54 to 59) as well as in Appendix G2 (pp. G2-10 to G2-11, G2-55 to G2-59 and G2-67 to G2-70). The buffer for wet areas with standing water is 25 feet for air blast applications of 1 and 2 lb/acre of glyphosate and for 0.09 lb/acre of sulfometuron methyl. We believe these buffers are adequate to protect aquatic species. Glyphosate formulations and surfactants proposed for use on the ANF are labeled for aquatic use. The sulfometuron methyl formulation is labeled for use on intermittently flooded low lying sites when no water is present. The following discussion provides important supporting information.

The behavior of glyphosate and sulfometuron methyl in soil and groundwater as well as other elements of the environment is covered in Appendix G1 (pp. G1-40 to G1-48 and G1-103 to G1-109). For glyphosate, soil degradation is fairly rapid, and it adheres strongly to soil particles and does not have a tendency to leach (Appendix G1 p. G1-42). In aquatic systems, glyphosate is strongly adsorbed to both organic and mineral matter and is mainly degraded by microorganisms (Appendix G1 p. G1-44) and was shown to dissipate rapidly in standing water with half-lives of 1.5 to 3.5 days (Goldborough and Beck 1989 on Appendix G2 p. G2-46). We expect glyphosate to behave similarly in saturated and non-saturated soils, i.e. strong adsorption to soil organic and mineral matter with a rate of dissipation similar to that found in standing water.

The behavior of sulfometuron methyl in soil is reviewed in Appendix G1 (pp. G1-104 to G1-106). These pages include results from several field studies (see Table 62, Appendix G1, p. G1-105) that show the proportion of applied sulfometuron methyl remaining from 1 to 2 years after application ranged from 1% to 9% in Delaware, North Carolina, Oregon, Colorado, and Saskatchewan. In addition, Michael and Neary (1988) reported that residues of sulfometuron methyl dissipated from litter and soil rapidly after aerial application to a 445 ha Mississippi forested watershed and by ground application to a 4 ha watershed in Florida (application rate was 0.42 kg a.i./ha). In the soil profiles sulfometuron methyl was not detected below 30 cm and was not detected after 60 days (detection limit for soil was 0.020 ppm).

According to a study by Stone et al. (1993) reviewed by SERA (1998a) sulfometuron methyl and its metabolites are mobile in most soils; more so in sandy vs. loamy soils and less so in high organic matter soils and less so in soils at pH 6 and below. In field lysimeters with intact soil columns of bare sandy soils from the northern lake state forests and sulfometuron methyl applied at 42.5 g a.i./ha, the mean concentration in soil water was 0.5 µg/L at 10 cm and 0.4 µg/L at 20 cm and none was detected in soil water below 20 cm. By 80 days post-treatment most of the compound had been degraded or irreversibly absorbed into the upper soil layers. Mean concentrations detected from 80 to 130 days post-treatment were 0.5 µg/L at 10 cm, 0.4 µg/L, and 0.0 µg/L at 40 and 150 cm.

Based on this information, we conclude that sulfometuron methyl will be neither very persistent nor mobile in the types of soils found on the ANF because of the generally higher level of organic matter and the lower pH. The

layer of vegetation and litter present on the ground promotes infiltration into the soil. This decreases the likelihood of surface runoff of water which might contain chemical residues and increases the likelihood of the movement of this water and any chemical residue it contains into the upper-most portions of the soil. The high levels of organic matter in ANF soils will limit the movement (leaching) of sulfometuron methyl and accelerate its rate of decomposition. The half-life in ANF soil is expected to be less than 3 weeks. Applications should not be made to bare and/or compacted soils because runoff of this herbicide could possibly damage adjacent vegetation.

We expect sulfometuron methyl to behave similarly in saturated and non-saturated soils, i.e. strong adsorption to soil organic and mineral matter. We note that its dissipation rate in water is uncertain, but based on the information cited above and in detail in Appendix G1 (pp. G1-104 to G1-106), we conclude that there is no expectation it will be persistent and leach to groundwater.

All the glyphosate formulations proposed for use on the ANF are labeled for aquatic use. The surfactant constituents are all on either US EPA list 3 or 4B. List 3 indicates that there is unknown toxicity; for inerts where there was no basis for placing it on any of the other lists. List 4B indicates materials which are considered to be of minimal concern and for which there is sufficient information to conclude that the current use patterns in pesticide products will not adversely affect public health and the environment. See Appendix G1 pp. G1-2, G1-4, G1-13, G1-14, G1-36, G1-37 and G1-101 for more details on surfactants and inerts and the EPA list definitions. The Agency (US EPA) will continue to evaluate these chemical substances, as additional information becomes available, to determine if reclassification to List 1, 2, or 4 is appropriate. We note however that all the surfactants proposed for use on the ANF are also labeled for aquatic use.

The sulfometuron methyl formulation proposed for use is labeled for use on intermittently flooded low lying sites, seasonal dry floodplains and transitional areas between upland and lowland sites when no water is present and in marshes, swamps, and bogs after the water has receded. Herbicide drift is affected by application method, interception by vegetation, and wind; not stream size. Therefore buffers that are adequate to minimize adverse effects on the herbicides in larger streams will work equally well for small streams.

Based on drift analysis conducted by SERA (2003a) using the modeling program AgDrift, and reported on Appendix G2 pp. G2-67 to G2-70 (Off-site drift and buffers), wider buffers for sulfometuron methyl applied at 0.09 lb/acre are not needed. AgDrift modeling is done for bare ground as is often the case for agricultural fields with no intercepting vegetation. Similar bare ground applications are not expected to occur on the ANF, and sufficient forest vegetation will be present to intercept herbicide drift. The drift analysis done by SERA (2003a) as reported in Appendix G2 calculates the expected concentration of glyphosate in water 1 ft deep with buffers of 100, 50, and 25 feet. If these values are plotted and extrapolated to a buffer of 10 ft, the expected concentration in water is 0.012 mg/L. This is far less than the critical toxicity value of 2.57 mg/L and the water quality protection guideline of 0.7 mg/L. Extrapolating the SERA analysis to sulfometuron methyl, the calculated concentration in water with a 10 ft buffer at the 0.09 lb/acre application is 0.00028 mg/L. This is slightly greater than the critical toxicity value of 0.00021 mg/L for aquatic macrophytes identified in Appendix G2 Table 5, p. G2-47 and the water quality protection criterion of 0.00021 mg/L identified in Appendix G2 p. G2-68. The results of the ANF water monitoring program have not shown detectable residues of sulfometuron methyl in water (see Appendix G2 p. G2-69), and given the only slight difference between the predicted contamination (based on modeling) and the critical toxicity and water quality criterion, we conclude that buffers for the program will protect aquatic macrophytes, the most sensitive type of aquatic organism.

The risk characterizations shown in Appendix G2 Table 24 (p. G2-87) incorporate the critical toxicity values from Appendix G2 Table 23 (p. G2-86) with the expected aquatic exposure values to calculate the hazard quotients for glyphosate and sulfometuron methyl for federally listed and proposed threatened, endangered or sensitive aquatic animals at sulfometuron methyl rates of application of 0.09 and 0.19 lb/acre. Note that the SERA analyses reported here and in Appendix G2 are for airblast application, and SERA notes that the drift from backpack

applications are expected to be less, which would reduce the hazard quotient values reported in Appendix G2. Based on this analysis we conclude that the buffers listed in Appendix G2 (pp. G2-10 and G2-11) for glyphosate and sulfometuron methyl are adequate to protect aquatic species.

Public Interest #195: The Allegheny National Forest should limit herbicide application to hay-scented fern and prohibit application to club mosses.

Sample Statement: Back off on the use of herbicides. Limit herbicide application to hay-scented fern, leaving other species which are not so problematic, and which add to the beauty of uneven age stands, which are also important recreation areas. Eliminate herbicide application on club mosses, for the same reason. (#127)

Response: Local research and experience has shown that abundant ferns, striped maple, grass, and beech root suckers or seedlings limit the establishment and growth of desired tree seedlings and herbaceous species (FEIS pp. 3-92 to 3-95). A legacy of repeated and selective deer browsing has served to enhance this effect. Individual non-target plants or tree seedlings growing together with the target species may be injured or killed by herbicide application (FEIS pp. 3-119 to 3-122). However, treatments will be as selective as possible and yet still achieve the overall treatment objective (LRMP pp. 15, 54-59 and 32-45 and LRMP Appendix A pp. A-32 to A-45).

Club mosses are common on the ANF. Local experience since 1987 indicates that glyphosate applied at ANF rates has little effect on them, primarily due to the waxy protective coating on their foliage. Sulfometuron methyl causes some visible mortality or damage to the above-ground portion of these plants, however the underground stems (rhizomes) are less affected, enabling the above-ground portion to recover within a few years of treatment.

Elimination of understory interference permits a wider variety of plants to occupy the area than are present at the time of treatment (FEIS p. 3-121). Herbicide treatment is an important tool for both even-aged and uneven-aged management (FEIS p. 3-119; LRMP Appendix A, p. A-34) as well as for restoring and/or enhancing herbaceous plant species diversity in the long term.

Public Interest #196: The Forest Plan should require the aquatic formulation and refrain from using surfactants or carriers when herbicide use is anticipated around streams or wetlands.

Sample Statement: The DEIS describes the use of herbicides as a forest management tool. Glyphosate (the common ingredient found in Roundup) and sulfometuron methyl (common Oust) are two herbicides under consideration. It is important to consider effects on the aquatic community when spraying herbicides in the vicinity of a water body. Due to the toxic nature of carriers or surfactants usually used in conjunction with herbicides, we recommend these compounds not be used with either herbicide choice. Surfactants, or carriers, can be more toxic and persistent in the environment than the herbicide itself, and may have adverse indirect effects on aquatic life. Oust has limited use on or near aquatic areas, due to its potential toxicity to fish and potential for water contamination. We recommend that the Forest Service use the aquatic formulation of any herbicide chosen when herbicide use is anticipated around streams or wetlands. The aquatic formulations of glyphosate (Rodeo), or triclopyr (Renovate 3) are acceptable, less toxic alternatives, and recommended for use around aquatic areas. (#159)

Response: In summary, buffer standards and guidelines are listed in Section 2100-Environmental Management: Pesticide use in the ANF LRMP as well as in Appendix G2 pp. G2-10 and G2-11, G2-55 to G2-59 and G2-67 to G2-70. The buffer for wet areas with standing water is 25 feet for air blast applications of 1 and 2 lb/acre of glyphosate and for 0.09 lb/acre of sulfometuron methyl. We believe these buffers are adequate to protect aquatic species. Glyphosate formulations and surfactants proposed for use on the ANF are labeled for aquatic use. The sulfometuron methyl formulation is labeled for use on intermittently flooded low lying sites when no water is present. For additional information, see the sections of the detailed response to PI #194 that deal with glyphosate formulations, sulfometuron methyl uses, the potential for drift, risk characterization, and surfactants.

Neither this environmental impact statement nor the accompanying herbicide risk assessments evaluate the use of triclopyr for silvicultural treatments, wildlife habitat enhancement, heritage site restoration, vista development and maintenance, or non-native invasive species treatment. Due to the high cost of evaluating an herbicide, we have limited the number of herbicides considered in detail to those considered most appropriate for the broadest range of uses. The LRMP does not propose using triclopyr for these types of vegetation management.

Public Interest #197: The Forest Plan should emphasize targeted herbicide application to avoid incidental spray drift whenever possible.

Sample Statement: To avoid incidental spray drift during application of herbicides, we recommend targeted application, including painting the surfaces of freshly cut stumps and stubs, injecting through the bark of woody plants, making cuts with a hatchet and treating, girdling and treating, or basal bark and stem treatment methods, wherever possible. (#159)

Response: See response to PI #195. Herbicide treatments will be as selective as possible and yet still achieve the overall treatment objective (LRMP pp. 15 and 54-59; LRMP Appendix A, pp. A-32 to A-45). Note that available methods include manual ground (backpack) and cut surface treatments that are very selective. Decisions about the particular type of treatment to use on a specific site will be made when individual projects are proposed and analyzed. Buffers are also a consideration.

Public Interest #198: The Final EIS should consider current science regarding the toxicity of herbicides.

Sample Statement: The Draft Plan Ignores the Current Science On Toxics of Using Herbicides On The ANF. - The science on herbicides that the FS cites is 20 years old and unacceptable. - The FS states that it will continue to use herbicides even though the authorized use expired under the 1986 Management Plan. - Herbicide use must end on ANF public lands. - New research on two different southeast National Forests confirmed herbicides are drifting into streams and waterways. - The findings of Dr. Rick Relyea's scientific research on Roundup causing population crashes in three species of frog tadpoles with predators present in the water must be incorporated into the forest management plan revision. (#295)

Response: Appendix G of the FEIS contains an extensive, up to date, and exhaustive analysis of the potential risks to human health, wildlife, and aquatic species from the proposed use of herbicides on the ANF. We reject the implication that research published previously is incorrect. Unless more recent research shows results that conflict with older findings, the older findings should be considered valid, within what ever the limitations of the methodology of the day were.

Note that Appendix G1, p. G1-5 and Appendix G2 p. G2-16 refer to previous analyses done that are pertinent to the management of vegetation on the ANF (it states that four risk analyses preceded the current one). The current human health and environmental risk analyses (Appendix G1 and G2) rely heavily on analysis completed by SERA for the US Forest Service and use up to date research. The SERA analysis for glyphosate was completed in 2003, and the sulfometuron methyl document was completed in 2004. On Appendix G1, pp. G1-9 and G1-10 and Appendix G2, p. G2-17 we indicate that scientific literature database searches were conducted to locate information published after the SERA documents were completed. Our literature searches for glyphosate focused on the time frame from 2002 through July 2005, and for sulfometuron methyl the searches focused on the time frame from 2003 through July 2005. Note the number of references in the reference sections of Appendices G1 and G2 that are less than five or ten years of age. For example, Appendix G1 includes such references as Brammer 1996, Battaglin et al. 1999, De Roos et al. 2004, Durkin and Diamond 2002, El-Gendy et al. 1998, Garry et al. 2002, and Lin and Gary 2000. Appendix G2 cites Bengtsson et al. 2004, Chen et al. 2004, Connors and Black 2004, Haughton et al. 2001a, and 2001b, Howe et al. 2004, and Thompson et al. 2004.

Both the Proposed and the Revised ANF LRMP and supporting documents take a comprehensive and up-to-date look at the use of herbicides on the ANF, including the types of uses, potential benefits and effects, standards,

guidelines, mitigation measures and the results from monitoring previous use (LRMP pp. 15, 21 and 54-59; LRMP Appendix A, pp. A-32 to A-45; FEIS pp. 3-33 to 3-36, 3-40, 3-41, 3-45, 3-46, 3-92 to 3-95, 3-119 to 3-122, 3-126, 3-145 to 3-159, 3-172, 3-173, 3-215 to 3-217, 3-224 to 3-226, 3-241, 3-246, 3-247, 3-263 to 3-295, 3-433 to 3-446, Appendix G of the FEIS). The ROD (p. 23 and 24) provides the rationale for authorizing ANF personnel to consider, in future site-specific analyses, the use of glyphosate and sulfometuron methyl for specific types of vegetation management.

The written comment mentions that “new research on two different southeast National Forests confirmed herbicides are drifting into streams and waterways”, but insufficient information was provided for us to determine the details and to evaluate the information in relation to the conditions found in Pennsylvania forests and management plans proposed for the ANF. It is not known which herbicides were applied or how the herbicides were applied (aerial vs. back pack or air blast, etc.). The buffer strategies proposed in this ANF program are based on the drift analysis conducted by SERA (2003a) using the modeling program AgDrift, and reported on Appendix G2 pp. G2-55 to G2-59 and G2-67 to G2-70 (Off-site drift and buffers). Refer to the response to PI #194 for additional information on this topic.

We note that the water monitoring programs conducted on the ANF in 2003 and 2004 have not found detectable herbicide residues in water and have found little or no damage to vegetation outside of the intended treatment area (Appendix G2 pp. G2-56 and G2-69). Monitoring in 1987, 1988 and 2002 showed no detectable concentrations of glyphosate in water samples (Appendix G2 p. G2-56) and in 1990 and 2002 showed no detectable concentrations of sulfometuron methyl in water samples (Appendix G2 p. G2-69).

Appendix G2 (pp. G2-27 and G2-28) has incorporated recent research conducted and published by Dr. Relyea (Relyea 2004, 2005 a, b, c). As indicated there, these studies use formulations (Roundup) that contain POEA surfactant. This surfactant has been found to be more toxic than glyphosate (SERA 2003b). POEA is not part of any glyphosate formulation proposed for use on the ANF (Appendix G1 p. G1-2) and therefore these studies are not applicable to the proposed treatments on the ANF.

Public Interest #199: The Forest Plan should include a standard limiting herbicide application near resistant stems, including beech stems, rather than a guideline.

Sample Statement: The Guideline limiting herbicide application near resistant beech stems should be a Standard. A similar Standard should be established for foliar application. Resistant stems of species affected by pests or disease should be considered a precious resource subject to stringent protection. (#329)

Response: It is our expectation that guidelines such as this will be followed, except where site-specific conditions in the field indicate that an adjustment is needed. The need for the adjustment would be documented. For additional information, refer to the response to PI #188.

We feel the cut surface treatment guidelines (pp. 55 and 56 of the LRMP) provide adequate protection of potentially resistant American beech while assuring some flexibility for field personnel to adapt this technique to local conditions. Field experience in West Virginia (Kochenderfer 2006, personal communication) indicates the size of the buffer actually varies based on the diameter of the standing tree needing protection, with larger trees requiring a larger buffer zone. The buffer distances listed in the guidelines are conservative and are based on the largest trees requiring protection.

Neither a similar standard nor a similar guideline would be appropriate for foliar treatment. Often larger diameter, potentially resistant beech trees and susceptible beech trees are very close to each other in field situations. Consequently beech root suckers and seedling origin stems from both potentially resistant as well as from susceptible trees grow intermingled below their canopies. Local field experience shows that foliar treatment of beech seedlings or saplings effectively removes them, but it rarely affects the larger parent trees. Larger healthy beech trees left uncut typically produce numerous root suckers and seedlings. An effective method to encourage

the development of potentially resistant beech is to cut the susceptible larger trees, allow time for them to sprout, and then apply a foliar spray and therefore remove all of the intermingled susceptible and potentially resistant seedlings and saplings. The larger potentially resistant beech trees still standing will produce additional root sprouts and seedlings which can then develop with little competition from stems of susceptible beech trees. We have added more information regarding this to the FEIS (p. 3-120) and the LRMP (LRMP Appendix A, pp. A-36 to A-41).

Public Interest #200: The Forest Plan should consider the potential effect of herbicide treatment on the carbon dating process used to determine the age of archaeological artifacts.

Sample Statement: Another area of concern is the selective use of herbicides used on earthworks, cultural sites, and other archaeological sites. Herbicide use may alter carbon dates, carbon dates should be obtained prior to herbicide treatment of known sites. ANF should work on a process to test the site in consultation with appropriate SNI representatives. (#503)

Sample Statement: The environmental impact study needs to address the application of herbicide in relation to unknown cultural sites and the possibility of carbon contamination. While Cultural Resource Surveys are generally done in advance of most application and the forest has been surveyed, this hypothetical should be addressed as a way to indicate an understanding by the ANF of the potential interaction by investigators with future archaeological sites. (#503)

Response: We have added a standard in the LRMP (Part 3, Design Criteria, 2360 standards, p. 62) that calls for consultation with appropriate representatives of the Seneca Nation of Indians (SNI) before making a decision on any activities within the vicinity of inventoried sites culturally sensitive to the SNI.

The following information is derived from Minnesota State University's web site http://www.mnsu.edu/emuseum/archaeology/dating/radio_carbon.html (accessed on January 24, 2007). For more detailed information, see Appendix G2 (pp. G2-89 to G2-91).

Radio-carbon dating is a method of obtaining age estimates on organic materials for archaeological samples as old as 50,000 years. Radiocarbon determinations can be obtained on wood; charcoal; marine and fresh-water shell; bone and antler; peat and organic-bearing sediments, carbonate deposits such as tufa, caliche, and marl; and dissolved carbon dioxide and carbonates in ocean, lake and ground-water sources. This method is based on measuring the amount of radioactive carbon (C^{14}) relative to the amount of the most abundant form of carbon (C^{12}).

A measurement of the radiocarbon content of an organic sample will provide an accurate determination of the sample's age if it is assumed that (1) the production of radiocarbon by cosmic rays has remained essentially constant long enough to establish a steady state in the C^{14}/C^{12} ratio in the atmosphere, (2) there has been a complete and rapid mixing of radiocarbon throughout the various carbon reservoirs, (3) the carbon isotope ratio in the sample has not been altered except by radiocarbon decay, and (4) the total amount of carbon in any reservoir has not been altered.

In the vast majority of cases assumptions 1, 2, and 4 are known to be satisfied. Concern has been raised about Assumption 3 for sample materials from the ANF. The issue is potential contamination of samples with chemicals associated with the use of herbicides thereby violating assumption 3 by artificially changing the carbon isotope ratio. This would occur if the sample material contains herbicide related carbon compounds, which would change the ratio of C^{12} and C^{14} , resulting in an error in estimating the age of the sample material.

Most artifacts found on the ANF are buried under a minimum of one inch of forest litter and humus or under varying depths of soil (from zero up to as much as ten feet). Carbonized wood is expected to be the most frequently occurring culturally significant artifact found on the ANF and may be found under varying amounts of

forest debris and/or soil. Given the limited movement and persistence of glyphosate and sulfometuron methyl, it is not likely they will contaminate materials of potential interest for carbon dating. Any contamination that did occur would alter the C^{14}/C^{12} ratio to such a minute degree that it would not result in an error in dating that would exceed the uncertainty inherent within the method. In the event samples for dating are collected in an area sprayed within the 2 previous years and it is believed that the sample material could have been exposed to direct spray, the carbon dating laboratory should be notified so they can take special sample preparation procedures to rinse the samples with appropriate solvents to remove any such residues.

Public Interest #201: The Final EIS should discuss the potential effects of herbicide use on medicinal plants and the Allegheny National Forest should collaborate with the Seneca Nation of Indians to identify and protect cultural medicinal plants.

Sample Statement: The plan should address the potential effects of herbicide use on medicinal plants within the environmental impact study. ANF should consult with appropriate representatives of the SNI to develop and identify specific cultural medicinal plants, and then indicate within the plan how to limit the introduction of herbicide on these plants or in areas where these plants grow. (#503)

Response: Medicinal plants are vulnerable to the herbicides proposed for use on the ANF just as are most other plant species present on the ANF. ANF personnel are prepared to consult with appropriate representatives of the SNI to identify those species of plants that are culturally significant medicinal plants and conservation measures for them. The potential impacts of future management activity on them, as well as the identification of appropriate mitigation measures, would most appropriately occur within a site-specific context when future project level proposals are evaluated.

Note that collection (personal or commercial) of special forest products, which includes medicinal plants, is based on management area suitability (Table 12, p. 37 in the LRMP) as well as conformance with applicable authorities and sustainability analyses (LRMP, 2400 goal on p. 14; also the 2400 guideline on p. 71).

3.9 Habitat

3.9.1 General

Public Interest #202: The Allegheny National Forest should promote a diversity of flora and fauna.

Sample Statement: I think that diversity of flora and fauna is important. To have just a pine forest, which is up over the hill from where my cabin is, they harvested that and will likely plant the same Red Pine or Austrian Pine...I think that forest should be diverse with conifers and deciduous. (#379)

Response: The ANF agrees that diversity is important and as a result includes forestwide goals and objectives related to providing a diversity of forest conditions (LRMP pp. 14, 15, 19, and 20), as well as specific design criteria that call for the retention of conifer and unique plant and animal communities across the landscape (LRMP pp. 63-89). See PI #211 for further discussion on forest diversity.

Public Interest #203: The Allegheny National Forest should designate management areas based upon landtype associations.

Sample Statement: Except for use by wildlife biologists, it appears that ecological landtype scales and process were not used in the FLMP planning process? Executing the FLMP is based on implementing the project work at the appropriate scale...When the planning process was in the fact gathering stage it was suggested that Management Areas formation be assisted by use of Landtype Associations...Here is the potential impact by not utilizing some of this Ecological Classification, Monitoring, and Inventory

information: Landtype Associations (LTA)...212Ga2, 212Ga3, 212Ga5, 212Ga9, and 212 Ga11 all have unique ecosystem characteristics that may affect how the plan would be implemented and what expected outcomes may be. (#214)

Response: The ANF agrees that LTAs are useful particularly at the project scale. The LRMP uses the same basic structure of management areas from the 1986 Forest Plan (see FEIS Chapter 2 for further MA discussion). Management areas were not designated or realigned by landtype associations at this time and scale. Management areas are considered to be broad scale. However, project design and implementation considers LTA and ELT data for design and implementation of projects within the different management areas that may have unique ecosystem characteristics which may be impacted from management activities. In addition, see response to PI #69.

3.9.2 Forest Types

General

Public Interest #204: The Final EIS should address how forest diversity will change as a result of the indicated harvest rate on land suited for timber harvest.

Sample Statement: The draft analysis summary indicates, tentatively, suitable forest land of 463,000 acres, with 9 percent of the youngest aged class in zero to 30 years. That calculates to a 100 percent harvest at 330 years. What trees will be in harvest condition at 330 years old? Instead of a diverse ecosystem will we end up with a single species forest...What is the impact of the Allegheny National Forest's ecosystem and multi-use mission with a harvest cycle of 330 years? (#412)

Response: The response to PI #120 provides discussion regarding the timber suitability analysis. Please note that the acres of land suited for timber production vary by Alternative.

The LRMP does not imply a harvest cycle of 330 years. The LRMP includes a blend of even-aged, uneven-aged and no active vegetation management to achieve desired vegetation conditions at a landscape scale. The concept of rotation age is applicable to areas managed using the even-aged silvicultural system. The minimum final harvest rotation ages for even-aged regeneration methods are shown in Table 22 of the LRMP (LRMP p. 67).

Cumulative acres regenerated by silvicultural system and management area for lands that are part of the suited land base are displayed in Table 3-33 (FEIS p. 3-153). Note that during the next 60 years, in Alternative Cm 110,300 acres would be regenerated through even-aged management, and 17,100 acres through uneven-aged management (a total of 25 percent of the ANF regenerated). Outcomes in terms of forest age class distribution and forest types are displayed on p. 3-139 (Table 3-28) and p. 3-134 (Table 3-26) of the FEIS.

Currently, 8 percent of ANF forested land is in the 0-20 year age class, 6 percent is in the 21-50 year age class and 26 percent is in the 51 to 80 year age class for a total of 40 percent of the ANF that is younger than 80 years old (FEIS Table 3-20, p. 3-89). For Alternative Cm, the Summary of the FEIS, Figure ES-2, and FEIS Table 3-28 (FEIS p. 3-139) projects that in the year 2060, 33 percent of ANF forested land will be less than 80 years old, 40 percent will be 81 to 140 years old and 27 percent will be over 140 years old or multi-aged.

With regard to tree species health or tree species composition 330 years from now on lands not regenerated between now and then, though we can not say for certain what will happen, we believe that substantial changes are likely to occur to forest structure, composition, and health in the absence of management. Forest types that are considered part of the northern hardwood group are anticipated to slowly transition towards tree species tolerant of shade, such as American beech, hemlock, and sugar maple. This has long term forest health implications, since all of these species are at risk of decline and mortality. Where oak dominates, a slow transition towards red maple and other hardwoods is anticipated over the long term (FEIS pp. 3-130 and 3-166 to 3-169).

Oak

Public Interest #205: The Forest Plan should provide for the regeneration of oak through active management to benefit the local economy, aesthetics and wildlife.

Sample Statement: Oak trees in the Allegheny National Forest are not being managed or regenerated effectively due in part to the management strategies that are implemented where these trees are located. There are approximately 70,000 acres of oak trees in the Allegheny National Forest. Roughly 35,000 of these acres are in areas that preclude the effective management of oak trees. For example, a large percentage of these acres are in Wilderness Areas, Remote Recreation Areas, or National Recreation Areas where harvesting is administratively prohibited. The oak trees will not regenerate absent active management...As a consequence, the oak tree population within the Allegheny National Forest will decrease dramatically...Therefore, the Proposed Plan must be rescinded and revised so that areas where large quantities of oak trees represent and where harvesting is possible are designated as areas that can be managed in a manner that ensures adequate harvesting and regeneration of oak and prevents the overall aging and mismanagement of the species. (#484)

Sample Statement: The biodiversity of the Hardwood forests should not be ignored. Just the flora biodiversity alone should be enough to convince decision makers that sustainable management strategies for the Hardwoods are the only real responsible course of action for the National Forest Service on the ANF. The preferred alternative places about half of the Oak Hardwood forest into Wilderness study, promotion of biodiversity should convince us that modified management is the wise course of action rather than Wilderness designation...Among the tree species found in the Oak Hardwood forest are some rare tree species, such as Butternut. Any management decision that negatively affects those hardwood species seems to violate certain environmental laws designed to sustain endangered and threatened species. A measured investigation of those forests then will provide forest scientists with the information needed to protect those rare tree species. Wilderness designation will destroy the habitat necessary for sustaining those shade intolerant tree species. (#438)

Sample Statement: Shift some oak heavy acreage from unmanaged areas into MA 3.0. We specifically recommend shifting the northern portion of the acreage located east of PA Route 321 from the Chestnut Ridge Wilderness Study Area to MA 3.0.-Amend Alternative C to shift certain oak heavy portions of MA 2.2 acreage to MA 3.0 recommended areas include: (a) portion of the MA 2.2 acreage located south of PA Route 666 in the southwestern region of the ANF; (b) portions of the area north of PA Route 59, along the eastern shore of the Allegheny Reservoir; (c) portions of the MA 2.2 acreage located south of PA Route 3002, in the southern region of the ANF. (#268)

Response: We share your concern regarding the need to sustain the oak forest type on the ANF. It provides benefits in a number of ways, including vegetation diversity, forest products, wildlife habitat and food, recreation, and watershed uses.

Even-aged management is permitted in oak types in nearly all Management Areas that are considered part of the suitable landbase for scheduled timber production, including MAs 1.0, 2.2, 3.0, and 6.1 (see LRMP Table 21, p. 66 and MA 1.0, 2.2, 3.0, and 6.1 design criteria for 2400 Vegetation in the LRMP, pp. 104, 111, 115 and 128).

Table 2-3 in the FEIS (p. 2-57) shows the percent of oak allocated to each dominant silvicultural system. Table 10 of the LRMP displays the suitability of various harvest activities in each MA (see LRMP p. 35). Scheduled timber harvest management is appropriate on 49 percent of the oak type, salvage and reforestation activities are permitted on an additional 45 percent of the oak type to sustain forest health, respond to natural catastrophes, restore forest cover, or to achieve recreation or wildlife objectives, and harvest or reforestation activities are precluded on 6% the oak type. In addition, see p. 3-130 of the FEIS. Management Areas that exclude any type of harvest activity include wilderness (5.1), wilderness study (5.2), scenic areas (8.3), and the research natural area (8.5). Harvest activity is considered inconsistent with the desire for a relatively undisturbed and naturally evolving forest landscape and/or with the legislation that established these areas. Page 3-134 of the FEIS displays the forest type

outcomes anticipated in decades 1, 2, and 6 of Forest Plan implementation, including the amount of oak that would be sustained on the landscape in each of the Alternatives.

For information regarding the final location of MA 2.2, see section 2.2.2 of the FEIS, Changes to Alternatives Between DEIS and FEIS. This details the adjustments that were made to MA 2.2, including shifting some oak stands to MA 3.0 in response to public comments on the PLRMP.

See the ROD, pp. 15-28 for MA allocation rationale and p. 24 for a discussion on oak.

Public Interest #206: The Forest Plan should maintain the oak forest type on its current acreage.

Sample Statement: On page 1-7 the forest indicates a loss of oak in areas of inactive management. The loss of oak cannot continue. On page 3-73 the DEIS states the forest has 73 M acres oak type. This is a decrease from the 91 M acres estimated in the 1986 Plan, and a further decrease from the 81 M acres in the 2000 Plan amendment. The loss of oak from 17 to 13 % (page 3-203) cannot continue; it is another loss to wildlife. The forest needs to maintain the oak as it is being lost on the adjacent private lands when harvested. (#216)

Response: The differences pointed out in your comment regarding the total acres of oak on the ANF for the most part result from improved information in 2006 about how much forest and non-forest land and how much oak exists on the ANF, not from an actual substantial decrease in the oak type.

As you point out, the 1986 Forest Plan estimated there were 93,000 (91 M projected by 2016) acres of oak present on the ANF in 1980 (USDA-FS 1986a FEIS, Table 4-25, p. 4-94). Assembling forest type acreages was one of the first steps completed when Forest Plan development began in 1980. Field collected plot data was available for 78 percent of the land area, but some of the data was of questionable accuracy due to the age of the data, use of poor sampling techniques, and errors that occurred when data base management systems had changed. For the remaining 22 percent of the area, forest types were estimated based on aerial photo interpretation. (USDA-Forest Service, 1995a, p. 22) Since much of the oak type occurred in areas with little active vegetation management, very little plot data was available for it.

The FEIS for Threatened and Endangered Species on the ANF (USDA-Forest Service, 2000f, p. 3-53, Table 15) shows a little over 81,000 acres (16 percent of ANF land) in oak and a little over 22,000 acres of open land or water (4 percent of ANF land). However, this information precedes the intensive effort made during FPR to more accurately identify acres of non-forest land throughout the ANF as well as forest types in areas with little active vegetation management (i.e., wilderness, national recreation areas, etc.).

The FEIS (Table 3-18, p. 3-85) shows 75,400 acres of oak or 16% percent of ANF forested land. Please note that analysis during Forest Plan Revision reflects there are now 53,400 acres of non-forested land. This increase results from improved mapping techniques (GIS) and improved inventory of openings, forest roads, water, oil and gas well pads, and other facilities (FEIS, p. 3-392).

See the response to PI #205 for information on the ANF strategy to regenerate the oak type.

Public Interest #207: The Allegheny National Forest should use fire to a higher degree than was proposed in the Alternatives to maintain oak.

Sample Statement: There are several compelling reasons that the Oak Hardwoods and the Allegheny Hardwoods should be protected through aggressive management strategies. Native American use of fire promoted the hardwoods over the course of several thousands of years. I draw attention to two references, first; Native American influences on the forest composition of the Allegheny Plateau, northwest Pennsylvania by Bryan Black, Charles Ruffner & Marc Abrams, & second; America's Ancient Forests: From the Ice Age to the Age of Discovery by Dr. Thomas M. Bonnicksen. Both references, with a multitude of other references

point at a direct relationship between Native American land use practices and the proliferation of Hardwood forests. Rather than repeat what the forest scientists already know regarding the areas' historic forests and the impact by Native Americans, I assume that proper attention and weight is being given to the scientific data and conclusions. There is a historic precedent to promote and sustain these Hardwoods. Oak Harwood forests need active management to achieve sustainability. Fire should be utilized to a much higher degree than proposed in any of the alternatives. (#438)

Response: We concur that fire is an important management tool that can be used to help develop competitive oak tree seedlings necessary to help sustain the oak vegetation component over the long term on the ANF (LRMP Appendix A, pp. A-13 to A-15 and A-32; FEIS pp. 3-78, 3-80, 3-81, 3-125, 3-130, 3-157, 3-165, and 3-166). While prescribed fire does play a substantial role in helping to sustain the oak forest type, it does not play a substantial role in helping to sustain the other forest types. Active management, particularly even-aged, does help to sustain oak.

Table 2, p. 22 in the LRMP displays prescribed burning activity for treating hazardous fuels, for maintaining wildlife openings, and that necessary to develop competitive oak seedlings as part of silvicultural prescriptions that include regularly scheduled tree harvesting and stand regeneration (i.e. Management Areas 1.0, 2.1, 2.2, 3.0, and 6.1; see LRMP Table 10, p. 35). It does not include prescribed burning that future individual project analyses determine is necessary to help develop oak seedlings in areas suited for prescribed burning (see LRMP Table 12, p. 37) where management objectives preclude regularly scheduled timber harvest (see Table 10, p. 35). That acreage will be determined when site specific analyses are prepared during LRMP implementation.

As noted on p. 24 of the ROD, ANF oak forests are ecologically important, and the ANF emphasizes oak restoration through a combination of timber harvest and fire.

Allegheny Hardwood and Northern Hardwood

Public Interest #208: The Final EIS should clarify the origin of the Allegheny hardwood forest type.

Sample Statement: The Draft Plan Is An Attempt To Redefine The Vegetative Classifications For PA Forests By Defining 'Allegheny Hardwoods' As Being 50% Or More Black Cherry, As A Distinct Forest Type. If not perpetually disturbed by man, this so-called 'forest type' would mature to become a northern hardwood forest. Allegheny Hardwoods is a false forest type and is simply an early succession age-class and if not for perpetual clearcutting and herbicide use would not exist, except for natural windthrows. This would be very localized and not constitute a distinct forest type. (#295)

Response: Forest types are defined by the relative abundance of the dominant tree species comprising a forested stand. A forest cover type is defined as a category of forest defined by its vegetation (particularly its composition) and/or locality (environmental factors), or classification of forestland based on present occupancy of an area by tree species (Eyre 1980, pp. 1-4). As noted by Eyre, because of difference in concept, there is a major difficulty in relating SAF definitions to classifications based on potential natural vegetation. The SAF forest types describe present forest cover. The Allegheny hardwood or cherry-maple type (type 28 of the Society of American Foresters) has long been recognized as a distinct forest type, and covers about 12 million acres in the Allegheny Plateau and Allegheny Mountain sections of New York, Pennsylvania, Maryland, and West Virginia (Marquis and Gearhart 1983 p. 137). It is considered a subtype of the broader northern hardwood or beech-birch-maple forest type that spans the northern portions of the entire eastern United States from New England to the Lake States (Marquis 1994 p. 5), but on the Allegheny Plateau it has a different distribution and relative abundance of tree species that comprise it.

The distinct Allegheny hardwood type has been recognized by the scientific forestry community, including the Society of American Foresters since at least the 1940s:

- Hough and Forbes (1943) recognized the Allegheny hardwood –Hemlock type as resulting from historic logging practices, and mapped its distribution on the Allegheny Plateau.
- Ecologist Lucy Braun (2001, first edition 1950, pp. 393-394) recognized the Allegheny Hardwoods-Hemlock forest type as comprising a portion of the Northern Appalachian Highland Division (Allegheny Section) of the Hemlock-White Pine-Northern Hardwoods region.
- The Allegheny hardwood type, dominated by black cherry, is recognized within the northern unglaciated Allegheny Plateau Section (212G) as occurring due to historic logging practices between 1890 and 1930 (USDA-FS 1994 pp. 14-10 to 14-11).
- Marquis (1990, p. 596 in *Silvics of North America, Agricultural Handbook 654*) noted that northern hardwood stands that contain large amounts of black cherry are recognized as a separate forest type: Black Cherry-Maple (Society of American Foresters Type 28).
- Cherry/ash/yellow poplar (Allegheny hardwoods) are defined as a FIA (Forest Inventory and Analysis) forest type (code 802), as is black cherry (type 803) (USDA-FS 2005b).
- Collins and Pickett (1982) recognized the Allegheny hardwood type while conducting their research on the Allegheny Plateau.

The Allegheny hardwood forest type was recognized on the ANF as early as 1977 (USDA-FS 1977, pp. 5-6). The 1986 Forest Plan defined the Allegheny hardwood forest type as containing more than 25 percent of the basal area in black cherry, white ash, and yellow poplar. Following Forest Plan implementation, ANF personnel recognized the need to adopt the forest type structure established within the Eastern Region (R-9). In 1990, personnel began using 29 forest types that more correctly represented the overstory forest vegetation on the ANF. To be typed as a single species forest type, 50 percent or more of the basal area in the stand must be composed of that species. To be typed as a multiple species forest type, such as the Allegheny hardwood type, the combined basal area of the dominant tree species (e.g. black cherry, white ash, and yellow poplar) associated with the type must exceed 50 percent of the total stand basal area (USDA-FS 1995a, p. 23). This detailed forest type system more closely reflects management limitations, seedling development potential, regeneration requirements, shade-tolerance, and species diversity for the ANF.

The background and historical perspective of the affected environment portion of the forest vegetation section (3.3.1) of Chapter 3 of the FEIS (p. 3-81) discusses the history and origin of forests comprising the ANF today. About 250 years ago European settlers began arriving in the area that is now the ANF. From around 1890 to 1930, widespread logging and settlement changed the landscape. When the ANF was established in 1923, nearly all of the land was devoid of the original pre-settlement forest. The extensive timber harvesting, subsistence agriculture, and uncontrolled fires that occurred 75 -115 years ago created a generation of even-aged stand conditions on the ANF that are now in the mid-structural stage (50-140 years old).

Turn-of-the-century cutting brought about dramatic changes in the species composition of the ANF. A shift to shade-intolerant species occurred in many stands. Much of the ANF is now dominated by even-aged black cherry, red maple, beech, sugar maple, oaks, and other tree species. These species are all part of the broader northern hardwood type described by Marquis (1994 p. 5), but the relative abundance of individual tree species has changed following this series of events that occurred about 100 years ago. Black cherry is a component of many forest types; northern hardwood stands that contain large amounts of black cherry are recognized as a separate type.

We agree that Allegheny hardwoods would trend towards more tolerant and intermediately tolerant forest types such as upland and northern hardwoods in the absence of management, and this effect is described in the FEIS (see pp. 3-126 to 3-131).

Public Interest #209: The Allegheny National Forest should retain the timber age classifications used in the 1986 Forest Plan.

Sample Statement: The plan must return to the timber age classification that serves the current plan. Moving mid seral stage forward 40 years (110 to 150) and likewise late seral stage (110+ to 150+) is detrimental to Allegheny hardwoods, the species that adds value and uniqueness to the ANF. DCNR studies indicate the median commercial rotation age of Allegheny hardwoods is 90 years with a maximum of 120 years. The Summary states on page ES-14, Allegheny hardwoods are not likely live in stands greater than 120 years old. Advancing the mid seral state by 40 years and creating a new threshold for old growth at 150+ years favors longer lived species such as Northern hardwoods, which ironically and tragically are under attack by disease and infestation. (#462)

Response: Structural stages are based on the structural characteristics of forest vegetation on the ANF, and were estimated using reference condition modeling based on historic disturbance regimes for the ANF (Nature Conservancy, USDA Forest Service and Department of the Interior. LANDFIRE Rapid Assessment Modeling Manual, Version 2.1. January 2005. Boulder, CO. 72 pp.). The structural stage definitions incorporate new science available since the 1986 Forest Plan on natural disturbance regimes of the Allegheny Plateau (e.g. Abrams and Orwig 1996; Ruffner and Abrams 2002, 2003), and are a way to describe forest vegetation based on stand development processes (Oliver and Larson 1996, pp. 148-159). Structural stage definitions are based on structural characteristics (size of dominant tree species and percent canopy closure, see Table 3-43 on p. 3-185 of FEIS), and we have assigned age ranges where we estimate early, mid and late structural characteristics will develop in forest vegetation on the Allegheny Plateau.

We acknowledge that black cherry trees, a primary species comprising the Allegheny hardwood type, are shorter lived than other species. Page ES-14 of the DEIS Summary states Allegheny hardwoods over 120 years of age run a greater risk of mortality, as the black cherry trees in those areas begin to have an increasing likelihood of dying. However, some uncertainty exists regarding the maximum life span for black cherry trees on the Allegheny Plateau (as opposed to the rotation age, which is based on culmination of mean annual growth increment), and at what age substantial loss of product value occurs. While Marquis (1990) suggests that beyond age 80 to 100 years, diameter growth slows and mortality of black cherry increases, others (Parker and Merritt 1995) recommended a rotation age of 70 to 90 years old for black cherry, with a maximum rotation age of 250 years old (see p. 3-149 of the FEIS). More recent observations within the Tionesta Research Natural Area noted black cherry trees over 180 years old that outwardly appeared healthy and appeared to contain high value per U.S. Forest Service grade guidelines (Engelman et al. unpublished). We have added a research question to the monitoring plan (Table 16, LRMP p. 52) to investigate the longevity of the Allegheny hardwood type on the ANF.

We selected 120 years of age to compare the relative amount of older Allegheny hardwood forest that would be sustained in each of the Alternatives, as it was past the rotation ages recommend by Parker and Merritt (1995) and older than the age where Marquis (1990) suggested black cherry mortality starts to increase.

We do anticipate some forest type changes to occur over the longer term, as forested stands age on the ANF. These effects are displayed in Table 3-26 (Forest Type Outcomes in Decade 6 by LRMP Alternative) in the direct and indirect effects section of Forest Vegetation section 3.2.1, Chapter 3 of the FEIS (p. 3-134).

Public Interest #210: The Allegheny National Forest should perpetuate the Allegheny hardwoods forest type.

Sample Statement: The Allegheny Hardwoods Forest type is a unique and valuable forest type. All efforts should be given to ensuring its perpetuation. The other forest types present on the ANF should also be maintained in their current distribution. The forest types have distributed themselves across the landscape naturally. (#97)

TO BENEFIT FOREST HEALTH AND THE ECONOMY

Sample Statement: [We] support a forest management plan for the Allegheny National Forest that will ensure multiple use, thus guaranteeing the perpetuation of the unique Allegheny Forest Type. This will improve the overall forest health and productivity, as well as provide a long-term sustainable supply of timber and wood products that support local forest products companies and the region's forest products economy. It has been well documented that the Allegheny is a very unique forest eco-system which produces high quality black cherry timber that is revered all over the world. (#174)

Response: We recognize that the Allegheny hardwood type, dominated by black cherry, is a unique resource, and valuable to regional biodiversity. Considerable public interest exists regarding the mix of forest types that should be sustained on the ANF. Note that vegetation composition is component 1 under the forest vegetation management issue identified in Chapter 1 of the FEIS (p. 1-7 and 1-8). The LRMP includes a number of goals (LRMP pp. 14 and 15), objectives (LRMP pp. 19 and 21) and design criteria (standards and guidelines) (LRMP pp. 65, 67 and 69-71) related to sustaining tree species and biodiversity on the ANF, some of which are briefly summarized in the following discussion.

Forest management on the ANF will feature intermediate and regeneration treatments in a variety of forest types, including the Allegheny hardwood type. Tables 3-35 and 3-36 (FEIS pp. 3-160 and 3-161) display the estimated acreage to be regenerated by forest type as projected by SPECTRUM modeling for decades 1, 2 and 6 of Forest Plan implementation. Alternative Cm would regenerate a moderate amount of Allegheny hardwoods relative to Alternatives A and B and sustain slightly less of this forest type in the long term.

Forest types anticipated to result in each Alternative are displayed in Tables 3-25 and 3-26 (Forest Type Outcomes in Decades 1, 2 and 6 by LRMP Alternative) in the direct and indirect effects section of Forest Vegetation 3.2.1, Chapter 3 of the FEIS (pp. 3-134).

Appendix A to the LRMP includes the rationale and scientific basis for the vegetation management practices to be applied in a number of forest types on the ANF, including Allegheny hardwoods. These practices are designed to create appropriate conditions for establishment and growth of the tree species that comprise each forest type when an area is regenerated, in order to sustain the forest type in the long term.

See the ROD (pp. 15-28) for the rationale for the selection of Alternative Cm.

In addition, see response to PI #216.

Public Interest #211: The Allegheny National Forest should reduce the emphasis on black cherry and manage for forest diversity.

Sample Statement: Once again the forest plan favors managing the forest for the benefit of the once rare black cherry. At the turn of the century this species wasn't a major silvicultural asset in the forest, now, due to intensive efforts, it comprises approximately 30% of the forest's overstory. We understand the profit motive involved in this management but question the ecological viability of such a practice. The cost to the whole

forest ecosystem is greater than benefits that would be realized from management practices that restore a more naturally occurring diverse forest. (#437)

Response: Silvicultural and reforestation activities on the ANF are designed to sustain a diversity of tree species and forest types in order to sustain long term forest health and biodiversity and achieve multiple use objectives. Considerable public interest exists regarding the mix of forest types that should be sustained on the ANF. Note that vegetation composition is component 1 under the forest vegetation management issue identified in Chapter 1 of the FEIS (pp. 1-7 and 1-8). Contrary to what the respondent asserts, there is not an emphasis on just the Allegheny hardwood type and black cherry in the LRMP for the ANF. The LRMP includes a number of goals, objectives and design criteria (standards and guidelines) related to sustaining tree species and biodiversity on the ANF, some of which are summarized in the following discussion.

The first goal listed for vegetation in the LRMP (see p. 14 of LRMP) is to provide a diversity of vegetation patterns across the landscape, a range of forest age classes and vegetative stages, a variety of healthy functioning vegetation layers, moderate to well stocked forest cover, and the variety of vegetation species or forest types necessary to achieve multiple resource objectives and sustain ecosystem health. Forestwide goals for forest vegetation include implementing and monitoring silvicultural and reforestation practices in order to be responsive to emerging issues and regenerate stands to a diversity of tree seedlings.

LRMP objectives (see LRMP pp. 19) include several items specifically related to sustaining tree species diversity on the ANF. These include:

- Conducting pre-commercial thinning or release in young forest stands to maintain species diversity, favor desired species (which in most cases are species that are minor components in a treated area), and improving health, vigor, and growth on 500 to 2,500 acres annually;
- Using prescribed fire on 75 to 400 acres annually to enhance ecosystem resiliency, conserve fire-adapted plant and animal biodiversity, and maintain and restore mixed oak ecosystems;
- Maintaining aspen, oak, and conifer components on the ANF.

The monitoring plan or the LRMP includes monitoring items related to these objectives (see Table 14, p. 45 of the LRMP), as well as monitoring the tree species composition, diversity, and effectiveness of reforestation treatments to obtain species diversity (see Table 15, p. 50 of the LRMP).

The forest that existed on the ANF prior to the turn of the twentieth century consisted primarily of northern hardwoods dominated by sugar maple, American beech, and eastern hemlock. The future health of this forest type is of particular concern due to the effects of site nutrient limitations (sugar maple) and non-native insects and diseases (American beech and eastern hemlock) (FEIS pp. 3-93, 3-97 to 3-99, 3-100, 3-101, 3-103, 3-104, 3-126 to 3-131, 3-148, 3-164, 3-174, and 3-175). Turn of the century cutting brought about dramatic changes in the tree species composition of the ANF. Black cherry, only 0.8 percent of the pre-settlement tree species, represents 23 percent of the trees in today's forest (FEIS p. 3-81). Allegheny hardwoods are dominated by black cherry and constitute 28% of ANF forested land, while forest types dominated by species other than black cherry dominate 72% of the ANF. ANF reforestation practices are designed to promote a diversity of tree seedlings, for the most part depending on the tree seed source present. The Forest Plan contains a number of 2400 Vegetation Management and 3400 Forest Pest Management guidelines designed to promote tree species diversity (LRMP pp. 67, 71, 93, and 94), including certain reforestation practices:

- In harvest areas, retain a component of healthy trees of species which are minor components of a stand;
- Where feasible, retain low-growing, flowering, and fruiting trees and shrubs;

- In intermediate and shelterwood seed cuts, retain good quality seed trees of diverse species representative of the existing stand;
- In intermediate and shelterwood seed cuts, preserve seed sources of scarce species;
- Retaining appropriate amounts of hemlock and white pine;
- Favor sugar maple, ash, and basswood on nutrient-rich sites;
- Enhancing potentially resistant American beech and discouraging susceptible American beech.

Appendix A to the LRMP provides the rationale and scientific bases for the selection of vegetation management to be used on the ANF. Sustaining species diversity and forest types present on the ANF is a primary focus of these vegetation management practices, including reforestation techniques, included in this appendix. As noted on p. A-2:

“In order to ensure abundant and diverse seedling regeneration on the ANF, a number of intensive treatments are applied where needed, including:

- Ensuring retention of a diverse seed supply.
- Controlling deer browsing impacts through fencing, and concentrating removal harvests within a small geographical area.
- Providing adequate light to the forest floor through removal of overstory trees.
- Removing low shade and interfering vegetation.
- Controlling forest floor disturbance.
- Waiting for seedling establishment, as some species take 8 to 20 years to become established.
- Releasing less common or unique tree species in order to better maintain seedling abundance and species diversity in regenerating areas.”

See the ROD (pp. 15-28) for the rationale in choosing the management practices affecting forest diversity in Alternative Cm.

Conifer

Public Interest #212: The Allegheny National Forest should exclude mountain laurel and rhododendron from the 10 percent conifer component goal.

Sample Statement: I think a goal of 10% of the ANF in Conifers is good if you are talking trees, such as pines, hemlocks, spruce mixed with other things. I think the Mt. Laurel, Rhododendron should be in addition to the 10% conifer sites we do not end up with say, only 2% of the forest in pines, hemlocks, spruce, fir and 8% in Mt. Laurel, etc. (#278)

Response: The importance of conifer to achieve wildlife as well as ecological objectives was recognized early in the planning process, during development of the ecological context (p. 114). Additionally the LRMP objective related to conifer is to provide a minimum of 10 percent of the ANF (LRMP p. 19) in conifer only.

Public Interest #213: The Forest Plan should modify MA 1.0 direction to increase conifer cover to 1,000 acres.

Sample Statement: Conifer cover should be increased to 1,000 in this MA 1.0 as research shows that conifers provide cover when snow depths don't for grouse. (#216)

Response: Language has been added to the desired condition of MA 1.0 on the amount of conifer desired in MA 1.0 (LRMP p. 102).

3.9.3 Terrestrial Habitat

Early Structural Habitat

Public Interest #214: The Allegheny National Forest should divide the early successional habitat designation into two age classes.

Sample Statement: We felt that the over-all goal of 12% early successional habitat for the long-term is appropriate. However, early successional habitat should be broken down into 2 age classes - 1-10 and 11-20. A 5-10 year old forest is much different than a 15-20 year old stand...depending on the site and species. Rapidly growing species such as cherry will often move beyond good early successional habitat before 20 years. (#106)

Response: We agree that there are differences between 1-10 year old stand versus 10-20 year old stands and the short-term nature of early successional habitat was recognized and is discussed in the FEIS on pp. 3-215, 3-237 and 3-244. Also as described under the mourning warbler (FEIS p. 3-244), some early successional species will utilize early structural habitat for up to 20 years, although it would be expected that the density of these birds would be reduced as the stand matures to 20 years of age and beyond (FEIS p. 3-245). Also as discussed, this would vary by site and as suggested, forest type. So while there are always exceptions, we feel the 0-20 year age class accurately reflects habitat conditions preferred by most early successional species, including many early successional species that are currently declining.

Public Interest #215: The Forest Plan should emphasize early structural habitat to benefit wildlife.

Sample Statement: Early successional wildlife habitat is grossly under emphasized in this plan. The amount of MA 2.2 under alternative B is 13 times the amount of 1.0. The DEIS points out that 30 species utilize exclusively early successional habitat and another 150 species use it in combination with other habitats. We recognize that MA 3.0 will provide additional early successional habitat, but the creation of early successional habitat for wildlife purposes should be intentional, not incidental. It is irresponsible to designate only 1.4% of the forest for 150 species. (#106)

Sample Statement: Early successional habitat is the preferred habitat for a number of wildlife species including grouse, woodcock, and rabbits. As the amount of early successional habitat decreases, so does the prevalence of these wildlife species that are dependent upon this habitat for their continued existence. Additionally, there are endangered species that are dependent upon an adequate amount of early successional habitat to ensure survival. Given the decreasing amount of early successional habitat that is proposed under the preferred alternative C, this alternative increases the possibility of these endangered species becoming extinct. (#484)

Response: The need to provide additional emphasis for early successional species was recognized in the FEIS. Specific changes included in the FEIS and Revised LRMP to address this need included 1) the addition of a specific objective in MA 3.0 related to creating early structural habitat for game species and other wildlife (LRMP p. 113), 2) removal of the 10 acres size limitation on aspen treatments within MA 1.0 (LRMP p. 104), 3) a 27%

increase in MA 1.0 lands under Alternative Cm and 4) The mourning warbler was selected as the Management Indicator Species to represent all the species that utilize early structural habitat. Collectively these changes provide additional emphasis on the maintenance of habitat for early successional species, as well as allow for increased monitoring of this forest community. In addition, while it is suggested that the increase in lands devoted to late successional forest (MA 2.2) may lead to the extinction of early successional species, Alternative Cm will increase levels of early successional habitat over what have occurred on the Forest in the last 20 years (FEIS p. 3-245 and ecological context p. 114). In summary, although Alternatives A and B will result in greater levels of early successional habitat, it is anticipated that the suitable habitat created through management under Alternative Cm, combined with naturally occurring habitat, will be adequate to support local and forestwide populations of early successional species (FEIS p. 3-245).

Public Interest #216: The Forest Plan should designate an equal balance of early structural and late structural habitat.

Sample Statement: If the preferred alternative C is adopted, an inadequate amount of early successional forest will be present, which will ultimately lead to an inadequate amount of mature timber at a later date after what is now mature timber begins to die or is harvested. This lack of mature timber will have a substantial impact on the overall health and diversity of the Allegheny National Forest. Accordingly, rather than relying on disturbances (such as fires, oil and gas production, etc.) to create greater levels of early successional habitat, the preferred alternative must be rescinded and revised so that, as recommended, there is an equal balance between late successional habitat and early successional habitat. (#484)

Sample Statement: Recommendation: Preferred age distribution in MA's suitable for timber harvest (approximately 355,000 acres): 0-50 yrs, 25%; 51-110 yrs, 50%; >110 yrs 25%. Preferred distribution is suggested because of regeneration concerns in the forest, exacerbated by large shading canopies generated by the older age philosophy. (#201)

Sample Statement: There are no proposed expansions of early structural habitat or planned linkages of the areas designated MA 1.0. This is unacceptable, as it discriminates against early succession species and puts long-term forest sustainability at risk...The acreage of early succession forest should be increased in the Plan, with an ultimate goal of a balanced forest structure that includes: 25% early succession/50% mid succession/25% late succession. (#268)

Response: Forestwide objectives for the ANF include objectives for the mix of forest structural conditions to be sustained in the long term (see LRMP, p. 20). Table 1 in the LRMP displays these conditions, which include sustaining 8 percent early structural (dominant tree layer less than 5 inches DBH), 72% mid structural (dominant tree layer 5-20 inches DBH) and 10% late structural vegetation (dominant tree layer >20 inches DBH) by 2020. The majority of the ANF is presently mid-structural as a result of extensive timber harvesting that occurred 75 - 115 years ago (see pp. 3-78 to 3-81 of Chapter 3 in the FEIS). By the year 2060, the objectives for structural stage distribution are 10% early structural, 48% mid structural, and 28% late structural vegetation across the ANF landscape (see LRMP Table 1, p. 19).

Some of the respondents above use different definitions for structural classes (early structural: 0-50 yrs, 25%; mid structural: 51-110 yrs, 50%; and late structural: >110 yrs, 25%) than those used in the LRMP (based on the size of dominant tree layers). Table 3-28 on p. 3-139 of the FEIS lists the long-term age class outcomes anticipated in decade 6 of LRMP implementation. As seen in the table, Alternative Cm would result in 22% forest vegetation 0-50 years old, 50% 51-140 years old, and 25% older than 141 years (includes areas allocated to uneven-aged silviculture) by decade 6 of implementation.

The effects of forest vegetation management activities projected for Alternative Cm on early structural wildlife species are described on pp. 3-179 to 3-289 in Chapter 3 of the FEIS. See response to PI #209 for discussion of structural stage definitions used in the LRMP and FEIS. See response to PI #220 for further discussion of forest

structural characteristics. The ROD (pp. 15-28, particularly pp. 24, 25, 27, and 28) gives the rationale for the balance of forest structural habitat selected in Alternative Cm.

Public Interest #217: The Allegheny National Forest should manage birch and cherry for a longer rotation period in MA 1.0 and allow regeneration treatments up to 40 acres in MA 1.0.

Sample Statement: MA 1.0 - If birch and cherry are included in MA 1.0, then allow a longer rotation for these species. 2400- Regeneration treatments should be allowed to go up to 40 acres in size. Ten acres is nice, but you don't want to lose opportunities for regeneration solely because of a size limitation. (#216)

Response: Management Area 1.0 is designed to sustain wildlife species associated with early structural habitat, especially ruffed grouse. Even-aged timber stands with a balance of 0-50 year old age classes would be evident (LRMP p. 102). These shorter rotations are needed in order to enhance wildlife species dependent on younger forests. We have removed the ten acre size limit (LRMP p. 104) in order to provide more flexibility to deal with various aspen regeneration concerns during project implementation.

Public Interest #218: The Allegheny National Forest should manage herbaceous vegetation openings for cool and warm season grasses.

Sample Statement: All the plans are to keep approximately 2% of the forest in herbaceous type openings. I would go further to say that of this 2% at least one percent should be in managed cool season grasses mowed one, two or three times per year. Many of the cool season grasses are heavily used by a variety of native wildlife species, both hunted and non hunted species. So the present program of having the PGC and other cooperators of the ANF itself maintain mowed openings in cool season grasses is a benefit to our native wildlife and to those who enjoy seeing and or hunting our native wildlife. Along with one percent of the forest being maintained in cool season grasses I would suggest that one percent also be maintained in warm season grasses such as switch grass, big blue stem, eastern gamma grass, deer tongue grass and little blue stem and maybe some others. I would actually suggest 2 to 3% of the total forest be kept in herbaceous openings. 1% cool season 1% warm season, 1% whatever grows herbaceous on its own. (#278)

Response: Many of the small forested openings described on pp. 3-187 and 3-188 of the FEIS are currently maintained as cool season grasses and many of these have been and will continue to be maintained by the Pennsylvania Game Commission. As suggested, it is anticipated that future opening development will consist of a combination of cool and warm season grasses in order to meet the needs of wildlife. The final decision on the type of new opening to be developed will be made at the project level and will be based on site specific considerations. Only native and desired non-native species will be utilized (LRMP p. 53).

Late Structural Habitat

Public Interest #219: The Allegheny National Forest should emphasize late structural habitat.

Sample Statement: An important issue that is at the foundation of the structural goals within the PLRMP is the concept of late successional forests. It is not always clear how or if the management activities considered suitable for this category of management area will promote, to the fullest extent possible, the old, structurally complex, systems that are so important in the region. First of all, the category of oldest forest being >140 years does not necessarily limit timber harvesting nor ensure that these forests will go on to mature and move into a functional old growth state. With scheduled timber production, harvest for other resource use and salvage/sanitation permitted, these areas stand to lose significant amounts of the structure that builds slowly over decades and centuries. Core areas and corridors are the places that can serve as the building blocks of these truly diverse forests and the management within those units should account for and count on natural disturbances creating patches of varying age forests. (#95)

Sample Statement: The objective of restoration of late structural habitat should be greatly increased.

Comparing the four alternatives for percent of forest land by structural habitat diversity by 2060 (fig. ES-5), it is evident that there is not a significant difference between the alternatives. There should be an alternative considered that has as much habitat in late successional forest by 2060 as possible if no commercial logging is allowed in the Proposed Land and Resource Management Plan. In order to achieve true habitat diversity across the Eastern United States, public lands such as the ANF should be allowed to achieve complete late successional stage because there is relatively little habitat left, especially on private lands, of that growth stage. It makes ecological and logical sense to achieve total late successional forest on the approximately 500,000 acres of the ANF in order to create greater habitat diversity when taking into consideration the habitat structure and patterns across the larger, surrounding landscape. Certainly there is an over abundance of early and mid successional stage forest surrounding the ANF and in the East in general. The PLRMP should not be encouraging or creating more habitat for species, that thrive on early and mid successional forest, but rather restoring, in the long term, more habitat for species that need late successional forest. Those are the species most in decline and threatened because of loss of habitat. (#236)

TO PROTECT AQUATIC SPECIES

Sample Statement: Aquatic species are most imperiled, followed by late-successional forest species. Aquatic species health is directly related to matrix forest health, supporting further the position that mature forest conditions (structurally diverse stands) need to be much more widespread on the Allegheny National Forest. Forest management aimed at primarily early-successional timber production will simply not meet the needs of the species at risk. (#331)

Response: In Alternative Cm, the proportion of the ANF in late structural habitat will reach 139,596 acres by the 6th decade. This is substantially more late structural habitat than the 18,066 acres that currently exists. Active timber harvest will not occur in all late structural habitats. For example, no scheduled timber harvest will occur in MAs 5.1, 5.2, 7.2, 8.1, 8.2, 8.3, 8.4, 8.5, and 8.6. As a whole, approximately one quarter of the ANF will be passively managed to provide future late successional characteristics. In MA 2.2, the desired future condition emphasizes late structural forests and the structural characteristics that make up these old forests (FEIS p. 2-39). In addition, within MA 2.2, timber harvest will only be permitted to achieve one of the following site specific conditions: 1) to restore understory conditions that have been adversely affected by deer, are dominated by fern and lack woody understory vegetation (Appendix A of the LRMP p. A-27), 2) in an effort to help maintain oak, which is expected to decline in the absence of disturbance and fire, 3) to accelerate some late structural forest conditions, such as larger diameter trees and crowns, 4) to enhance mast species or conifer and 5) to enhance habitat for species with viability concerns (LRMP p. 111). In addition, final harvest treatments permitted within MA 2.2 are reduced in size and are not allowed to compromise connectivity of the corridor.

We recognize that “managing” for late successional values is controversial. However, there is a growing body of literature related to providing silvicultural techniques to accelerate or hasten the development of selected old growth characteristics or conditions (FEIS p. 3-143). Also, it is recognized that some old growth attributes are dependent on site, natural disturbance and time (FEIS p. 3-143) and the strategy within MA 2.2 is to use a combination of active and passive management. For example, while approximately 19% of MA 2.2 (FEIS p. 3-153) may receive some form of timber harvest to achieve one of the above objectives, approximately 50% of MA 2.2 will be passively managed with no active management (FEIS p. 3-152).

The amount of early, mid, and late structural habitat provided in each Alternative is displayed in Table 3-50 (FEIS p. 3-220). “Part of the rationale for MA 2.2 is to avoid an approach that provides small, scattered parcels of old forest and instead provides large patches of old growth that are more connected across the landscape.” (FEIS Plant and Animal Direct and Indirect Effects, Late Structural Habitat p. 3-219)

The ANF did examine the minimum benchmark that would in effect ‘maximize’ late structural forest. This benchmark estimated 219,420 acres, or 43 percent of the ANF, of late structural forest by the sixth decade (FEIS Appendix B, p B-43). This is not substantially larger than the 39 percent estimated for Alternative D (FEIS p. 3-220, Appendix B, p. B-49).

Significant differences in seral stages occur by Alternative. Early structural habitat varies from 3 to 14% while late structural habitat varies from 24 to 39%. The Forest Service is mandated to provide habitat to support viable populations of all native species, not just species that utilize late structural forests. Alternative Cm provides a balance of seral stages to support species with viability concerns that utilize late structural forests as well as early structural forests.

Under the cumulative effects analysis, it is estimated that 10 to 17% of the 4 county area surrounding the ANF will be early structural habitat and 25 to 40% will be late structural habitat by the 6th decade (FEIS p. 3-261). These percentages of early and late structural habitat in and around the ANF are sufficient to support species with viability concerns.

The ANF recognizes the connection between watershed protection and aquatic habitat. See PI #66 for a discussion on standards and guidelines in the LRMP that protect watersheds.

Habitat Connectivity and Landscape Corridors

Public Interest #220: The Forest Plan should provide for connectivity of early structural habitat.

Sample Statement: We appreciate the efforts of the Forest to provide early successional habitat emphasis areas that will provide crucial habitat for dozens of species...The maps showed that these areas have been essentially isolated from each other and from managed Forest Service lands, or they are surrounded by private lands. The Forest has not provided for any way to insure that wildlife produced in these areas is linked to other early successional habitat areas by reasonable dispersal routes. Early successional wildlife such as grouse and snowshoe hares disperse on the ground and, while corridors of early successional habitat are not necessarily needed for successful dispersal, large tracts of mature forest and private lands that may or may not be forested are likely very undesirable scenarios from a dispersal standpoint. These areas then potentially become ecological sinks for some species, where productivity is basically wasted. Songbirds and other more mobile and less vulnerable wildlife probably would have no problem dispersing from these areas...At the very least, the MA 1.0 should be adjacent to MA 3.0 such that some reasonable continuity of habitat types could be provided. (#106)

Sample Statement: One could make a much better argument...for “early successional linkages” given the relative lack of this habitat type and the fact that popular declining species like snowshoe hare and ruffed grouse must move through large areas of unsuitable habitat in order to disperse to good habitat, yet nothing is being done to facilitate their movement across the landscape. (#106)

Sample Statement: The largest tract of MA 1.0 in the southeastern part of the Forest is completely surrounded by MA 2.2 and 2.1 both habitats that will not facilitate dispersal of early successional wildlife. (#106)

Response: There were a number of factors considered in the FEIS that looked at the distribution of available early successional habitat. For example, three of the four Alternatives considered will increase the amount of early successional habitat over what presently exists on the ANF and in the long term, Alternatives A, B and Cm will increase available early successional habitat by 61%, 48% and 21% respectively (FEIS p. 3-245). Additionally, as described on p. 3-187 of the FEIS, many shrub nesting species, including declining species such as the golden-winged warbler, will utilize small habitat patches within a predominately forested landscape. As a result, it is not anticipated that the early successional habitat created will be of little use to early successional wildlife as suggested. Finally, as described on p. 3-246 of the FEIS, it is anticipated that the suitable habitat created through

management, combined with naturally occurring habitat, will be adequate to support local and forestwide populations of early successional species (FEIS p. 3-246).

See also response to PI #215, related to the increase in MA 1.0 lands between the draft and final versions of the LRMP and EIS.

Public Interest #221: The Allegheny National Forest should perform a habitat suitability evaluation for each proposed landscape corridor.

Sample Statement: The corridors shown in Alternative C and expanded somewhat in Alternative D follow jurisdiction boundaries of the national forest and existing management units. The ecological value of these corridors is compromised if they do not capture needed habitats and are not configured (i.e. wide enough or continuous) to accommodate natural disturbances or forest management, both on the ANF and on adjacent non-ANF lands. Additionally, some corridors are oriented to traverse elevational and habitat gradients that may or may not serve the needs of species utilizing these areas. Habitat suitability evaluation has been detailed for management areas broadly across the entire forest but not for individual corridors or corridors as a whole. A corridor-by-corridor evaluation is needed to determine if boundaries of management units should be changed or if special management approaches are needed based upon the management that occurs on adjacent non-ANF lands. (#95)

Response: An analysis of the corridor was completed between the DEIS and FEIS that looked at both increasing and reducing the corridor, although only those proposals that achieved late successional objectives and contributed to the Desired Future Condition for MA 2.2 were considered (LRMP p. 109). While private land uses certainly are a consideration, final corridor design achieves these desired objectives by 1) providing large contiguous tracts of high quality forest habitat and source habitats for area sensitive species, 2) providing connection to or inclusion of remote forest and large blocks of core habitat, 3) including known habitat for a variety of species with viability concerns (e.g. timber rattlesnake), as well as many unique and sensitive habitats, 4) providing a diversity of topographic and landscape conditions and 5) provide large, contiguous predominately late structural forest conditions that are widely scattered across the Forest and will both complement and support other lands that are managed more intensively and provide for the long-term retention of desired habitats and landscape conditions. Thus, while it is recognized that the corridor could be expanded, the design of the landscape corridors and the retention of core areas and remote habitat in the preferred Alternative (Cm) are expected to maintain or improve landscape level values unique to the ANF.

Public Interest #222: The Forest Plan should decrease the size of MA 2.2 since scientific research does not justify the proposed size and importance.

Sample Statement: We examined nearly 700 titles, abstracts, and/or complete texts for compelling evidence to justify landscape, old growth, or wildlife corridors in general on the ANF. We found no articles referencing landscape corridors (not surprising since the term was recently invented) and only one article specifically referencing old growth corridors in the US (Pacific Northwest)...The creation of 123,000 acres of MA 2.2 appears arbitrary and capricious considering that the plan does not propose to try to link any other habitat types ...There is no reason to suspect that any species of wildlife will benefit directly from MA 2.2. The DEIS (pages 3-161) states that there are no known old growth obligates...We can support half as much MA 2.2 in Alt B recognizing that a certain amount of old growth will need to be represented. (#106)

Sample Statement: I would like to express my concerns and opinions about the proposed Forest Plan Revision. One major issue that has been discussed and placed into Alternative C and Alternative D is the use and management of landscape corridors. I do not support the proposed use of landscape corridors. (#160)

Response: The benefits of spatially arranging late-structural forests on the landscape are described in the Plant and Animal Affected Environment under Habitat Indicator 3: Changes in Habitat Patterns on the landscape affecting patch size and habitats with less human disturbance (FEIS pp. 3-191 to 3-194). Late structural forests

connected across the landscape will provide habitat for more than 20 species with viability concerns on the ANF (e.g. Northern flying squirrels and Allegheny woodrats), species that are sensitive to human disturbance (e.g. nesting great blue herons and goshawks), and species that are impacted by roads (e.g. timber rattlesnakes and wood turtles). Large blocks of older forests are declining in the Mid-Atlantic Region, a habitat essential to an entire guild of forest interior dwelling birds. Brauning (1992) identified 42 bird species found on the ANF that prefer forest interior habitat and of these, 22 species are considered obligates of large forest blocks.

These large forest blocks of connected forest are “source habitats” for forest interior species, and increase species resiliency by maintaining genetic heterozygosity. The ANF was recognized in the Pennsylvania Comprehensive Wildlife Conservation Strategy for taking an innovative approach to providing late structural forest spatially arranged in a connected pattern on the landscape.

The landscape linkages analysis began by examining the 1986 Forest Plan lands designated as MA 6.1 which provided 126,900 acres of mature to overmature forest habitat for wildlife. Spatial adjustments were made to these MA 6.1 lands to provide landscape connectivity between the large forest blocks or core areas. Geographic Information Systems were used to incorporate areas without roads, raptor concentration areas, rattlesnake dens, bat caves, and other unique features; locations and habitats of species with viability concerns; locations of late structural habitats identified in prior project analyses; locations of exceptional value watersheds and Class A trout streams (FEIS p. 3-188). The result was the creation of 121,000 acres of connected late structural habitat (MA 2.2) under Alternative Cm and a reduction in MA 6.1 to 16,400 acres (Table 2-1, p. 2-46 of FEIS)

The concepts of providing large patches of late structural forests are found in the Landscape Ecology, Conservation Biology, and Wildlife literature. A few examples relevant to the landscape of the ANF included in the habitat patterns section of the FEIS are Brauning (1992), Morrison et al. (1992), Lindenmayer and Franklin (2002), Keller et al. (2003), Urban (2005), Hilty et al. (2006), and PA Game Commission and PA Fish and Boat Commission (2005) (FEIS pp. 3-191 and 3-192). The Wildlife Society 1997 National Conference working group session on landscape corridors contains additional material (Fischer and O’Neil 1997).

We acknowledge that there is conflicting science and no consensus among scientists as to how much early versus late successional habitat to provide across the landscape. We received comments from the Nature Conservancy, Western Pennsylvania Conservancy, U.S. Department of Interior, and other agencies with environmental expertise favoring Alternative D which contains the largest acreage in MA 2.2. There is still much to be learned about the values of connected late structural habitats but the concepts show much promise for sustaining viable populations of species that utilize late-structural forests, species that are sensitive to human disturbance, and species that are impacted by roads (FEIS pp. 3-191 and 3-192).

See also response to PI #220 on connectivity of early structural habitat.

Public Interest #223: The Final EIS should describe the wildlife species that will require the proposed late structural linkages.

Sample Statement: I support the concept of using corridors to connect otherwise disconnected patches of habitat, but I believe that the design of the proposed corridors needs to be more specifically defined. I would assume that the corridors will need to be designed in such a way as to accommodate the needs of the species of concern with the greatest (widest) corridor size. In other words, to facilitate the safe movement of species X along a corridor, the corridor must be at least xx feet wide. If that is the case, I would ask the following questions: 1. What species are projected to require these corridors? 2. What width of corridor does each require? 3. What impact does topography have on required corridor width? 4. How close to the corridor can roads and motorized trails be before negatively impacting the usefulness of the corridor? (#235)

Response: See response to PIs #222 and 221. Monitoring the landscape linkages to determine specific wildlife benefits such as minimum widths and impacts of roads vary by species and are addressed under Research Needs (LRMP p. 52).

Late structural forests connected across the landscape will provide habitat for more than 20 species with viability concerns on the ANF (e.g. Northern flying squirrels and Allegheny woodrats), species that are sensitive to human disturbance (e.g. nesting great blue herons and goshawks) and species that are impacted by roads (e.g. timber rattlesnakes and wood turtles). Large blocks of older forests are declining in the Mid-Atlantic Region, a habitat essential to an entire guild of forest interior dwelling birds. Brauning (1992) identified 42 bird species found on the ANF that prefer forest interior habitat and of these, 22 species are considered obligates of large forest blocks.

These large forest blocks of connected forest are “source habitats” for forest interior species, and increase species resiliency by maintaining genetic heterozygosity. The ANF was recognized in the Pennsylvania Comprehensive Wildlife Conservation Strategy for taking an innovative approach to providing late structural forest spatially arranged in a connected pattern on the landscape.

The spatial configuration of late structural habitats was designed for: 1) providing large contiguous tracts of high quality forest habitat and source habitats for area sensitive species, 2) providing connection to or inclusion of remote forest and large blocks of core habitat, 3) including known habitat for a variety of species with viability concerns (e.g. timber rattlesnake), as well as many unique and sensitive habitats, 4) providing a diversity of topographic and landscape conditions and 5) provide large contiguous predominately late structural forest conditions that are widely scattered across the Forest and will both complement and support other lands that are managed more intensively and provide for the long-term retention of desired habitats and landscape conditions. Thus, while it is recognized that corridors could be expanded, the design of the landscape corridors and the retention of core areas and remote habitat (FEIS pp. 3-228 to 3-230) in the preferred Alternative (Cm), will achieve forestwide landscape objectives (LRMP pp. 45-47).

Public Interest #224: The Allegheny National Forest should limit landscape corridors to riparian areas.

Sample Statement: We recognize the desire to provide for connectivity, but feel the current distribution in Alternative C is excessive. We do not support the proposed 123,445 acres that will be managed as a landscape corridor. [We] suggest limiting the corridor to riparian areas that have natural connecting habitat. (#97)

Sample Statement: The need for wildlife corridors is unproven and their effectiveness highly questionable, especially to the extreme degree this proposed plan calls for. Devoting one-fourth of the ANF to these corridors is not a wise use of these acres. Wildlife corridors should be limited to existing riparian areas that are already being managed in part for this purpose. (#132)

Response: As described in response to PI #221, the landscape corridor is designed to achieve a variety of objectives. While the different Alternatives propose different amounts of corridor and provide alternative configurations, they all contribute to the Desired Condition for MA 2.2 (LRMP p. 109) and achieve late successional values (LRMP pp. 185-187) to some extent. If the corridor is to achieve desired objectives (FEIS pp. 3-185 to 3-187), particularly providing desired wildlife habitat, it needs to contain topographic and landscape conditions that are representative of the Forest and restricting it to riparian areas only would not achieve this.

Public Interest #225: The Forest Plan should reduce the acreage in MA 2.2 to reduce conflicts with incompatible activities.

Sample Statement: We believe the Forest Service is taking too great of a risk by placing 25 percent of ANF acreage into a questionable uneven-aged management system...Additionally, [we] have concerns about utilizing MA 2.2 (Late Structural Linkages) to create this significant expansion of uneven-aged management...[We] are concerned that these corridors on will have a negative impact on tree regeneration and future forest composition. The Plan anticipates a slight decline of Allegheny hardwoods. This may be an

underestimation, given the significant increase in uneven-aged management proposed on the ANF. We also know these corridors will have an impact on the expense and efficiency of the ANF's vegetative management program. Most importantly, [we] question the ability for many of these corridors to achieve the desired continuous canopy outcome, given the level of oil and gas development occurring in many portions of the ANF. The Plan indicates that about one third of the corridors will be impacted by oil and gas activity. Recommendation: The area dedicated to MA 2.2 should be greatly reduced. [We] recommend the following: Adopt Alternative B as it relates to MA 2.2. This would eliminate certain corridors that have a high probability for conflict with current or future oil and gas development, including: (a) the area southeast of the Tionesta Natural Area; (b) the areas north and east of the tract of MA 1.0 land in the southeast corner of the ANF. (c) Make amendments to the MA 2.2 in Alternative B, to further eliminate or revise additional corridors where the impact of current and future oil and gas development will conflict with continuous canopy goals of the MA 2.2. We recommend the Forest Service focus on the following areas of proposed MA 2.2 in Alternative B: the area along the eastern border of the ANF, between Ridgway and the Kane Experimental Forest; (d) the corridor south of Minister Valley in the western portion of the ANF; (e) the area southwest and east of Sheffield; (f) portions of the area north of PA Route 59, in the Morrison Run area of the Allegheny Reservoir. We also recommend that the Forest Service conduct further review of those MA 2.2 corridors in Alternative B that intersect with non-federal land to ensure that the management strategies on these non-federal lands do not conflict with the continuous canopy goals of MA 2.2. MA 2.2 corridors should be eliminated or revised where obvious conflict exist. (#268)

Response: The DEIS incorrectly identified the entirety of MA 2.2 as uneven-aged management. The FEIS more clearly indicates that the area will have three types of vegetation management including uneven-aged management, even-aged management and no active management. The latter portion is associated with areas without road access. Ultimately, the determination of what vegetation activity is needed will be made on a site-specific basis subject to the standards and guidelines of the LRMP. Some transition of forest types from Allegheny Hardwoods to upland hardwood types is anticipated in MA 2.2.

Oil and gas developments as well as plugging and restoration of well sites in the long run are anticipated in MA 2.2. While these developments may lessen the ability of the MA to retain areas of limited human disturbance, vegetation management can still emphasize retention and development of older forest structure.

The ANF examined these suggestions for reducing the size of MA 2.2 as follows:

- (a) This section of MA 2.2 provided important southerly and easterly linkages from the old growth in Tionesta to the southeastern portion of the ANF.
- (b) Reductions were made to this area to expand MA 1.0 and MA 3.0, but some additional area was added to MA 2.2 for the conservation of rattlesnake habitat.
- (c) MA 2.2 was designed to avoid areas of concentrated oil and gas development, but this could not be achieved and provide for connectivity across the ANF.
- (d) This is the only portion of MA2.2 providing a connection to the southwestern corner of the ANF and was retained.
- (e) The MA 2.2 land allocations around Sheffield were reexamined, but the value of MA 2.2 along Tionesta creek and its tributaries was considered an important component of MA 2.2.
- (f) This area was important in providing areas of less disturbance as well as key habitat for several species of concern. It is also an important link in a north-south axis.

Within the ANF proclamation boundary, MA 2.2 provides both habitat and connectivity of continuous forest habitat, offsetting in part inclusions of private ownerships that would not retain this forest habitat. Endpoints for external connections of MA 2.2 included Allegheny State Park, Cook Forest, the Clarion River corridor and the Allegheny River corridor. While some MA 2.2 connections may not directly connect to other private landowners

committed to maintaining continuous canopy, these areas provide important habitat within the ANF and increase the resiliency of the overall strategy.

See response to PI #222 for a discussion on the scientific basis for MA 2.2.

Public Interest #226: The Allegheny National Forest should collaborate with adjacent landowners to establish functional landscape corridors.

Sample Statement: Alternative D does expand several corridors but still does not address discontinuities and the role of adjacent land and management. We recommend that an analysis of the corridor design requirements and potential involvement of key adjoining parcels be included in the revised management plan and that an explicit commitment is made to work beyond the boundaries of the ANF, in cooperation with other management entities, to make these corridors truly functional. (#95)

Response: Nothing in the LRMP precludes discussions with adjacent landowners concerning extension and compatibility of landscape corridors. We have had discussions with most of the large private and public landowners within the proclamation boundary. We have attempted to extend the landscape linkages to the edge of the ANF boundary to provide the opportunity for additional linkages beyond our boundaries. In addition, see response to PI #225.

Public Interest #227: The Allegheny National Forest should allow up to 40 acres of even-aged regeneration for aspen in MA 2.2.

Sample Statement: MA 2.2 - 2400 - do not lose the aspen forest type, should be added. In aspen types, even-age regeneration should be allowed up to 40 acres, not just 20 acres. (#216)

Response: For MA 2.2, 2400 Vegetation Management guidelines (LRMP p. 111) provide for even-aged regeneration in the aspen type in areas up to 20 acres in size in order to maintain shorter lived shade-intolerant forest types, such as aspen. The 20 acre size limit is designed to help ensure MA 2.2 provides late structural habitat and that such treatments do not bisect the corridor so as to interfere with late structural habitat linkages. Aspen stands in the corridor that exceed 20 acres would be subdivided into smaller stands less than 20 acres in size, with harvest of each subdivided piece scheduled in alternate decades so as not to exceed the 20 acres limit and yet still sustain the aspen forest type.

However, the limitation on the size of aspen clearcuts within MA 1.0 was removed from the LRMP (LRMP p. 104).

Public Interest #228: The Forest Plan should limit activities that fragment habitat within MA 2.2.

Sample Statement: Pages IV-8 to IV-11: Management Area 2.2 - Late structural linkages (corridors) Construction of new roads and pipelines, pit development, and gathering of firewood are among the activities that result in habitat discontinuity and loss of structure are considered suitable in this MA. These are all fragmenting features, some at significant scales. Such features are not consistent with one of the primary goals of these areas - linkage of habitat. Snowmobiling and ATV/OHM (in IUAs) is permitted on designated or multi-use trails not signed as closed. These activities can effectively elevate minor road or trails to more significant fragmenting features. Developed camping is also permitted in these area. Recommendations: Management and activities within areas designated for late structural linkages should be consistent with the overall design goals of the area. Increasing fragmentation within these already fragmented corridors decreases the value of these areas for linkage, adding impediments to wildlife movement. Activities that may physically or functionally fragment habitat should be limited or considered not suitable. Recreational activities such as developed camping should be kept to the periphery of the MA as should roads and infrastructure that may support it. (#95)

Sample Statement: I am disappointed that the standards and guidelines for Management Area 2.2, Late Structural Linkages, are so weak. I am OK with the standard that “new road construction shall occur only on existing road corridors and when needed to provide access to non federal land.” But beyond that there is not much to maintain the late successional characteristics in this management area except the silvicultural treatments. Since alternative C contains 123,445 acres in MA 2.2, it is very important that you provide some clear and effective management direction. How about limiting new pipelines and utility lines to existing corridors? And prohibiting new pit development or expansion? Perhaps 200 foot riparian corridors on all perennial streams in MA 2.2? That would be a good start. (#262)

Response: The desired condition of MA 2.2 is to provide late structural forests. Characteristics of late structural forests such as large woody debris, snags, multi-layered canopy with gaps, large diameter trees, a diverse understory and a conifer component will be emphasized (LRMP p.109). Mid to late structural habitat is provided on over 85 percent of the Management Area under Alternative Cm and as described the response to PI #219, over 50% of this Management Area will be passively managed. Also, timber harvest treatments have been modified to achieve desired objectives (see PI #219) and fragmentation resulting from roads and pits was recognized (FEIS p. 3-237). There will be no new pits and few new Forest Service roads within MA 2.2 cleared under any Alternative (see LRMP p. 112). Forestwide guidelines for riparian, wetland, and vernal pond buffers apply to this management area as well (LRMP p.83). Trail heads and parking areas should be located on the periphery of the management area (LRMP p. 119). The Longhouse IUA, which overlapped MA 2.2 in Alternative C, was eliminated in Alternative Cm.

Within MA 2.2 early structural habitat in non-oak forests will occur on only 2 to 4 percent of the Management Area. In oak forests, 4 to 6 percent will be early structural (LRMP p. 109). Silvicultural treatments are designed to sustain or accelerate development of late structural forest characteristics, restore understory forest conditions, enhance habitat of species with viability concerns, enhance mast production and retain mature overstories (LRMP p. 111).

Public Interest #229: The Allegheny National Forest should maintain a buffer around State Game Lands (SGL) and Late Structural Linkages to minimize illegal ATV/OHV use and habitat degradation.

Sample Statement: Alternatives A, B, and C propose two Intensive Use Areas that will surround the northern half of State Game Lands #28. If implemented, SGL 28 may inadvertently serve as an access corridor between the areas. Currently, illegal ATV and snowmobile use represent the greatest source of State Game Land citations written by Pennsylvania Game Commission Wildlife Conservation Officers. It is reasonable to believe such illegal activity will increase on SGL 28 if the parcel is surrounded by ANF Intensive Use Areas. ATVs and snowmobiles are not permitted on most SGL due to habitat degradation, direct mortality and increased stress to wildlife. Under that premise, intensive use is contradictory to stated objectives in Management Area 2.2 (late Structural Linkages where “wildlife management emphasizes species with viability concerns, remote and interior species with high sensitivity to disturbance, and protection of unique micro and macro habitats.”). In alternatives B, C and D, proposed Intensive Use Areas near SFL 28 overlap with and effectively cutoff an important Late Structural Linkage Management Area (ANF Planning Maps Alternatives B, C, D). We propose a minimum buffer of 2 miles around State Game Lands and recommend excluding intensive use from Late Structural Linkages. (#87)

Response: In Alternative Cm, the Longhouse IUA which overlaps MA 2.2 is dropped. Some of the other IUA parcels that overlap MA 2.2 already have existing motorized trails constructed to a high standard to reduce potential resource damage. The ANF will continue to monitor ATV use and may close trails if unacceptable resource damage is occurring either legally or illegally. The ANF is committed to working with PGC to resolve any OHV concerns that are creating unacceptable resource damage.

Public Interest #230: The Allegheny National Forest should protect the Morrison Run area.

Sample Statement: The Wilderness Society is opposed to the Alternative B allocation of MA 6.1 and MA 6.2 status for this area. The Morrison Run area is clearly an area that should never be harvested again. (#443)

Response: The LRMP identifies the Morrison Run area as Late Structural Linkages (MA 2.2). Vegetation management emphasizes providing complex late structural forest conditions and maintaining oak, aspen and white pine. See the ROD (p. 20) for the rationale for the change from Alternative C to Alternative Cm regarding Morrison.

Public Interest #231: The Final EIS should revise the management area designation for Coalbed Run and Painter Run from MA 3.0 to a designation that emphasizes dispersed recreation opportunities and late structural linkages.

Sample Statement: I have identified two areas that could better meet the demands on the forest resources if their Management Areas were reassigned. Coalbed Run...should be considered for MA revision from MA 3.0 to an MA that enhances dispersed recreation. As shown on the map, this area is primarily composed of trees 91-110 age class, with significant inclusion of trees 111-150 years old. The National Scenic North Country Trail traverses through the heart of this mature block for forest, and continues through the contiguous Minister Creek RRA... Painter Run is positioned to be a key link in the landscape Corridor both geographically and in forest composition. Located between the MA 2.2 of Steck Run and MA 2.2 and MA 8.1 of the Clarion River Corridor, Painter Run is the missing link in completing this late structural corridor. Painter Run is known occupied rattlesnake habitat...Please consider revising the management Area assignment from MA 3.0 to MA 2.2 for the Painter Run Watershed...While producing a significant benefit for dispersed recreation users, these MA changes, Painter Run on the Clarion River and Coalbed Run, would have little effect on the total amount of MA 3.0 in the ANF, and would not reduce the ASQ. (#138)

Response: Both of these suggestions were examined. Coalbed Run was not needed for landscape connection and did not merit a separate MA for dispersed recreation. Standards and guidelines were added for the North Country National Scenic Trail. Modifications were made to include 400 acres of Painter Run in MA 2.2.

Public Interest #232: The Allegheny National Forest should use uneven-aged management in late structural corridors.

Sample Statement: Timber management (presently even-aged and uneven-aged forest management) when applied across management blocks, is not always suited for the forest types being managed or to the goals of older, more structurally complex forests. This is particularly important within the late structural habitat areas that define the corridors within the plan. Uneven-aged management should be increased, particularly where shade tolerant species are dominant. Also, in the interest of creating corridors of more mature forest with continuous canopies, uneven-aged management can be utilized to a greater extent for the less shade tolerant species of the mid-successional forest types. Orienting corridors, to the greatest extent possible, to capture the late-successional forest types to which uneven-aged management can be applied, coupled with aggressive control measures against deer and interfering vegetation, will give these forest types a far greater chance to retain or increase presence within the ANF. Riparian corridors will particularly favor shade tolerant and unique forest types. (#95)

Response: Both even and uneven-aged management are permitted in MA 2.2 depending on the forest type (LRMP p. 111). Late structural habitat is still the focus, but some even-age management is needed to regenerate and sustain oak, aspen, and white pine as well as sustain an early structural component consistent with that assumed to occur under the natural disturbance regime for the ANF.

Public Interest #233: The Allegheny National Forest should retain flexible management options in MA 2.2.

Sample Statement: I like the areas in Alt C left in late structural linkages although even those areas may at times need some management in them to bring about plant species diversity. Although, I do not think breaks in these linkages will be a problem for any species of wildlife. Native wildlife rolls with the habitat changes and as long as we maintain a diverse habitat I believe the wildlife will not be greatly impeded by having to cross one type of forest habitat to get to another. (#278)

Response: The need to allow management within MA 2.2 was recognized and as suggested, vegetation management treatments are utilized to help sustain late structural vegetation characteristics in the long term, maintain a variety of forest types, provide a low level of early structural habitat and reduce risks from native and exotic insect and disease outbreaks (LRMP Table 21, p. 66 and LRMP p. 111). Salvage and reforestation activities are permitted to sustain forest health, respond to natural catastrophes, restore forest cover, or to achieve structural objectives for MA 2.2.

Public Interest #234: The Final EIS should change the designation of MA 2.2 to MA 6.1.

Sample Statement: Change the designation of MA 2.2 to MA 6.1, still providing the connectivity for wildlife movement. This reduces the long term age goal in line with our other comments. (#201)

Response: The ANF considered this suggestion, but ultimately elected to retain the MA 2.2 designation. The major reasons were to emphasize the connectivity aspect of MA 2.2 and the limitations on new road construction.

Habitat Fragmentation

Public Interest #235: The Allegheny National Forest should adopt a landscape scale ecosystem management approach that emphasizes core forest areas and late structural habitat.

Sample Statement: Specifically, in our letter we emphasized the adoption of a landscape scale ecosystem management approach in which: (1) large forest core areas are designated and maintained in a substantially natural state to maintain high-quality habitat for wide-ranging and interior forest species, (2) the surrounding matrix of working forests is managed to mimic natural disturbance regimes in terms of pattern, frequency, and scale, (3) substantial late-successional structural connectivity is created and maintained between forest cores for species movement, and (4) the ANF views itself as the best provider of high-quality biodiversity values in the context of regional forest management that currently is largely focused on even-aged, mid-rotational forest management for the production of conventional forest products. (#330)

Response: Ecosystem management principles were central to development of the LRMP and Alternative Cm. The elements identified by the respondent are part of the design of the LRMP. The LRMP includes large core areas (55,000 acres in MAs 5.1, 5.2, 7.2, 8.2, 8.3 and 8.5), a surrounding matrix area (287,000 acres in MA 3.0) and substantial late-structural forest connectivity (121,000 acres in MA 2.2) that also provide for some core habitat. The LRMP contains an approach in which the ANF is providing for high quality habitat while also maintaining a focus on mid-rotational forest management for production of conventional forest products.

Apart from what land areas should be included in each of the first three elements, the one difference is that the matrix areas of the ANF (MA 3.0) are not specifically managed to mimic levels of natural disturbance events. Alternative D was developed specifically to mimic these disturbance levels. The ANF has concluded that it is not desirable to attempt to mimic natural disturbance regimes in the matrix for the following reasons:

- The LRMP emphasizes sustaining landscape level vegetation patterns, restoring structural diversity, providing well distributed habitats, a range of forest age classes, and a variety of healthy functioning vegetation layers.

- Vegetation disturbance patterns (natural and those from management activities) will range in scale and frequency across the ANF landscape.
- Beech, hemlock and sugar maple (the species that comprised the original forest) all face substantial forest health threats and restoring their dominance is doubtful.
- Amounts of early structural habitat would range from 1 to 3 percent in Alternative D. Greater levels of early structural habitat are needed to provide for biological diversity.
- Other tree species important to regional and ANF biodiversity including oaks and black cherry would face declines. Natural disturbance regimes would lead to long harvest rotations for even-aged management, 300 years or possibly longer that exceed the likely lifespan of black cherry and other shade intolerant trees. This would seriously curtail the ability of the ANF to supply conventional forest products.

Instead, the LRMP takes a different approach to MA 3.0 that provides for even-aged forest management while still leaving a substantial amount of legacy elements that provide for retaining biological diversity. These are specifically included in the standards and guidelines of the LRMP. Among these are:

- Retention of species that are minor components of a stand (LRMP p. 65)
- Special practices for conservation of riparian areas and wetlands including springs, seeps, vernal pools and other wetlands (LRMP pp. 74-79). The result of these will be substantial retention of mature trees in these areas.
- Retention of slash and logs in final harvest units (LRMP p. 80)
- A minimum of one quarter acre of each 5 acre harvest unit set aside as a reserve area (LRMP p. 80)
- Retention of den trees (LRMP p. 80)
- Retention of mapped potential old growth areas (LRMP p. 80)
- Retention of snags (LRMP p. 81)

In addition, see response to PIs #236 and 238.

Public Interest #236: The Forest Plan should provide for larger core forest areas.

Sample Statement: The plan and the approach that the Forest Service takes to managing this substantial resource will need to consider the role of the ANF in preserving intact forest ecosystems that are important for Pennsylvania and the ecoregion. Maintaining large, contiguous areas of forest and managing only to correct problems that will not resolve without intervention (e.g. lack of regeneration due to deer over abundance), is key to creating the older, structurally complex forests that are few and small in size on the high plateau and unlikely to develop under even longer term timber rotations. The core habitat and corridors detailed in the draft plan do reflect the landscape - level priorities that our analysis has identified for the region. However, their size and configuration do not adequately capture the ecological possibilities recognized for these areas. We encourage the Forest Service to consider the possibility of expanding the core areas in both Alternative C and D to capture both additional core area and larger forested landscapes. (#95)

Sample Statement: Clearly, from the analyses that the Forest Service produced for the revised management plan/DEIS and WPC's analysis of forest resources in the high plateau and ANF, the area that includes the Hickory Creek Wilderness Area, Hickory Creek Extension, Allegheny Front and Minister Valley is one of

high value for biodiversity and forest ecosystems, as a whole. The relatively low amount of fragmenting features is an essential character of that landscape. Additionally, it holds some of the best opportunities to limit oil and gas development as described above. Any mechanism that can be utilized to maintain contiguous, unbroken forest with large core forest areas should be explored. (#95)

Response: The role the ANF plays in providing intact forest ecosystems and old growth in Pennsylvania was recognized early in the planning process and is discussed on pp. 129-162 of the ecological context, which is available on the ANF website. In addition, the acreage that is being managed to provide core forest will increase under the preferred Alternative, due to the addition of approximately 20,000 acres of wilderness study areas and remote recreation areas. The acreage managed to provide connectivity and late structural forest conditions will also increase due to the addition of 121,000 acres within MA 2.2 (FEIS p. 3-229). While it is recognized that corridor or core areas could be expanded further, implementation of Alternative Cm is expected to maintain or improve many of the landscape level values that are unique to the ANF.

Public Interest #237: The Allegheny National Forest should buffer wilderness and natural areas from timber sales.

Sample Statement: In all wilderness study areas and designated natural areas that have timber sales adjoining them, a “side light” buffer area should extend around the boundaries of these areas to prevent too much light from penetrating in and changing the ground flora. This buffer can be uneven age management. (#214)

Response: We share your concern about the potential effects management of adjacent lands may have on wilderness and natural areas. This type of concern will be addressed at the project level when specific treatments are proposed near these areas. Ground vegetation conditions are highly variable within wilderness and natural areas, so we believe it is most appropriate to address this type of concern based on specific situations. Boundaries of these areas are often formed by roads or other major breaks in vegetation.

Public Interest #238: The Forest Plan should emphasize intermediate and late structural forest habitat to decrease the effects of fragmentation on wildlife.

Sample Statement: If the timbering plan of Alternative C were fully implemented, areas of mature and recovering forests would be permanently opened. This expanse of developed land would prevent wildlife from moving to adjacent habitats; reduce the value of adjacent habitat for species having specialized habitat requirements; facilitate the movement of invasive exotic and parasitic species into the area; shift species diversity and composition to a smaller number of habitat generalists; increase competition for food, cover, and breeding sites in adjacent habitats that are already at optimum carrying capacity; and increase predation. These effects would be particularly acute for migratory birds. Forest fragmentation has been shown to cause significant declines in forest interior, neotropical migratory bird populations. The proposed timber harvest rotation would increase edge habitat and reduce forest block size, thereby enhancing access for common nest predators and habitat generalists such as crows, grackles, blue jays, house sparrows, raccoons, striped skunks, and opossums, which prey upon eggs and young of forest interior breeding birds, and displace the more diverse assemblage of habitat specialists that previously existed in the larger forest tracts. In addition, timber harvesting activities would impede the daily and seasonal movement of animals between various habitat types, and promote the decline of species that are less tolerant of disturbance. An operation of this size would present a formidable barrier for less mobile wildlife, especially smaller and slower-moving animals such as reptiles, amphibians, and small mammals. Alternative D, however, proposes to designate more wilderness/wilderness study areas and remote recreation areas, as well as manage for intermediate and late structural forest habitat which would decrease forest fragmentation and its associated adverse impacts to wildlife. Moreover, there are likely secondary or indirect adverse environmental effects beyond those associated with habitat loss or degradation, including increased runoff; stream erosion and sedimentation; and non-point source pollution. Overall, the proposed timber harvesting scheme of Alternative C would contribute to the continuing loss of forest interior habitat in this region of Pennsylvania. One of the most important

aspects of Alternative D for wildlife habitat and aquatic resources protection is a larger Management Area 2.2 linking larger “core areas” of contiguous forest. The corridor is proposed mainly along riparian areas, which would protect aquatic resources. The corridor should be adequately sized to provide enough interior forest habitat (discounting the area affected by edge) to be useful to forest interior species, such as many neotropical migratory birds. Also, by connecting large tracts of contiguous forest, interior dwelling species will be able to move through the Allegheny National Forest, increasing gene flow and biodiversity. (#159)

Sample Statement: [We] urge ANF to examine very closely and justify any further increase in new roads and harvest plans that increase fragmentation and the negative effect the latter can have on mammals. [We] suggest extreme caution and patience when considering any new road and suggests ANF examine the closing of roads, if possible. (#213)

Response: Areas of mature or recovering timber would not be opened up under Alternative Cm. Quite the contrary, no new road corridors built by the Forest Service or pits would be permitted in MA 2.2. No scheduled timber harvest would occur in MAs 5.1, 5.2, 7.2, 8.1, 8.2, 8.3, 8.3, 8.4 and 8.5.

Alternative Cm provides old growth/wildlife connectivity through the designation of 121,000 acres of landscape linkages (MA 2.2) and 55,000 acres of core habitat (FEIS Table 3-55, p. 3-229). This is more acreage than the Forest Service previously identified in the 1995 report entitled “A Landscape Approach to Providing Late-successional Forests and Associated Functions and Values on the ANF.”

The spatial configuration of late structural habitats in Alternative Cm will: 1) provide large contiguous tracts of high quality forest habitat and source habitats for area sensitive species, 2) providing connection to or inclusion of remote forest and large blocks of core habitat, 3) including known habitat for a variety of species with viability concerns (e.g. timber rattlesnake), as well as many unique and sensitive habitats, 4) providing a diversity of topographic and landscape conditions and 5) provide large contiguous predominately late structural forest conditions that are widely scattered across the Forest and will both complement and support other lands that are managed more intensively and provide for the long-term retention of desired habitats and landscape conditions. Thus, while it is recognized that corridors could be expanded, the design of the landscape corridors and the retention of core areas and remote habitat (FEIS pp. 3-228 to 3-230) in the preferred Alternative (Cm) will achieve forestwide landscape objectives for wildlife. Fragmentation effects at the landscape scale are reduced by this spatial configuration of late structural habitats. Edge effects, impacts to less mobile species and impacts to species that utilize remote habitats are addressed and mitigated in the analysis. Eighty eight percent of the highest quality remote wildlife habitat on the ANF would not allow new road or motorized trail construction under Alternative Cm (FEIS p. 3-228).

We do not agree that impacts to migratory birds would be severe and fragmentation would cause impacts to interior species. Potential impacts to migratory birds, and guidelines for conservation of migratory birds are addressed in the analysis (FEIS p. 3-208 and 3-257). Connectivity (the opposite of fragmentation) is addressed in the section entitled Habitat Indicator 3: Habitat Patterns on the Landscape (FEIS p. 3-228 to 3-230). New road construction is prohibited in MA 2.2 except under certain circumstances (LRMP – MA 2.2 – Transportation).

Additional information is provided in PI #228. See also response to PI #265 related to protecting habitat for species with viability concerns, response to PI #236 related to expansion of core habitat, response to PI #214 related to the short-term nature of early successional habitat created by timber harvest and response to PI #268 related to fragmentation and anticipated effects to interior bird species.

The rationale for selection of Alternative Cm is provided in the Record of Decision (pp. 27 and 28).

Public Interest #239: The Forest Plan should conserve elements of biodiversity critical to long term sustainability such as mycorrhizal-forming fungi.

Sample Statement: Ecological research supports the idea of functioning landscapes that are made up of large blocks of forest where little or no management is happening, surrounded by areas of uneven-aged management for commodity output that also maintains mature forest cover. Linden Mayer (2002) writes that “management practices in the matrix, will determine whether these goods and services (conservation of biodiversity, wood production, high quality waters) can be sustained, because such practices also influence whether elements of biodiversity critical to long-term sustainability, such as mycorrhizal-forming fungi, are maintained. Such organisms need to be conserved at functionally effective levels to maintain ecosystem processes”. Alternative D incorporates these ideas. (#331)

Response: The selected Alternative (Cm) provides a spatial mosaic of late-successional forests throughout the ANF with considerations for connecting areas of ‘least intensive use’ as described by the respondent via management area 2.2, late structural linkages (approximately 121 thousand acres under Alternative Cm). MA 2.2 ‘links’ other management areas such as designated wilderness (MA 5.1), proposed wilderness study areas (MA 5.2), national recreation areas (MA 8.2) and remote recreation areas (MA 7.2). The LRMP also provides for spatial distribution of even-aged harvest activity within the MAs that harvest timber (LRMP p. 68).

In response to the respondent’s statement, ‘Ecological research supports the idea of functioning landscapes that are made up of large blocks of forest where little or no management is happening, surrounded by areas of uneven-aged management for commodity output that also maintains mature forest cover’ suggests that functioning landscapes are not supported by matrices that include even-aged management. The relationships to microclimate (the suite of climatic variables and their associated influences from vegetation management) and biological processes such as mycorrhizal-forming fungi are complex and not well understood and should not be considered mutually exclusive with even-aged management. Alternative Cm provides for more even-aged management within the ‘matrix’ as defined by the respondent than Alternative D. However, these areas identified for even-aged management also have design criteria which will conserve elements such as reserve areas, areas of poorly drained soils, reserve trees (green and dead trees of various sizes), and coarse woody debris. See response to PI #235 for more information. In the context of vegetation management on the ANF at a landscape scale, the amount and distribution of even-aged management is considered to conserve and maintain ecological functions while providing habitat for viable plant and animal populations.

Vertical Structure

Public Interest #240: The Allegheny National Forest should collaborate with the Pennsylvania Chapter of The Nature Conservancy to develop forest management guidelines for “legacies.”

Sample Statement: Beyond desirable tree species composition and ensuring adequate forest regeneration, perhaps the single most important attribute for the maintenance and protection of forest biodiversity in managed stands is the retention of adequate standing and downed live and dead trees (legacies) of significant diameter through the harvest and regeneration phase of stand development. Due to historical harvesting regimes, Pennsylvania’s forests are largely devoid of significant large (>25cm diameter) standing and downed dead wood, or live trees. As noted in a growing body of literature, including a recent article by Lindenmayer and Noss (Conservation Biology, August 2006), forest legacies are a critical and often missing habitat element in managed forests. Numerous wildlife and plant species rely on legacies for nesting cavities, shelter, hibernacula, feeding, and reproduction. Legacies are also an important component of nutrient cycling and soil moisture regulation in forest stands. Dedicating a sufficient quantity (e.g. 10-20AB) of high quality commercial and non commercial tree species to the stand in all even-aged harvest/regeneration systems (including after final overstory removal in shelterwood and seedtree systems) creates a transitional two-age structure between even-aged and uneven-aged, providing significantly more structural diversity, future large diameter wood, and habitat quality than conventional even-aged management. Further, carrying sufficient

legacies between and through stand rotations serves as an insurance policy in the event of a regeneration failure in commercial stands...Admittedly, quantity and spatial recommendations for legacy retention between and through stand rotations adequate for the maintenance of biodiversity are lacking for most eastern forest community types. However, some notable examples of legacy retention in managed stands exist in the ANF region, including standard management practices on Collins Co. (Kane Hardwoods) forestland. In cooperation with the PA DCNR bureau of Forestry, TNC is now actively researching the legacy requirements of various species and is developing management recommendations for legacy retention in managed stands. The ANF is also a critical partner in helping TNC to develop these forest management guidelines which will have a significant and positive impact on biodiversity conservation in the eastern United States. (#330)

Response: The LRMP has standards and guidelines related to providing ‘forest legacies’ that call for the retention of standing and down woody debris, and unique and minority tree species. This includes forestwide design criteria under all alternatives that 1) restrict management activities to protect wildlife, 2) retain minority species in all harvest units, 3) retain conifer and components of understory shrubs, 4) avoid or protect water features and unique wildlife habitat and 5) provide for the retention of den trees, cavity trees, and large diameter downed woody debris (LRMP pp. 80 and 81). In addition, the ANF looks forward to continuing to work as an active partner with the Nature Conservancy to further monitor and improve our efforts to provide ‘forest legacies’. In addition, see response to PI #235.

Habitat Enhancement

Public Interest #241: The Allegheny National Forest should regenerate the oak type to benefit wildlife.

Sample Statement: Oak management - With the serious decline and mortality of American Beech on the Forest as a wide-spread source of hard mast, cavities, and den trees, I would recommend the ANF consider strongly focusing efforts on establishment of an oak component in more areas of regeneration to help sustain mast production and the more wide-spread presence of oak, as well as provide seed source for future regeneration of the oak forest. With the advance of the red maple in the eastern US and decline in oak, this should be an important issue deserving more attention than it has received to date. (#215)

Sample Statement: Acorns produced by oaks are an important food source for deer and turkey. A decrease in this food source for deer could lead to further over browsing on tree saplings, which has been a serious, well-documented impediment to the regeneration of many species of trees on the ANF and could adversely affect the carrying capacity of deer and turkeys on the ANF. (#333)

Response: We concur with your assessment of the importance of maintaining oak on the ANF due to the multiple resource benefits it provides, including a food source to deer and turkeys and the need to maintain oak was recognized during the planning process (ecological context p. 117 and LRMP pp. 14, 19 and 20). While there will be some loss of oak under all Alternatives, the preferred Alternative would maintain 85 percent of existing oak forest (FEIS pp. 3-134 and 2-233 to 2-235). Additionally, some of the 1,600 acres per year of wildlife enhancement included in the FEIS under Alternative Cm (FEIS p. Table 2-2, p. 2-48) will involve planting of oak.

For additional information, please refer to the responses to PIs #205 and 207.

Public Interest #242: The Allegheny National Forest should utilize small patch clearcuts and opening development in MA 2.2 to improve woodcock habitat.

Sample Statement: MA 2.2 should encourage small patch clear cuts and opening development for woodcock (page 3-113). (#216)

Response: Although the desired condition for MA 2.2 is to provide late structural habitat, woodcock will benefit from the 3 acre openings created through the use of uneven-age management. Forestwide design criteria states

that known locations of woodcock singing grounds, breeding areas, and migration stopover sites will be managed to sustain shrubs, small openings, and other woodcock habitat features (LRMP p. 81).

Public Interest #243: The Allegheny National Forest should monitor woodrat habitat and maintain boulder areas and cliff faces.

Sample Statement: Allegheny Woodrat - Although no recent occurrences of this species have been documented on the ANF, high quality habitat is present in and around the large boulders and cliff faces. Efforts should be made to maintain the integrity of these boulder areas and a comprehensive inventory of woodrat habitat should be undertaken. (#213)

Response: High potential woodrat habitat is evaluated during project planning. The Plan includes the following guideline to protect large boulders and cliff faces:

“To conserve key habitat components, new roads, trails, recreation facilities, pits and other developments should be located to avoid occupied habitat of species with viability concerns, including rock ledges and outcroppings, large boulder areas, bat hibernacula and historic rattlesnake dens.” (LRMP p. 80)

3.9.4 Streams, Riparian Corridors and Wetlands

Streams

Public Interest #244: The Allegheny National Forest should re-map perennial and intermittent streams at the watershed scale and adjust the inventory required.

Sample Statement: The ANF relies on USGS stream information for mapping of perennial and intermittent streams. These perennial and intermittent stream classifications are often incorrect and often go much higher into the watershed and are often more perennial than intermittent. This inventory may add up to 40% more drainage length. During pre-project work (which should be done at a watershed scale) these streams should also be re-mapped as perennial or intermittent streams (almost all intermittent streams have some amount of alluvium which defines the terrestrial riparian area) and the additional lengths of them added to the inventory. (#214)

Response: The first standard under Riparian Corridor design criteria (LRMP p. 74) states the need to define the stream type by what is identified in the field during project-level planning and implementation. Streams that do not show up on USGS maps will be added to our database as identified. Under a Memorandum of Understanding between the Forest Service and USGS, for those quads that make up National Forests, the Forest Service is responsible for updating the information on those quads and supplying that information to USGS.

Public Interest #245: The Forest Plan should include goals to address stream channel integrity and flood reduction.

Sample Statement: You might have added recovery of stream channel integrity and flood reduction as a goal and issue. This is the needed top-down recovery that can only begin on your headwater streams. Your summary...does not mention brook trout...They are a sensitive indicator species (particularly of sediment) and of enormous interest and value. (#20)

Response: The LRMP Goals in the 2500 Watershed and Air section (p. 14) provide direction to maintain or improve stream channels and provide water quality and streamflows that support desired aquatic species, including brook trout.

Public Interest #246: The Allegheny National Forest should install hardened surfaces at ephemeral stream crossings to stabilize the stream beds.

Sample Statement: The DEIS and LRMP should identify protective measures by which all activities on the ANF will leave streams and wetlands in their natural state, and incorporate best management practices to control erosion and sedimentation. We recommend the following measures to reduce development impacts on important aquatic habitats, and prevent downstream flooding and water quality degradation: If the use of culverts or bridges is not feasible on ephemeral streams, stabilize the streams at stream crossings by installing hardened surfaces (i.e., countersinking hog slats or R4 rock) at crossing points, to minimize vehicular disturbance and erosion. Countersinking these structures will allow continued up and downstream movement of aquatic wildlife. (#159)

Response: The ANF first tries to avoid or limit the need for roads to cross streams and wetlands. If they cannot be avoided, the ANF utilizes culverts, bridges, or bottomless arches for all stream crossings. This is covered in guidelines under Riparian Corridors (LRMP p. 76). Culverts are also used for cross drains under roads. If it is not feasible to utilize a culvert on an ephemeral stream, the ANF will consider this recommendation in the project specific analysis.

Public Interest #247: The Allegheny National Forest should use “fish-friendly” criteria for enclosed culverts as outlined by the Pennsylvania Department of Transportation and the Fish and Boat Commission.

Sample Statement: We agree with project designs favoring bridges and bottomless arches and culverts. When enclosed culverts are necessary, we recommend adoption of “fish-friendly” criteria developed by the Fish and Boat Commission and Pennsylvania Department of Transportation and recognized by the Department of Environmental Protection. (#63)

Response: We will consult the design criteria developed by PA DOT and the PFBC when fish passage is an issue in project planning, along with our own technical guidance we have used in the past for fish-passage design.

Public Interest #248: Management direction established in the PLRMP for Allegheny National Forest adequately protects the Allegheny and Clarion Rivers, Clarion Creek, Bear Creek, Tionesta Creek and the East Branch of Tionesta Creek as important scenic and boating resources.

Sample Statement: We note the reference to the Clarion River Water Trail and its goals of promoting stewardship and low-impact use. We support the Forest Service's concurrence on compatible use. We believe the management objectives used to evaluate all alternatives, including federal requirements, will lead to adequate protection and consideration of impact on the Allegheny and Clarion Rivers, Clarion Creek, Bear Creek, Tionesta Creek and the East Branch of Tionesta Creek as important scenic and boating resources. (#62)

Response: We agree that the management direction in the LRMP will adequately protect these rivers and streams especially with the management direction found in MA 8.1 as well as the forestwide Design Criteria standards and guidelines for 2500 Watershed and Air Management.

Public Interest #249: The Final EIS should implement the Remote Trout Stream classification for East Forest Run, Morrison Run, Pell Run and Tracy Run.

Sample Statement: I am also glad that you have retained the Remote Trout Stream classification for East Forest Run, Morrison Run, Pell Run, and Tracy Run. This is a great idea that was part of the Fisheries Amendment to the original Forest Plan. (#262)

Response: Table 26, Remote Trout Streams, in the 2500 Watershed and Air Management section of the LRMP on p. 77 lists these streams.

Riparian Corridors and Wetland Management Zones

Public Interest #250: The Forest Plan should prohibit herbicide/insecticide application, construction, logging and other earth disturbing activities inside riparian corridors.

Sample Statement: PLRMP p. II-24, 25: Riparian Corridor - While the widths given in the Standards for delineating riparian corridors are in agreement with generally accepted principles regarding riparian buffering, the management prescriptions applied are inadequate. Standards should be developed that prohibit herbicide/insecticide application, construction, logging and other earth disturbing activities inside riparian corridors. These activities are inappropriate near waterways on public lands such as national forests due to the potential for physical damage and sediment or chemical contamination. Instances where such activities in a riparian corridor are absolutely necessary should be addressed using project-specific forest plan amendments. (#329)

Sample Statement: To maximize the value of these buffers to wildlife and aquatic life, we recommend that the Forest Service prohibit mowing, removal of vegetation, filling, culverting, and timber harvesting within the boundaries of the buffers. (#159)

Response: The LRMP provides for restoring and maintaining properly functioning and vegetatively diverse riparian corridors that provide habitat for riparian dependent species (see 2500 Section of goals, objectives, standards, and guidelines). Riparian corridor activities will not occur without appropriate site-specific project level analysis, and the LRMP provides design criteria for such project level decisions (LRMP p. 53). Activities are expected to meet the goals for maintaining or restoring water quality and soil quality. The design criteria for the riparian corridor and wetlands in Section 2500 have been reorganized and clarified and new standards and guidelines have been developed (pp. 74-79). The effects of herbicide application, construction, vegetation management and other earth disturbing activities inside riparian corridors are discussed in the direct and indirect effects section of the FEIS, 3.2.3 Water Resources.

The ANF has considered impacts from vegetation management and the existing conditions in riparian corridors and has decided that it would be beneficial to allow some management in these areas. MA 3.0 surveys in 1992 determined that close to 70 percent of all riparian areas are stocked with enough ferns, grass, striped maple, and beech brush to interfere with desired tree seedlings and herbaceous vegetation. Only 10 percent of riparian areas are adequately stocked with tree seedlings on the ground (well below the 23% average for all of MA 3.0) to provide vertical structure and sustain forest cover if the overstory were to experience significant mortality or decline (USDA-FS 1995a, pp. 25-26). Avoiding all vegetation management activities in riparian corridors could promote plant interference, limit seedling development in these areas, or encourage the establishment of short-lived species (see pp. 3-41 and 3-126 to 3-130 of the FEIS). Vegetation management within the riparian corridor should meet plan objectives for 2500 Watershed and Air (LRMP p. 19) and avoid downstream effects to stream temperature (LRMP p. 75). It is important to note that this objective proposes to improve structure and composition of vegetation on 50 to 100 acres a year in riparian corridors, or less than 0.3% of the estimated riparian area of the ANF. These treatments will be site-specific and carefully designed to meet the riparian corridors design criteria (LRMP pp. 74-76) and maintain soils, hydrology, and riparian dependent species. A new guideline has been added to limit the types of equipment used in riparian corridors and limit compaction and rutting (LRMP p. 75). In addition, there are many riparian areas on which vegetation management will be prohibited due to steep slopes or wet soils and that are in MAs that will not allow scheduled vegetation management. Within ANF lands that drain directly to the unimpounded section of the Allegheny River, vegetation management (except for treatment of NNIS) should not occur in the riparian corridor. In these areas, natural processes will be the primary agents of change.

Herbicide use is needed to help achieve compositional and structural vegetative diversity in riparian corridors. These treatments will only occur on a small portion of riparian corridors (see FEIS, direct and indirect effects section of 3.2.3 Water Resources). The buffer strategies developed within the environmental risk assessment for

glyphosate (pp. G2-55 to G2-59) and sulfometuron methyl (pp. G2-67 to G2-70) are conservative and are expected to protect water quality. The monitoring program by ANF in 2003 and 2004 for glyphosate and sulfometuron methyl has shown that very little or no damage occurs to vegetation outside of the intended treatment area (pp. G2-56 and G2-69). Water quality monitoring for silvicultural activities in 1987, 1988 and 2002 showed no detectable concentrations of glyphosate in water samples (p. G2-56) and in 1990 and 2002 showed no detectable concentrations of sulfometuron methyl in water samples (p. G2-69). For additional discussion relating to herbicide buffers, refer to PI #194 in the herbicide section.

It may be necessary to consider using insecticides in order to protect tree health and vigor (for example, using an appropriate insecticide to limit hemlock mortality/decline from hemlock woolly adelgid). For additional discussion relating to insecticides, refer to PI #191 in the herbicide section.

The riparian corridor design criteria are consistent with the PA Department of Conservation and Natural Resources Forest Management Plan and the PA Department of Environmental Protection's Best Management Practices. Both of these guidelines are designed to protect water quality and habitat (see FEIS, direct and indirect effects section of 3.2.3 Water Resources). The following guideline on p. 75 of the LRMP has been clarified and it now specifically refers to Table 24 on p. 75 of the LRMP: "Avoid construction of new facilities, roads, oil and gas developments, motorized trails, landings, and buildings within riparian corridors." New roads will likely be constructed more than 300 feet away from streams because this is identified as the distance where roads are likely to impact stream sedimentation or streamflows. Roads constructed within 300 feet of streams would require non-erosive surfacing and improved mitigations to reduce impacts to streams; therefore they will be more expensive to construct.

Finally, it is important to note that while some of these activities are permissible in riparian corridors, the majority of activities on the ANF will be outside the riparian corridor and located further away from water resources than riparian corridor direction.

Public Interest #251: The Forest Plan should increase buffer protection around water resources.

ADOPT PA DCNR GUIDELINES

Sample Statement: The Pennsylvania Department of Conservation and Natural Resources uses the following guidelines to protect vernal pools, a unique and critical habitat for amphibians. We recommend adoption of DCNR's 200 foot buffer in the Allegheny National Forest Plan, since we believe the DCNR standard to be better defined and more protective. (#63)

ADOPT 200 METER BUFFERS FOR WETLANDS AND EXCEPTIONAL VALUE STREAMS

Sample Statement: Increase wetland (all wetlands, especially seeps and vernal pools) to 200 meters. More specifics per wetland type and individual wetland may alter individual buffers...In order to prevent stream sedimentation and decreases in stream flow, larger buffers (200 meters) are recommended for development activity within designated Exceptional Value streams, as well as 100 meter buffers for all other streams. (#95)

ADOPT A 150 FOOT BUFFER AROUND ALL AQUATIC AREAS

Sample Statement: The DEIS and LRMP should identify protective measures by which all activities on the ANF will leave streams and wetlands in their natural state, and incorporate best management practices to control erosion and sedimentation. We recommend the following measures to reduce development impacts on important aquatic habitats, and prevent downstream flooding and water quality degradation: Maintain a minimum 150-foot buffer around all aquatic areas, including streams (ephemeral, intermittent and perennial), wetlands, and vernal pools. (#159)

Response: The design criteria for riparian corridors and wetlands in the LRMP 2500 section have been reorganized and clarified and new standards and guidelines have been developed (pp. 74-79). The standards and guidelines are designed to protect against sedimentation and alteration of streamflows from activities in watersheds (see FEIS: 3.2.3 Water Resources- direct and indirect effects).

See Table 24 (LRMP p. 75) for the recommended minimum width of the riparian corridor. The actual riparian corridor will be defined on the ground for sites where the floodplain is larger than the distances in Table 24. Buffers will also be adjusted depending on the slope adjoining streams. For instance, where slopes adjoining perennial streams are greater than 25 percent, the riparian corridor distance will exceed 150 feet.

Although specific direction for ephemeral streams has not been provided in the LRMP, the ANF has determined that necessary protections are in place to protect stream channels. As intermittent streams are defined in the FEIS, they include any stream with a defined bed and bank that transports water, sediment and organics and flows for only a portion of the year. Intermittent streams will have a buffer of 50 feet plus 2 feet for each 1 percent slope. Ephemeral streams that do not have a defined bed and banks, such as swales, will be protected through limiting soil disturbance and utilizing approved crossings for skid trails in these areas. In addition, the riparian corridor standard on p. 74 would provide for the identification of riparian corridors based on soils, vegetation, and hydrology. During this identification, protection for ephemeral channels will be applied, where they are identified as important for maintaining water quality or plant and animal habitat. Some swales may meet wetland criteria, and would then be protected with the wetland design criteria (LRMP pp. 77 and 78).

The ANF agrees that the protection of surrounding habitat around wetlands, seeps, and vernal pool is important to amphibians. In response to your comments and review of supporting literature (Semlitsch and Bodie 2003; Calhoun and deMaynadier 2004), the ANF has increased protection of vernal pools, wetlands, springs, and seeps. This direction and improved definitions of these resources is included in the LRMP 2500 Section under Wetlands, including springs, seeps, and vernal pools (pp. 77 and 78). The first standard states: “Wetlands, including springs, seeps, and vernal pools, that may be affected by a project will be identified during project planning or implementation.” This will include mapping and protecting wetlands prior to implementation. If additional distance is needed to protect amphibian habitat around a wetland, this distance would be recommended by a specialist. In the FEIS, Indicator 2 Habitat Composition under 3.3.2 Plant and Animal now discusses the importance of the habitat surrounding vernal pools and seeps to amphibians.

The riparian corridors and wetlands design criteria in the LRMP (pp. 74-79) are similar to the PA Department of Conservation and Natural Resources Forest Management Plan and the PA Department of Environmental Protection’s Best Management Practices. Please see response to PI #250 for additional information.

Public Interest #252: The Allegheny National Forest should limit harvest and activities within 50 feet of the top of the banks of waterways to those activities that benefit the riparian corridor.

Sample Statement: Limit harvest and activities within 50 feet of the top of bank to those activities that benefit the riparian area and integrity of the waterway. This is consistent with regulation of encroachments along Commonwealth waterways in Chapter 105 Regulations. Section 105.1 of Dam Safety and Waterway Management Regulations use FEMA identified floodways, or in the absence of designation, 50 feet from top of bank to regulate encroachments on streams. Adoption of such a standard would assist statewide consistency. Necessary crossings would be minimized as stated in your plan and specifications can be reviewed by appropriate agencies as needs arise. (#62)

Response: The ANF has changed the wording for stream channels from “the edge of the channel” to “the top of the channel bank.” (LRMP p. 74) The ANF agrees that activities within 50 feet of waterways should be minimized. Although 50 to 100 acres of vegetation management may occur in riparian corridors each year, only a small portion of this amount is expected within 50 feet of stream channels because the intensity of vegetation

management would decrease as our treatments get closer to streams (i.e., selective harvest within 50 feet). See pp. 74-76 of the LRMP for relevant guidelines.

Public Interest #253: The Allegheny National Forest should allow foot travel in riparian areas.

Sample Statement: Some of the statements in the draft plan make me a little nervous in regard to non-motorized trails. One is the statement that trails will be discouraged in riparian areas. Riparian areas on the Allegheny plateau are practically the only area of interest on a foot trail. I don't think foot trails cause nearly the damage that ATV or equestrian trails would. I realize that the plan also says that potential damage could be mitigated, but it almost sounds like there won't be any new footpaths developed in the future. (#162)

Response: The design criteria for the Riparian Corridor and wetlands in LRMP 2500 have been reorganized and clarified and new standards and guidelines have been developed (pp. 74-79). The guideline you had a concern about has been edited and no longer includes all trails. Only construction of motorized trails should be avoided in riparian corridors. Mitigation will be applied to all trails to minimize or prevent erosion and sedimentation into streams.

Habitat Enhancement

Public Interest #254: The Allegheny National Forest should prioritize restoration of riparian areas.

Sample Statement: Additionally, give limited resources to restore riparian areas in the ANF; we would encourage an explicit prioritization of streams where this work should occur first. Our analysis shows a number of high aquatic diversity streams and their watersheds and we would offer these as primary candidates in which to consider riparian assessments, restorations, and road surface improvements. (#95)

Response: The ANF agrees that it is best to focus the restoration of riparian areas on priority watersheds. However, this is an implementation decision that will be influenced by funding availability. We welcome any information on high diversity streams to aid in this prioritization. Also, the ANF evaluates the condition of watersheds when completing projects.

Public Interest #255: The Forest Plan should emphasize aquatic habitat restoration and enhancement projects for native species.

Sample Statement: Page III-23: "Habitat restoration/enhancement projects should only occur where water quality is suitable for the propagation of aquatic species." Which species are being referred to? Different aquatic organisms require different habitat for successful propagation. Recommendations: Emphasis should be on habitat restoration/enhancement projects for native species, which excludes brown trout and stocked brook trout fisheries. Habitats of native, reproducing populations of non-stocked brook trout should be of conservation concern, as well as naturally functioning macroinvertebrate communities (i.e. appropriate feeding guilds and trophic structure for stream type are present) and native unionids in the larger stream systems. (#95)

Response: The objective (LRMP p. 20) related to this guideline has been made to include the word native, but desired non-native was added as well. The ANF realizes that different species have different habitat requirements, and this would be assessed as the time and opportunity exists to do this type of work. Native species will be emphasized in any effort, but there may be instances where desired non-native species are considered as well.

Public Interest #256: The Allegheny National Forest should use only native species for revegetation adjacent to streams and wetlands.

Sample Statement: We recommend the following measures to reduce development impacts on important aquatic habitats, and prevent downstream flooding and water quality degradation: Where re-vegetation is required, only native species should be used. (#159)

Response: This is covered in the second guideline in the LRMP Part 3 Design Criteria, section 2070 Biological Diversity (p. 53), which limits revegetation to native or desired non-native species.

Public Interest #257: The Allegheny National Forest should emphasize aspen regeneration in riparian areas.

Sample Statement: Page 3-114 identifies 2,500 acres of aspen (c 1%) left on the forest. This is a decrease of 7,500 acres from 1986. Aspen occurs more frequently in riparian areas. Wildlife utilizes aspen for cover and food. It is important that aspen be managed. In the 2000 Plan amendment the forest estimated 3,200 acres of aspen. Clear cuts for aspen regeneration should be allowed in the riparian corridor, to prevent further loss of aspen. (#216)

Response: The 1986 Forest Plan (USDA FS, 1986a, Table 4-25, p. 4-94) indicates 10,000 acres of aspen existed then. The current FEIS (Table 3-18, p. 3-85) indicates 2,700 acres of aspen forest type. This change results primarily from better current data and forest type delineation than existed in the early 1980s rather than a loss of 7,300 acres of aspen. These 2700 acres represent lands where 50 percent or more of the tree species composition consists of aspen. It is quite likely that a substantial portion of the 7,500 acres identified in the 1986 Forest Plan actually had less than a 50 percent aspen component then.

We concur that it is important to sustain the aspen component on the ANF due to its contribution to tree species diversity and the value it provides to wildlife. During decades 1 and 2, ANF personnel plan to sustain the 2700 acres of the aspen component that exist today (FEIS Tables 3-25 and 3-26, p. 3-134). In the LRMP, there is a 2400 Vegetation objective to “maintain or enhance the existing aspen component with an emphasis on regenerating decadent clones and/or stands greater than two acres” (LRMP p. 19). A 2400 Vegetation guideline for MA 2.2 provides for regenerating aspen using even-aged management in areas up to 20 acres in size (LRMP p. 111). MA 1.0 also provides for the regeneration of aspen (LRMP pp. 102 and 104).

Riparian corridors would be managed to sustain forest cover, which would include sustaining the aspen component through even-aged management when it occurs there (FEIS, p. 3-40). These treatments will need to be analyzed on a site-specific basis to weigh the positive and negative effects of this. With proper layout and design, some management may be able to occur without impacting stream temperature or riparian ecosystems.

Public Interest #258: The Allegheny National Forest should conduct small clear cuts in the riparian corridor to regenerate wetland shrubs and create woodcock habitat.

Sample Statement: On page 3-33, small clear cuts should be allowed in the riparian corridor to allow for regeneration of wetland shrubs to create woodcock habitat. (#216)

Response: Design criteria are included that permit management to enhance native shrubs, as well as reduce potential impacts to riparian areas from invasive species (LRMP p. 75). The type of treatment will be determined at the project level. With proper layout and design, some management may be able to occur without impacting downstream water uses or riparian ecosystems.

Public Interest #259: The Allegheny National Forest should reconsider the use of the term “enhancement” when referring to timber management in riparian areas.

Sample Statement: We have some concern over the term “enhancement” as used to refer to thinning of riparian forests. The need for this practice seems to be oriented to timber management and not to establishment and maintenance of riparian buffers and corridors. Restoration and establishment of vegetation, especially forest, should be the primary management focus of riparian areas. (#95)

Response: The ANF agrees that restoration and establishment of vegetation, especially forest, should be the primary management focus of riparian areas. Throughout the majority of the ANF, activities will be limited in riparian corridors to allow natural processes to be the primary agents of change. However, within the riparian corridor there exist several forest health concerns that can be improved through the use of selective cutting, thinnings or small group openings. Treatments will occur on 3.3 % percent or less of the suitable areas in riparian corridor on the ANF per decade. These treatments will be used to improve the composition and structural diversity in the riparian corridor. Avoiding all vegetation management activities in riparian corridors could promote plant interference, limit seedling development in these areas, or encourage the establishment of short-lived species (see FEIS pp. 3-41 and 3-126 to 3-130). Please refer to PI #250 for more information about activities in riparian corridors.

Public Interest #260: The Forest Plan should provide a management initiative to enhance habitat for sensitive or state endangered or candidate fish species.

Sample Statement: We suggest addition of a management initiative that allows enhancement of habitat for sensitive or state endangered or candidate fish species. The species would likely be most affected by land use perturbations. (#62)

Response: The LRMP provides a Goal statement on p. 14 that addresses the comment. Under the 2600 section, the second statement speaks to the conservation and enhancement of habitat integrity for species with viability concerns, which includes several fish species.

3.10 Fish, Wildlife and Plants

3.10.1 General

Public Interest #261: The Final EIS should identify the cumulative effects of the preferred Alternative on fish and wildlife species.

Sample Statement: The DEIS and LRMP do not adequately identify the effects of the various alternatives on fish and wildlife resources within the boundaries of the Allegheny National Forest. Of particular concern are the possible effects of the preferred alternative (Alternative C) on endangered species, aquatic resources, and forest interior bird species, none of which are adequately addressed in the DEIS or the LRMP. (#159)

Response: The cumulative effects of the preferred Alternative (Cm) to fish and wildlife species are discussed in Chapter 3 of the FEIS under Plant and Animal Habitat beginning on p. 3-261 of the FEIS. Here, six indicators are used to evaluate the effects of all the Alternatives on habitat diversity, including Alternative Cm. The six indicators are listed in more detail on p. 3-184 of the FEIS.

A detailed analysis of the potential impacts to federally listed threatened, endangered, and candidate species is also provided in the Biological Assessment. Aquatic resources are addressed in both the 2500 Water Resources section and the 2600 Plant and Animal section. Forest interior birds are addressed under Habitat Indicator 3 – Changes in Habitat Patterns on the Landscape (FEIS p. 3-191).

3.10.2 Species with Viability Concerns

General

Public Interest #262: The Final EIS should include more detailed analysis of species with viability concerns.

Sample Statement: The Forest Service's "analysis" regarding the species they did identify as having viability concerns (DEIS App. E) was far too cursory and is not clearly tied to any more specific analysis or proposed management plan provision or specific monitoring requirements. This is supposedly part of the "fine filter" but its results are hard to find. Indeed the habitat required for some of the identified species is not even noted in these cursory summaries. See, for example, golden-winged warbler, yellow-bellied flycatcher. There is almost no scientific literature cited in the cursory paragraph provided for each species. The analysis identifies a number of management concerns such as beech health and the need for more early successional habitat but those concerns are never tied to any viability issue regarding any species. Are there species whose viability would be of concern if less early successional habitat were created? Are there species that depend on a beech forest? Indeed one has to read Appendix E extremely closely to catch the one, very brief reference to the species "long forms" which contain more detailed information and which are only available in the project file. (#327)

Response: A summary of the results of the SVE is contained in the plant and animal section of the FEIS. The detailed SVE is contained in Appendix E of the FEIS. The information presented in the FEIS and Appendix E contain, in detail, anticipated effects of proposed management actions. As a result, these documents contain adequate information to assess impacts to species with viability concerns.

The complete SVE is documented in the FEIS and project record. In addition, the ecological context, Biological Evaluation and Biological Assessment, all of which are available on the ANF website and the project record, contain information related to species with viability concerns. In addition, see response to PIs #86, 220, 268 and 270 related to additional analysis that has been added to the FEIS related to address species with viability concerns.

Public Interest #263: The Allegheny National Forest should expand the list of species with viability concerns by using regional species lists, not just species occurring within the proclamation boundary of the forest.

Sample Statement: The Forest Service states: "in order for a species to be evaluated, it must have documented occurrence within the ANF proclamation boundary and be recognized by taxonomic experts." (DEIS at E-2) This standard is far too restrictive and does not follow what other National Forests have used in evaluating which species to identify as having viability concerns. For example, in the Green Mountain National Forest (GMNF) in Vermont and the White Mountain National Forest (WMNF) in New Hampshire, the Forest Service there started the process for determining which species to include in their list of species with viability concerns as follows: "first, existing lists or other compilations of potentially rare species in New England were reviewed. From these, two large lists (one for animals, one for plants) of species that might be at-risk were developed." (Species Viability Evaluations, FAQ, White Mountain and Green Mountain National Forests, pg. 1) (#327)

Sample Statement: The species evaluation was inadequate. The standards were too strict for the evaluation. The Green Mountain and White Mountain National Forest looked at all of New England in their species evaluation. The Allegheny looked at the Allegheny and not the broader region. (#351)

Response: The species viability process began with a list of more than 300 animals and more than 1200 plants (FEIS p. 3-206). This process closely followed that completed by the Green and White Mountain. Species experts were used to narrow the list to 78 species. The process is clearly outlined in Appendix E of the FEIS. The first

step in the process was the Ecological Context which assessed ecological conditions at several broad scales including the Mid-Atlantic Region.

Public Interest #264: The Forest Plan should prevent a decline in species viability.

Sample Statement: Declining species viability under the Draft Plan Alternatives violates sustainability requirements for federal forests, which is based on the premise “to keep in existence”. (#295)

Response: The direct and indirect effects of Forest Service actions and the cumulative effects of all activities on 78 species with viability concerns were analyzed. In the short term, all of the Alternatives are expected to sustain populations of all species. However, over the long term the analysis suggests that the direct and indirect effects of management activities may increase viability risks for the timber rattlesnake. The Species Viability Evaluation (SVE) recognizes the degree of uncertainty associated with making long term assumptions for this species. Therefore a high priority will be placed on monitoring this species to ensure that Forest Service actions will not lead to the extirpation of this species within the planning area. Seasonal road closures and trail relocation or redesign will continue to be used as appropriate and where monitoring indicates a need for additional mitigation.

The SVE also considered the cumulative effect of all factors at play on the ANF including OGM development, the anticipated loss of conifer due to hemlock woolly adelgid, the increase in non-native invasive plant species and the anticipated establishment of the zebra mussel in the Allegheny River. The cumulative effects analysis indicates future reductions in the distribution and persistence of some species. However, the ANF has a limited ability to improve upon these outcomes because they are primarily the result of non-Forest Service actions as described in the no Forest Service activity scenario (minimum benchmark analysis) (FEIS Appendix E).

Public Interest #265: The Forest Plan should promote and protect suitable, but unoccupied, habitat for species of concern.

Sample Statement: The list of specific habitat types to be promoted and protected (Known active great blue heron colonies, known occupied Allegheny woodrat nesting/denning sites, known occupied northern flying squirrel nesting sites, etc.) should include “suitable” habitat in addition to “known” and “active” sites/territories. Limiting priority protection to “known” and “active” sites is unnecessary and unwise. Existing unoccupied but “suitable” habitat for these species should be protected. Such areas are vital for providing space into which increasing populations can expand in the future. (#329)

Response: While the list of forestwide objectives (LRMP p. 20) focuses largely on known locations of species with viability concern as suggested, this is only one part of the overall Forest strategy of ensuring that habitat is provided for species with viability concerns. Forestwide goals of 1) maintaining and enhancing the distribution and diversity of high quality habitat across the landscape, 2) contributing to the conservation and enhancement of habitat for species with viability concerns and 3) providing connectivity, interior habitat and remote habitat (LRMP p. 14) all contribute toward maintaining suitable habitat conditions for species with viability concerns. Additionally, the LRMP includes forestwide (LRMP pp. 53-99) and Management Area design criteria (LRMP pp. 102-167) that help ensure habitat for all wildlife is maintained. As a result, management efforts related to species with viability concerns are not “limited” only to protecting known habitats as suggested. They include a comprehensive strategy, including forestwide monitoring (LRMP pp. 37-52), to ensure that suitable habitat for all wildlife, including species with viability concerns, is maintained.

In addition, see response to PI #439 related to the forestwide strategy for ensuring species viability.

Mammals

Public Interest #266: The Final EIS should define the optimum and suitable vegetative habitat conditions for the Indiana bat and disclose whether components of that condition already exist on the forest.

Sample Statement: Under Part II - Strategy, 2006 Wildlife, Fish and Sensitive Plant Habitat. I question the objective of “providing optimum and suitable vegetative habitat for Indiana bats on a minimum of 30 percent of the ANF.” What is “optimum and suitable” vegetative habitat and what does it take to achieve that? I believe that many of the components of that condition objective already exist on the Forest. (#215)

Response: Optimum Indiana bat roosting and foraging habitat occurs when dominant overstory canopy closure ranges between 50 to 80%. Suitable habitat is more than 80% and between 30% and 50% canopy closure. These percentages are part of the Indiana bat habitat suitability model (see Biological Assessment). Optimal habitat conditions are often achieved through partial harvest treatments such as thinnings and shelterwood-seed cuts.

Public Interest #267: The Forest Plan should provide habitat enhancement for and monitoring of the northern flying squirrel.

Sample Statement: A high priority should be placement of nest boxes throughout conifer bottoms to monitor this species. Management activities that remove large conifers should not occur until NFS boxes have been in place through a minimum of one season and no NFS have been documented in the area planned for disturbance. The projected arrival of the Hemlock wooly adelgid and the continuing increase in oil and gas exploration on the ANF increases the urgency to fully document the distribution of NFS on the ANF and the threat they may pose to quality ANF habitat. (#213)

Response: The northern flying squirrel is discussed in Appendix E, the monitoring plan (LRMP p. 47), and the project file. We agree that monitoring the northern flying squirrels is a high priority as indicated in the monitoring section.

Birds

Public Interest #268: The Final EIS should include a more detailed analysis of the viability of the cerulean warbler.

Sample Statement: The Forest Service concludes that the cerulean warbler, which is one of only four MIS, does not have serious viability concerns (outcome B) under any of the proposed alternatives. This conclusion and its underlying analysis is seriously flawed and is based on a very selective and biased reading of the available scientific literature...It is really undisputed scientifically that this species is “area sensitive” and in order to assure its presence and reproductive success, the most reliable method is to set aside large tracts, with substantial unfragmented core areas. See Long Form at 13 and 16. There is some variance in the literature regarding the minimum size for these areas, but there appears to consensus that areas of at least 1000 ha are required. See e.g., Hyde, D., Thomson, D., and J. Legge. 2000, Special animal abstract for Dendroica cerulean (cerulean warbler), Michigan Natural Features Inventory, Lansing, MI, 4 pp. See also Robbins, et al, 1989, cited in DEIS and cited by every major source as one of the definitive studies regarding the habitat requirements of this species...The DEIS never identifies the core areas in the ANF that exist, are relatively protected from future fragmentation and that can provide sufficient habitat to insure the viability of the Cerulean Warbler on the ANF...Allegheny State Park in New York, which is adjacent to the ANF contains one of the Allegheny Plateau's largest known populations of this declining bird species. The DEIS acknowledges, but never really addresses the significance of, the fact that Allegheny State Park is not subject to active management activities like commercial logging or oil and gas development. The long form recommends that all remaining large blocs of suitable habitat for this species be identified and protected but the DEIS does not bother to do this. The DEIS correctly explains that the Cerulean Warbler in the ANF is found almost exclusively in areas that are predominantly oak. Moreover the DEIS also correctly notes that the

species is “area sensitive” and generally requires large areas of mature forest with a canopy. Several studies have also suggested that the species may be less area sensitive in areas that are more heavily forested and, based on observations of the species in recent shelterwood cuts and similar openings, other studies suggest that the warbler may tolerate a certain level of canopy gaps. However, the DEIS then, quite incorrectly and arbitrarily, morphs these “suggestions” and “tolerances” into a conclusion that canopy gaps are actually “required habitat” for this species and that because the Allegheny Plateau is heavily forested, the species is not area sensitive in the ANF...Moreover although the scientific sources cited by the Forest Service expressly note that mere occurrence does not necessarily indicate quality habitat. The long form also acknowledges that single sightings of these birds in an area do not establish that there are breeding populations. (at 11), but then the long form goes on to use such sightings as a basis for concluding that the species requires canopy openings.(at 22-23)...The long form for this species does not even mention oil and gas development as a threat. The Forest Service can cite no study which says that the long-term clearings needed for oil and gas wellpads and the accompanying and essentially permanent roads do not fragment the forest in a way that adversely impacts the Cerulean Warbler. Because such clearings and roads remove all vegetation and create multiple, closely spaced openings the likely adverse impacts on a species that prefers large, mature trees in large blocs of unfragmented forest seem self-evident. (#327)

Response: As suggested, the FEIS contains more in-depth discussion related to the cerulean warbler. Specific information that has been added includes range wide research related to preferred landscape conditions and tract size, use of canopy disturbances and open canopy conditions, more current information related to nest predation and fragmentation, documented use in relation to road density, and site specific nest requirements (FEIS pp. 3-198 to 3-201, 3-214 to 3-215 and 3-233 to 3-238). In addition, the literature provided by the respondent has been reviewed and although cerulean warblers on the ANF utilize upland forest to a greater extent than preferred habitat described in the Michigan study, information on status and trends, use of bottomland and floodplain habitat, recognition of this species preference for larger tracts of land, its preference for large diameter trees, threats, and use of low intensity timber harvest for cerulean warbler management, is consistent with the information included in the FEIS (pp. 3-198 to 3-201).

In addition to nest site characteristics, the FEIS also discusses landscape considerations and the analysis presented shows that preferred landscape conditions consisting of predominately late structural conditions will be provided on between 53% and 78% of the Forest under the Alternatives considered (FEIS p. 3-238) and that the preferred Alternative, will maintain 61% of the suitable habitat in a landscape condition preferred by the cerulean warbler. Table 3-54 also displays the amount of high quality remote habitat that will be provided and under the preferred Alternative, 88% of existing high quality remote habitat will be maintained, habitat connectivity will be provided on 23% of the ANF, forestwide core habitat will increase by over 50% and there will be a seven-fold increase in the amount of late structural forest (FEIS p. 3-220). As a result, in addition to providing nest site conditions that are utilized by the cerulean warbler on the ANF, all Alternatives also maintain landscape conditions required by this and other area sensitive species (FEIS pp. 3-238 to 3-239).

It is suggested by the respondent that because it is not subject to timber harvest and development, that the Allegheny State Park provides higher densities of cerulean warblers. However, density estimates used by Baird and those used on the ANF were calculated differently and cannot be directly compared. In addition, Baird documented a gypsy moth outbreak at his sample sites during the survey period. This outbreak would have altered food abundance on a local scale and produced canopy openings, both of which could have affected cerulean warbler densities on the sites sampled. For these reasons the ANF does not agree with the respondent’s interpretation of Baird’s data.

Finally, information included in the FEIS includes data from over 50 documented sites on the ANF. There certainly is range-wide variation in preferred habitat, and although the respondent disagrees with the assumptions related to canopy closure and nesting, data presented in the FEIS (pp. 3-233 to 3-238) contains the most accurate information available related to habitat use of the cerulean warbler on the ANF. Further, as documented in the

FEIS, information presented is supported by scientific literature, as well as Forest monitoring (FEIS pp. 3-198 to 3-201, 3-214 to 3-215 and 3-233 to 3-238).

See also the response to PI #95, related to changes in the FEIS and the application of forestwide design criteria to oil and gas development.

Public Interest #269: The Forest Plan should provide oak habitat for cerulean warblers.

Sample Statement: The DEIS states that oak is important for cerulean warblers, yet there is little oak in MAs that will insure its regeneration. This seems counter to what an MIS is suppose to trigger in terms of management, especially in response to a species as imperiled as the cerulean. (#106)

Response: As described on p. 3-235 of the FEIS, Alternative Cm will maintain the greatest amount of oak of all the Alternatives considered due to the levels of regeneration harvest and associated reforestation treatments proposed. Additionally, available habitat for the cerulean warbler will also be well distributed and will continue to exist in all watersheds where it presently occurs. For these reasons, the preferred alternative will continue to maintain a predominance of suitable habitat across the landscape and management under this alternative will ensure that the forestwide viability for this species is maintained (FEIS p. 3-239). The anticipated forest composition resulting under each of the alternatives is also discussed on pp. 3-132 to 3-135 and 3-159 to 3-161 of the FEIS.

Public Interest #270: The Final EIS should include a more detailed analysis of northern goshawk viability.

Sample Statement: “The Northern Goshawk is a raptor bird species that prefers older forest habitat, featuring conifers and open understories. The Goshawk is sensitive to human disturbance” (DEIS at 3-160). The research available on the Goshawk in Pennsylvania primarily comes from Kimmel and Yahner (1994). For this reason, the location of Goshawk nests were used to help identify good old growth corridor habitat. The Draft EIS includes a discussion of the viability of the northern goshawk on page E-28. The conclusion for the Goshawk's viability status can be found on page E-34. It is impossible, from the information available in the Draft EIS, to determine what the rationale for the viability outcomes is...Of the twenty three active Goshawk nest sites in the Allegheny National Forest, there is only one one-acre opening within 330 feet of an active nest (SVE, pp. 11-12). Furthermore, only 2.5% of the habitat within a 1/4 mile of the nest site is in openings or non-forest (SVE, p. 11). Forest-wide, 12% of habitat is labeled as opening or non-forest (DEIS, p. 3-78). It is difficult to understand how the Goshawk is representative of forest with small openings and early structural habitat patches when it is clearly avoiding areas with even small amounts of non-forest habitat...The discussion within the Draft EIS focuses on the availability of mature forest habitat. That is a partial implementation of a coarse filter. The reason that it is not a full implementation, is because the Goshawk is not simply dependent on an overbroad definition of mature forest. In fact, there are significant amounts of mature forest that the Goshawk does not use. The Goshawk avoids oak forest, steep sloped areas, and areas close to medium use roads. Using a coarse filter to identify available habitat based on these habitat parameters would have provided useful information. However, it would not have concluded that 75% of the forest is good habitat, which is what the incomplete coarse filter analysis in the DEIS concluded...The DEIS does a good job of acknowledging that the Northern Goshawk is dependent on a combination of coarse filter criteria: “Comparisons of landscape habitat surrounding these nests indicated that in the Northern Hardwood Region (which includes the ANF), goshawks selected nest sites with the following parameters; 1) extensive forest, 2) nest sites farther from medium and heavy duty roads, buildings and forest edges, 3) nest sites near to tops of plateaus and on relatively level ground and 4) nest sites with a mixed or coniferous forest component.” (p. 3-168) However, when it comes to defining objectives for determining impacts to the Goshawk the Forest Service narrows this criteria primarily to a single, overbroad criteria that “Maintain >70% forest cover and > 50% high forest canopy (for example forest greater than 50 years of age).” This overbroad criterion is then used to determine potential impacts of the proposed plan on the Northern Goshawk. The overbroad criteria of using >70% forest cover and >50% forest canopy is simply inconsistent with the literature and the Forest

Service's own findings in the Species Viability Evaluation Data Collection Form...The discussion within the Draft EIS does not contain any kind of a fine filter. There is no attempt at all to look at internal habitat characteristics such as the under stories that Goshawk prefer to nest within, or the fact that Goshawk will select American beech for nesting sites despite the overwhelming availability of other tree species such as black cherry. Furthermore, despite the Goshawks well documented preference for large Unroaded Areas, there is no analysis outside of Intensive Use Areas to determine what the proposed plans impacts would be to these vital habitats in relation to Goshawk nesting success. This last point is particularly disconcerting because of the analysis done on intensive use areas which documents a decline in quality habitat across all proposed alternatives (p. 3-193) and the determination that Goshawk will likely decline due to oil & gas drilling activity...The DEIS claims on page 3-169 that the proposed LRMP set a goal of 50 nesting pairs. However, we searched the Forest Plan and could find no such goal. Furthermore, the proposed Forest Plan itself inaccurately describes the Goshawk as a species that uses oak forest habitat, when in fact the Species Viability Evaluation in the project file clearly documents that the Goshawk avoids the oak forest types (despite its preference to large unroaded areas and the predominance of this forest type in those areas) (proposed LRMP, p. D-1). While the proposed LRMP includes standards for protecting known nests, it provides no standards or guidelines that will reasonably ensure that viability could be ensured for this species. In fact, the DEIS determines that this species will likely decline under the proposed plan, but provides no goals for increasing its habitat or ensuring that its basic habitat criteria of extensive forest cover, unroaded habitat, gentle slopes, minimal human disturbance, and older forests will be preserved adequately (proposed LRMP at III-30). Furthermore, the monitoring requirements for this species do not even require that habitat meeting that defined in the DEIS on page 3-169 will actually be monitored, let alone preserved (proposed LRMP, p. II-32). (#327)

Response: We agree with the respondent that the FEIS should contain a more detailed analysis of the northern goshawk and a number of changes were made between the DEIS and FEIS. These changes included; 1) the northern goshawk has been added to the Regional Foresters Sensitive Species (RFSS) list, 2) a more comprehensive analysis of all known nests was conducted and this information is presented in the Biological Evaluation (BE) (pp. 144-148), 3) using information provided by partners, 43 goshawk territories were identified and analysis presented in the FEIS and the BE includes an assessment of territories, as well as nest sites, 4) because of concerns related to increasing cumulative effects, greater protection is provided to known nests through forestwide design criteria (LRMP pp. 84 and 85) under Alternatives B, Cm and D and 5) in an effort to reduce potential impacts from oil and gas, to the extent that they can be applied (ROD p. 29), forestwide design criteria will be applicable to oil and gas development on National Forest System lands under Alternatives B, Cm and D.

In addition to requesting further analysis related to the northern goshawk, the respondent also raises a number of concerns and perceived inconsistencies and each of these are addressed separately below:

- “The northern goshawk is a species preferring older forests, conifer, open understories and is sensitive to disturbance and it is impossible to assess viability from the information provided in the DEIS.” Habitat preferences and effects related to the goshawk presented in the FEIS, are based on a more comprehensive assessment of over 70 nests and 43 territories and include information on preferred habitat and use, landscape considerations and forest population estimates. As a result, the information presented in the FEIS (pp. 3-196 to 198, 3-230 to 3-232 and 3-268 to 3-270) and BE represents the best information available related to goshawk habitat and use on the ANF. Additionally, because the forest contains detailed information on habitat and use for this species and considering this information is based on over 15 years of monitoring, it is felt that the FEIS contains adequate information to assess the viability for this species.
- “The analysis presented in the DEIS is inaccurate and the goshawk clearly avoids areas with even small amounts of non-forest habitat”: As described on p. 147 of the BE, although openings are generally

selected against during nest site selection, within territories, openings were selected at levels close to their forestwide availability, which is consistent with research that indicates that forests ideal for producing prey contain small to medium openings (BE p. 139). Additionally, while the respondent disagrees, as shown in Table 42 of the BE, small openings are found near some goshawk nests on the ANF, although suitable nest habitat only includes forested lands (FEIS p. 3-231).

- “A coarse filter analysis needs to be conducted to identify suitable habitat and needs to consider topography, oak forest and proximity to roads”: A coarse filter analysis was completed and is summarized on pp. 133-148 of the BE and includes an analysis of forest type, elevation, aspect and slope, as well as a spatial analysis of roads and well densities. Additionally, analysis provided on p. 3-269 of the FEIS, utilizes information provided by this analysis to identify unsuitable goshawk habitat, or habitat avoided, as suggested.
- “A coarse filter analysis would not have concluded that 75% of the Forest is suitable habitat”: While the respondent disagrees with the amount of suitable habitat provided under each of the Alternatives (FEIS p. 3-231), assessment provided in the FEIS is based on documented goshawk habitat use on the Forest, and as a result is considered the most accurate information available.
- “Objectives for this species, particularly 70% forest cover and 50% mature forest and are too broadly defined and are inconsistent with the literature and documented use”: Objectives related to the northern goshawk are described on p. 3-197 of the FEIS. These landscapes are only part of a more comprehensive set of objectives that also includes protecting known nests and preferred structural conditions within known territories and providing the structural conditions necessary for foraging and nesting. Also as described on p. 3-193 of the FEIS, the objective of providing 70% forest cover is consistent with that of the Partner In Flight Landbird Conservation Plan for the Allegheny Plateau and forestwide design criteria (LRMP pp. 84 and 85) require retention of the structural conditions that are consistent with documented goshawk use on the ANF. Collectively, these objectives are expected to provide the conditions necessary to maintain the viability of the northern goshawk on the ANF.
- “The Plan inaccurately describes the goshawk as a species that uses oak habitat”: The northern goshawks preference for upland and Allegheny hardwoods over oak is discussed in the FEIS (p. 3-197) and BE (p. 145) and while the goshawk utilizes oak with much less frequency than other forest types on the ANF, some territories do contain a small oak component. Additionally, there has been much less goshawk survey work within the oak forest type and for these reasons, oak is not considered unsuitable habitat.
- “The plan provides no goals for increasing its habitat and ensuring that extensive forest cover, un-roaded habitat, older forests and areas with minimal human disturbance are provided”: Although not species specific, the LRMP contains a number of goals that will provide conditions required by the goshawk including: 1) provide habitat connectivity, interior and remote forest habitat, 2) maintain a diversity of high quality habitats across the landscape and 3) protect specific habitat elements crucial to the long-term sustainability of species with viability concerns (LRMP p. 14). In addition, see response to PI #86, related to the amount of remote and late successional forest provided under each of the Alternatives.
- “Monitoring requirements do not require habitat monitoring”: Proposed monitoring does include habitat monitoring and as described on pp. 37 to 52 of the LRMP, this monitoring will assess the relationship between habitat and populations for the Northern goshawk. Although specific monitoring protocols will be developed at a later date in the monitoring guide. In addition, see response to PI #437.

In summary, while data is always open to interpretation, considering that the analysis presented in the FEIS and BE was based on data from over 70 nest locations and 43 territories that have documented goshawk use on the ANF, and considering many of the habitat assumptions discussed in the FEIS are consistent with other research in

the State (BE pp. 133-148), it is felt that the information presented accurately reflects goshawk habitat and use. Also because the analysis is based largely on forestwide monitoring and research, the effects discussed are based on the most current and applicable information available.

Public Interest #271: The Final EIS should include more detailed analysis of golden-winged warbler viability.

Sample Statement: Songbird research on the ANF has demonstrated that even mature forest-breeding songbirds use early successional habitat after breeding and during migration. The DEIS dedicates one sentence to the golden-winged warbler, the most imperiled early successional songbird in the eastern US. This is clearly not acceptable. Specific management prescriptions to maintain the viability of the GWW should be discussed, or the effects of lack of management for this species should be made clear. (#106)

Response: We agree that many forest-breeding songbirds utilize early successional habitat after fledging and during migration and approximately 59 percent of the ANF landscape will have conditions suitable for these songbirds. Additionally, while the DEIS and FEIS contain little information related to the golden-winged warbler, a detailed analysis of this species was completed as part of the Species Viability Analysis (SVE). Also, in an effort to more accurately display effects to early successional species, the mourning warbler was added as a Management Indicator Species (MIS) in the FEIS (pp. 3-202 and 203). Finally, utilizing this early successional MIS, the FEIS assesses the availability of early successional habitat by Alternative (FEIS pp. 3-244 to 3-246). As described, it is expected that naturally occurring habitat, combined with suitable habitat created through management, will maintain adequate habitat to meet the needs of early successional species with viability concerns such as the golden-winged warbler.

Public Interest #272: The Allegheny National Forest should not harvest timber during the nesting season for migratory birds.

Sample Statement: The Migratory Bird Treaty Act bans the taking and killing of migratory birds, including their eggs and nests. The DEIS does not address the fact that this law would be violated if logging or any other activity that removes trees occurs during the nesting season for migratory birds (approximately April 1 to July 30th). Inevitably, tree removal during this time period would destroy migratory bird nests, any eggs in those nests and any young birds in those nests. Inexplicably the DEIS does not even discuss whether there should be restrictions on certain types of management activities in timber stands during the nesting season and, if not, why not. The PLRMP does contain certain non-mandatory guidelines regarding management activities near “active nests”...but does not do this for all migratory birds and does not appear to do it for the Cerulean warbler. This is problematic both because it is non-mandatory (while the MBTA does not appear to be discretionary) and because the applicability of the guideline depends upon the Forest Service knowing that a tree contains active nests. For species like the Cerulean Warbler, which nests high up in the canopy, such actual knowledge will almost never happen. Then, Table III-12 simply says that only activities like “site prep, cleaning and weeding” may be restricted in timber stands from April 1 to June 30th. This guideline appears to completely ignore the far greater threat that actual logging operations, or activities such as road building, would create. (#327)

Response: Although some potential mortality to nesting birds from timber harvest is expected to occur (FEIS pp. 3-214 and 3-215), the ANF is a partner in the North American Bird Conservation Initiative and is in compliance with Executive Order 13186, pertaining to Federal responsibilities to migratory birds (FEIS p. 3-257). See response to PI #1 for discussion on the role of standards and guidelines in the LRMP.

Reptiles

Public Interest #273: The Allegheny National Forest should prohibit logging that impacts timber rattlesnake populations.

Sample Statement: Logging would of course mean deaths of timber snakes and rattlesnakes. I do not favor that logging at all if it kills those species. (#44)

Sample Statement: Also, I would like to express concern for the Timber Rattlesnake and its need for a large wild area. I have come across several Timber Rattlesnakes in the wild and it has always been an exhilarating experience. To me they are an integral part of Pennsylvania wilderness. (#183)

Response: While this species utilizes timber-covered terrain, it also utilizes open forest edges, openings, meadows, and open shrub lands. Clearcuts and areas of early structural habitats are important for providing small mammals, a major dietary item of rattlesnakes. Removal of overstory vegetation near potential and known den sites (during the winter months) would improve den site conditions by preventing shade over and increasing basking opportunities.

There are several effects to the timber rattlesnake associated with timber harvest measured by the level of harvest proposed. The effects are: loss of habitat, habitat fragmentation, isolation of populations and direct mortality caused by humans and vehicles.

It is unlikely that timber harvest would fragment rattlesnake habitat to the point that populations would become isolated under any Alternative. MA 2.2 would provide connected late-structural forest habitat with optimum foraging conditions. Direct mortality would be reduced by design criteria to protect den sites and by restricting road and motorized trail construction in 88 percent of the highest quality remote habitat on the ANF (FEIS p. 228).

Potential effects to the viability of timber rattlesnakes are described in the Species Viability Evaluation (Appendix E of the FEIS), and in the Environmental effects section (FEIS pp. 3-241 to 3-246). Guidelines are provided to protect rattlesnakes (see LRMP Timber Rattlesnake Guidelines, p. 87).

Public Interest #274: The Allegheny National Forest should prohibit taking timber rattlesnakes in MA 8.5 and adjust management if populations decline.

Sample Statement: Timber rattlesnake take not be allowed in Management Area 8.5. If populations continue to decline in the ANF as they have statewide, we recommend reevaluation of management plan elements affecting timber rattlesnakes in the future. (#63)

Response: We will continue to work closely with PA Fish and Boat Commission to assess the status of timber rattlesnake populations on the ANF (LRMP p. 40). The LRMP includes monitoring provisions for rattlesnakes on p. 40. If declines occur that threaten viability, more stringent controls on the taking of rattlesnakes may be enforced.

Plants

Public Interest #275: The Allegheny National Forest should protect and enhance the American yew.

Sample Statement: Most definitely we need to protect and enhance the native American yew on the forest. (#278)

Response: This comment is noted and forestwide design criteria exist (LRMP pp. 65 and 80) under all Alternatives that will protect unique native plant species such as the American yew also known as Canada yew

(*Taxus canadensis*). This species was analyzed during the SVE process and has been listed as a Regional Forester's Sensitive Species (RFSS) species for the ANF (LRMP pp. 89 and BE p. 261).

Threatened and Endangered Species

Public Interest #276: The Allegheny National Forest should emphasize maintaining or improving habitat conditions for threatened and endangered species.

Sample Statement: None of the alternatives developed by the Forest Service improve or even maintain current conditions for threatened and endangered species with viability concerns. Under all alternatives, projected welfare of these species declines...See "Species viability outcomes in 2060" in DEIS table 2-3, page 2-31. (#329)

Response: The ANF has completed a Biological Assessment for Federally listed species and consulted with the U. S. Fish and Wildlife Service as required by the Endangered Species Act. Federally listed species and their habitat are conserved under Alternative Cm. Federally listed species are not likely to be adversely affected by Forest Service actions under Alternative Cm. The Biological Assessment was not available when the PLRMP was released because consultation with USFWS was still in progress.

Species with Viability Concerns are addressed in Appendix E of the FEIS.

Public Interest #277: The Allegheny National Forest should take measures as described under Section 7(a)(1) of the Endangered Species Act to further the conservation and recovery of threatened and endangered species.

Sample Statement: Under Section 7(a)(1) of the Endangered Species Act, government agencies shall utilize their programs to further the conservation and recovery of threatened and endangered species. Efforts to accomplish this goal were not included in the LRMP. We recommend that the Forest Service find the best conservation and recovery measures for listed species on the ANF and evaluate how they can integrate these goals into the LRMP. (#159)

Response: Appendix C of the Biological Assessment addressed the requirements of Section 7(a)(1) of the Endangered Species Act. This appendix lists many of the proactive actions that the ANF will undertake to further the recovery of these federally listed species.

3.10.3 Reintroduction of Species

Public Interest #278: The Forest Service should reintroduce wolves into the Allegheny National Forest.

Sample Statement: I'd like to see wolves reintroduced. Wolves are a vital part of the natural system. It's so out of kilter now because we think only about ourselves, selfishly, and not about the animals. (#379)

Response: Reintroductions are specifically addressed under the following guideline:

"Re-introduction of native animal and plant species should occur only after the suitability of the habitat has been assessed and coordination with the appropriate Commonwealth of Pennsylvania agencies has occurred. For most re-introduction efforts, the appropriate Commonwealth agency will be the lead agency." (LRMP p. 80)

3.10.4 Effects of Climate Change

Public Interest #279: The Final EIS should consider climate change impacts on pollinator species.

Sample Statement: The Draft Plan fails to address world temperature change and its impact on pollinators' feeding and breeding grounds on the ANF to ensure the survival of these species of birds, bees and butterflies and the ecological cycle on which we all depend. These species pollinate flowering plants including trees. (#295)

Response: A discussion of climate change can be found in Chapter 3 of the FEIS – Forest Vegetation Section. The Final EIS does not speak specifically to global warming impacts on pollinator species for the ANF.

Studies have documented changes in plant flowering in response to global warming in combination with other studies have shown that plants and animals may respond to different climatic cues and thus their synchrony may be disrupted and this asynchrony between plants and pollinators may be one of the indirect effects of global climate change. However, often little is known about the interactions between flowering plants and their pollinators. Even when pollinators are known for specific plant species, information is lacking about the pollinator's habitat requirements, behaviors and life history requirements (Wall et al. 2003). Impacts to pollinators from global warming are largely unknown.

The importance of 'natural areas' and 'wildlands' as refuges for pollinators from surrounding urban and agriculture dominated landscapes by providing forage and nest sites as well as the importance of pollinators to the 'natural areas' and 'wildlands' is recognized and promoted with the Forest Service's Celebrating Wildflowers program. The ANF's botany program implements the Celebrating Wildflower program through many activities, in particular, the control of non-native invasive plant species, rare plant monitoring and native plant propagation activities.

3.11 Lands and Special Designations

3.11.1 General

Public Interest #280: The Forest Plan should retain all special area designations currently in the 1986 Forest Plan.

Sample Statement: [We] strongly support the decision to retain all special designations from the 1986 Forest Plan. These designations are important elements of assuring the public that these areas will be managed appropriately for their intended uses. (#329)

Response: The ANF has retained all special designations from the 1986 Forest Plan including Wild and Scenic River, National Recreation Area, Scenic Area, Wilderness, Research Natural Area, and Kane Experimental Forest.

Public Interest #281: The Final EIS should detail how management area boundaries were determined for each Alternative.

Sample Statement: There is no information presented on how the management prescriptions were mapped under each alternative, nor on the exact methodology, rules and sideboards of the process that would allow for replication of the process with a common outcome. The process described does not provide enough information to judge whether any two people might come up with the same answers (for example, make the

same determinations). Please explain how the management area boundaries were determined under each alternative. (#443)

Response: Material has been added to describe this. See FEIS, Chapter 2, pp. 2-44 and 2-45.

3.11.2 Land Acquisition and Disposal

Public Interest #282: The Forest Plan should include standards and guidelines for the sale or trade of National Forest System lands.

Sample Statement: I would recommend that Standards and Guidelines be developed to dictate when the ANF might consider selling a parcel of land, whether it is an outright sale of a parcel or a trade of an ANF owned parcel for another privately owned parcel. (#235)

Response: This decision is beyond the scope of the LRMP. Currently, there are only two authorities that allow for the sale of National Forest System land, both of which are very restrictive:

- The Small Tracts Act allows for the sale of small parcels of land.
- The Forest Service Facility Realignment and Enhancement Act of 2005 allows for the sale of administrative sites no longer needed by the Forest Service.

The Exchange of National Forest System land is governed by existing laws and rules and spelled out in Forest Service Manual 5430 and related handbooks.

Public Interest #283: The Allegheny National Forest should place a moratorium on further land purchases.

Sample Statement: I also feel that it is time for the U.S.D.A. Forest Service to reconsider its land acquisition policy for the Allegheny National Forest. Why does the Allegheny National Forest need to expand anymore? It seems that there are enough challenges (and serious problems) facing the Allegheny National Forest already. I would call for a moratorium on further land purchases on the Allegheny National Forest. I think it is also time for U.S.D.A. Forest Service personnel to adopt a friendly, respectful attitude on inholder-residents within the proclamation boundaries. (#292)

Response: The long term desired condition for ANF lands would be a slightly expanded land base with fewer gaps of non-National Forest ownership. To address conflicts with local government over land policies, the LRMP has added a goal (LRMP p. 15) for collaboration with county and local governments to ensure that land adjustments benefit both Federal and local interests. As a practical matter the ANF has had a very small land acquisition program and has obtained lands only from willing sellers.

3.11.3 Wilderness

Roadless Area Inventory

Public Interest #284: The Allegheny National Forest should reconsider the 2,500 acre core area concept used to determine the roadless area inventory.

Sample Statement: We would like to address in general our concerns and issues with the roadless inventory process as detailed in Appendix C of the DEIS. We specifically take issue with “core area” concept. The “R9 Guidelines for Completing Roadless Area Inventories During Forest Plan Revision” (August 1997) attempts

to quantify the idea of “solitude”. In doing so it applies a 2,500 acre “core area” concept that results in an...arbitrary interpretation of the wilderness statutes and the criteria for roadless areas found in the Forest Service Handbook. (#327)

Response: Appendix C has been changed to help further clarify how core area and criteria 7.11.b criteria were applied. Core solitude came into play with only one of the eight criteria for areas in the East (7.11.b.3). In Step 3, core area calculations were made as part of an evaluation of all 7.11.b criteria. A core area which provides “outstanding opportunities for solitude or a primitive and unconfined type of recreation” is an important consideration as identified per R9 Guidelines for Completing Roadless Area Inventories During Forest Plan Revision (August 1997). The idea is to screen out oddly shaped, narrow or gerrymandered configurations that may meet the minimum acreage requirement, but could never be managed to provide the degree of solitude characteristic of wilderness. The Recreation Opportunity Spectrum (ROS) is a combination of activities, settings, and probable experience opportunities arranged along a continuum of six classes (primitive, semi-primitive non-motorized, semi-primitive motorized, roaded natural, rural, and urban). These classes help planners identify areas of a National Forest where a certain experience has the greatest opportunity to occur (USDA 1982). ROS is important in properly applying the semi-primitive core area concept for “outstanding opportunities for solitude or a primitive and unconfined type of recreation” (stated in the Wilderness Act). Core area size can be found in Tables C-9 to C-12 of Appendix C. In Table C-13 (p. C-29), areas were provided supplemental analysis which was based on multiple factors or criteria and further identifies why they were being eliminated. No areas were eliminated based on core area alone.

Public Interest #285: The Allegheny National Forest should reconsider the elimination of roadless areas from the inventory due to the presence of roads, utility corridors and other improvements.

Sample Statement: In certain areas...roads that are not classified as Maintenance Level 3-5 roads have been counted as “improved”, by changing, when convenient, the definition of improved roads from “created on the land for the purpose of travel by passenger vehicles (four-wheeled, 2-wheel drive)” to “drivable by four-wheeled, 2 wheel drive vehicle and are maintained to legally allow public use by any type of vehicle.” This has led to the arbitrary exclusion of areas from the roadless inventory for having too high a road density. The 7.11b criteria require consideration that “improvements” be “disappearing or muted” which suggests a case-by-case determination of the improvements in question and their relationship to the overall area and the perpetuation of wilderness values. However, the R9 guidelines again go beyond FSH criteria in creating a blanket rule that does not permit certain improvements at all...We are especially concerned with exclusion of areas from the roadless inventory simply because of the mere presence of a utility corridor...A high density of utility corridors, or a specific utility corridor because of its size, may not be appropriate, but we believe that in many cases areas have been excluded because of utility corridors that do not, overall, detract from wilderness values. (#327)

Response: New information has been added to Step 2 of Appendix C to help clarify how improvements were considered (pp. C-12-C-14). In Step 2, analysis areas were analyzed to determine whether or not there were existing improvements and/or activities that are not allowed in inventoried roadless areas as per the criterion for including improvements (7.11.a) and inventorying roadless areas in the east, FSH 1909.12 7.11.b.1, 7.11.b.2, 7.11.b.4 and 7.11.b.5. Guideline L of the R9 Guidelines for Completing Roadless Area Inventories During Forest Plan Revision - August, 1997 (p. 8) was also used to help identify improvements that are not allowed in Inventoried Roadless Areas.

Public Interest #286: The Allegheny National Forest should reconsider the 7.11 (b) criteria used in Step 1 of the Roadless Area Inventory:

Sample Statement: We are concerned about the application of Criteria 2. Why are these 7.11 criteria being used rather than 7.11b criteria for eastern forests? We believe these areas meet 7.11b criteria for the roadless inventory and should not have been eliminated. (#327)

Response: The roadless area inventory follows direction found in FSH 1909.12. As stated in Appendix C of the FEIS, sections 7.11, 7.11a and 7.11b of FSH 1909.12 and WO Amendment 1909.12-92-1, effective 8/3/92, all apply to Forests in the Eastern Region. The R9 Guidelines for Completing Roadless Area Inventories during Forest Plan Revision (August 1997) provides further clarification of FSH 1909.12 for application to the Eastern Region. The entire forest was evaluated against all criteria found in FSH 1909.12. However, special attention was given to 7.11b criteria. Appendix C has been changed between draft and final to help clarify when and how criteria were applied.

Public Interest #287: The Allegheny National Forest should consider reconfiguring areas to facilitate re-evaluation and addition to the Roadless Area Inventory.

Sample Statement: We are concerned that no attempt was made to reconfigure certain areas to remove the sections that did not meet roadless inventory criteria and then to re-evaluate the area. (#327)

Response: If an area contained improvements that are not allowed, the area was then examined to determine if it could be reconfigured to exclude those improvements. By examining the location and spatial distribution of the improvements, viable analysis areas could still exist, especially within the larger analysis areas. Boundary considerations were based on the R9 guidelines to “follow natural or relatively permanent human-made features”. Utility corridors, improved roads, private inholdings and natural features were used to reconfigure new analysis area boundaries where feasible. Natural features such as ridgelines, streams or other prominent features were used to draw new boundaries where appropriate and available. The reconfigured areas excluded “significant current mineral activity”, highly developed recreation sites, railroads, utility corridors, some private lands and high standard trails. Not all areas could be reconfigured due to the size, location, topography or amount of improvements in the area. Extensive flat topography was not conducive for establishing new boundaries around improvements. New acreages were calculated for each reconfigured area. If the areas could not be reconfigured and they contained disqualifying improvements, they were eliminated (see Appendix C of the FEIS, pp. C-14 to C-20). In addition, see response to PI #285.

Public Interest #288: The Allegheny National Forest should not eliminate lands from wilderness consideration based upon mineral ownership status.

Sample Statement: We are advocating that the nine proposed wilderness areas in this comment letter be recommended by the Forest Service for Wilderness Study regardless of mineral ownership status. However, we are also advocating the acquisition of mineral rights underlying all nine areas be made a priority of the Forest Service. (#92)

Response: The ANF did not eliminate lands from wilderness consideration based upon mineral ownership status. We agree, there is no requirement that subsurface rights be purchased prior to recommendation as wilderness study areas. However, the roadless area inventory requires an assessment of improvements in the area as found in criteria 7.11.b.2 (Appendix C) which states that “improvements in the area are being affected by the forces of humans, rather than the forces of nature. The ANF looked at the extent and presence of current mineral activity to determine if areas were being affected by the forces of humans. Consequently, the ANF felt that areas of oil and gas development were areas “trammled by man” and where man himself is more than a visitor.

The roadless area inventory and evaluation includes further discussion of mineral activity and how it was applied to the inventory and evaluation process. Significant mineral activity was considered an improvement that was neither disappearing nor muted. To analyze for “significant current mineral activity”, we considered a combination of active wells plus roads that access the active wells. An active well alone or a road used to access abandoned or plugged wells was not considered “significant current mineral activity” (Appendix C of the FEIS, step 2). This follows R9 guidelines for 7.11a (4) which states “Do not include areas of significant current mineral activity, including prospecting with mechanical earth-moving equipment”. The inventory may include areas where the only evidence of prospecting is holes that have been drilled without access roads to the site.

Regardless of not owning the subsurface rights (ownership status), the ANF has recommended two areas (Chestnut Ridge and Minister Valley) as WSA in the ROD. See PI #94 for discussion on the acquisition of mineral rights.

Public Interest #289: The Allegheny National Forest should reconsider the 7.11 (b) criteria used in Step 1 of the Roadless Area Inventory.

FOR ANALYSIS AREA 1-8

Sample Statement: Area 1-8: This is the proposed Hickory Creek Addition...We disagree with the R9 guidelines that the mere presence of a utility corridor automatically prohibits expansion of the Wilderness area. (#327)

Response: Area 1-8. The utility corridor that separates the Hickory Creek Wilderness and 1-8 is a prominent corridor that has been altered by human influence. It is neither muted nor disappearing. The corridor separates the two areas into discontinuous units. As a stand alone area, 1-8 was carefully evaluated for roadless consideration. Multiple factors led to the elimination of Area 1-8 as identified in Appendix C of the FEIS. The Appendix contains new information and changes in regard to Area 1-8 (see pp. C-12, C-20, C-22, C-28 and C-29).

FOR ANALYSIS AREA 3-8

Sample Statement: Area 3-8: The majority of this area remains in its natural, unroaded condition and meets 7.11b criteria. There is no justification for its exclusion from the roadless inventory simply because it is “only” 1,960 acres. (#327)

Response: Area 3-8. Multiple factors led to the elimination of Area 3-8 as identified in Appendix C. New information/changes have been made to this section to help clarify how criteria were applied.

FOR ANALYSIS AREA 3-13

Sample Statement: Area 3-13: The proposed Allegany Recreation Area provides an important bridge to Allegany State Park and features the North Country National Scenic Hiking Trail. This area's size is arbitrarily reduced in the GIS mapping phase giving the impression that it is smaller, and fragmented by private lands when this is in fact not the case...We do not see how...this area...cannot...meet 7.11b criteria. (#327)

Response: Area 3-13. This area is bound by State Highway 280/346 to the south and the ANF proclamation boundary and Allegany State Park to the north. The size of the 3-13 analysis area is depicted accurately both in Appendix C of the FEIS and on Map 9. Multiple factors led to the elimination of Area 3-13 as identified in Appendix C. New information/changes have been made to this section to help clarify how criteria were applied in this step.

Public Interest #290: The Allegheny National Forest should reconsider the criteria used in Step 2 of the Roadless Area Inventory for areas 1-2, 1-3, 1-6, 1-15, 1-17, 1-23, 1-25, 1-27, 1-28, 1-33, 1-35, 2-4, 2-6, 2-11, 2-14, 2-15, 2-24, 2-26, 2-27, 3-2 and 3-5.

Sample Statement: In general, our concerns with areas eliminated in Step 2, are (1) that some were eliminated without being reconfigured, (2) the use of the mere presence of utility corridors to eliminate areas, (3) the inclusion of unimproved roads in calculating road density, and (4) overestimation of the impact of oil and gas development. (#327)

Response: All of these select areas have been added to Appendix C of the FEIS. All areas were examined to see if they could be reconfigured into potentially viable analysis areas for further inventory and documented in step 2. These select areas help represent how all areas were considered for reconfiguration.

Public Interest #291: The Allegheny National Forest should add the acreage below the utility corridor to the Minister Valley area for wilderness designation.

Sample Statement: On page 21 of Appendix C of the DEIS it states that approximately 845 acres were left off southern ends of the proposed area due to a pipeline that crosses east to west. These excisions are not necessary. The entire area can be managed as MA 5.0, with the pipeline recognized as a non-conforming use until such a time as it can be decommissioned or re-routed. Thus, we are advocating that the full 9,990 acres be managed for Wilderness Study, as opposed to the 9,145 acres after the excisions. (#443)

Response: The ANF conducted a field review of the utility corridor in Minister Valley. The corridor is muted but there is a valid easement for use and development of the corridor. Future development of the corridor would not be conducive to wilderness values. Therefore the ANF did not include the area south of the corridor. This area and the area west of Forest Road 420 is designated MA 3.0 in the ROD.

Public Interest #292: The Allegheny National Forest should add the acreage below the utility corridor to the Tracy Ridge area for wilderness designation.

Sample Statement: Approximately 500 acres of the proposed area lie south of a pipeline corridor at the southern end of the area. We are advocating that the pipeline and this acreage be included in the Wilderness Study Area and managed as MA 5.0 land. (#92)

Response: The utility corridor in question is well defined and well maintained. We feel that the activity associated with use and maintenance of the corridor, including clearing and brushing with mechanized equipment would not be conducive to wilderness values. In the ROD, Tracy Ridge has been selected as National Recreation Area in which the land below the corridor is included as MA 8.2.

Public Interest #293: The Allegheny National Forest should add the acreage below the utility corridor to the Chestnut Ridge area for wilderness designation.

Sample Statement: We are advocating that the Chestnut Ridge area be recommended for Wilderness Study. This area is currently under MA 6.1 status...However, the recommended Wilderness Study Area should encompass the entire proposed 5,191 acre area, including the small portion of acreage south of the east-west pipeline at the southern end of the area. (#92)

Response: The utility corridor in question is well defined and well maintained. We feel that the activity associated with use and maintenance of the corridor, including clearing and brushing with mechanized equipment would not be conducive to wilderness values. The ANF followed R9 Guidelines when evaluating utility corridors as described in Appendix C.

Public Interest #294: The Allegheny National Forest should reconsider the roads identified as improved in Step 2 of the Roadless Area Inventory for areas 1-7, 1-19 and 1-21.

Sample Statement: Area 1-7: There is a major discrepancy here between the map before configuration (Map 18) and the road identified as improved after configuration. Map 18 accurately identifies the improved roads in this area, and does not identify Forest Roads 249, 550, and 550A as improved roads because they are not improved roads. But after the reconfiguration (a reconfiguration clearly done to emphasize the area free of improved roads), Forest Roads 249, 550, and 550A are suddenly changed to improved road status. (#327)

Sample Statement: Area 1-19:...the roads identified as “improved roads” appear to change between Step 2 and the reconfiguration of this area. Forest Roads 263, 263A, 263Aa, 500, 500A, 501, and 140 are not

“improved roads” under the definition and this fact is recognized on Map 29. This area also suffers from the arbitrary exclusion of any utility lines, even though “muted” utility corridors are permitted by 7.11b criteria. (#327)

Sample Statement: Area 1-21:...Forest Road 212 (which has been closed to vehicular traffic for 20 years) is given improved road status only after the area was reconfigured. The reconfiguration itself wouldn't have made sense except that Forest Road 212 was not identified as an improved road in Map 31 because it, in fact, is not an improved road. (#327)

Response: The roads in these areas (1-7, 1-19 and 1-21) were carefully considered on a case-by-case – road-by-road basis, in consultation with the Forest Road Engineer to determine if they met the definition of an improved road. Each road selected has been identified in Step 2 of Appendix C (p. C-21).

Public Interest #295: The Allegheny National Forest should reconsider the criteria used in Step 3 of the Roadless Area Inventory for areas 1-9 (Morrison), 1-20 (Allegheny Front), 1-24 (Clarion River), 1-31 (South Cornplanter), 2-17 (Cornplanter), 3-1 (Hearts Content) and 3-18 (Verbeck Island) for inclusion in the Roadless Area Inventory.

Sample Statement: We believe these areas meet the 7.11b criteria for inclusion in the roadless inventory: Area 1-9 (Morrison)...Area 1-20 (Allegheny Front)...Area 1-24 (Clarion)...Area 1-31 (South Cornplanter)...Area 2-17 (Cornplanter)...Area 3-1 (Hearts Content)...Area 3-18 (Verbeck Island). (#327)

Response: We took a hard look at each of the areas listed above as to their eligibility for the roadless area inventory. The results of the inventory process are found in Appendix C of the FEIS. New information/changes have been made to Appendix C intended to help clarify how these areas were considered. The Forest followed FSH 1909.12, Chapter 7 and the August 1997 R-9 Regional Forester letter to evaluate potential Roadless Areas. The inventory evaluation matrix in Step 3 of Appendix C denotes how each area considered either qualified for the inventory or not, based on size (Section 7.11) and the 8 criteria found in Section 7.11b. Table C-13 (Appendix C of the FEIS, p. C-29) also provides supplemental reasons for eliminating areas. The Allegheny Front area was eliminated from the roadless inventory, however upon Forest Supervisor review, it was evaluated for wilderness potential as detailed in Appendix C. New information for the Morrison area has been added to reflect oil and gas development that has occurred in the vicinity of the Morrison Trail and Rimrock. Intensive oil and gas development is also occurring in adjacent areas.

Management of Roadless Areas

Public Interest #296: The Allegheny National Forest should not be managed to preserve roadless areas.

Sample Statement: While [we] believe that there should be roadless areas in some national forests, it makes little sense on the ANF. The areas are so small they are inconsequential. Roadless areas will serve little purpose on the ANF. (#106)

Response: The opinion is noted. There are procedural requirements of forest planning that require the inventory and evaluation of lands for wilderness (e.g. roadless areas). At present, the Roadless Area Conservation Rule (36 CFR Part 294) and other interim directives that limit activities in roadless areas are in effect. These rules affect all National Forests including the ANF.

Public Interest #297: The Final EIS should include the designation of a management area that encompasses all roadless areas.

Sample Statement: Protect all Inventoried Roadless Areas...from commercial exploitation by creating a management zone for these areas that preserves their unroaded character. (#295)

Response: Management areas that protect inventoried roadless areas have been included in the LRMP. They include MAs 5.1, 5.2, 7.2, 8.2 and 8.3. MA 8.1 also provides for roadless areas on islands.

Wilderness Study Areas and Wilderness

Public Interest #298: The Allegheny National Forest should utilize a wildland complex philosophy for making wilderness area recommendations.

Sample Statement: The plan looks at the roadless areas individually, without considering the big picture, and without looking far enough ahead. The highest priority for the ANF should be to protect wildland complexes, in which two or more roadless areas are combined for protection in a long-term perspective. While two units may now be separated by a power line, that line may be removed in the future and the areas joined. Where a low-standard road separates two units, it should be remembered that birds and mammals easily cross that road and utilize the whole area. Three wildland complexes of the ANF deserve this consideration: 1. Wilderness recommendation for Allegheny Front, Hickory Creek Addition, and Minister Valley, supplemented by the existing Hickory Creek Wilderness and Hearts Content Natural Area. This complex is a large block running from the Allegheny River up onto the plateau. 2. Wilderness recommendation for Tracy Ridge, Chestnut Ridge and Cornplanter, which is situated directly across the lake from Tracy Ridge. 3. Wilderness recommendation for Tionesta Scenic Area and Research Natural Area plus adjoining roadless lands. The plan should anticipate the end of the existing oil and gas activities in parts of this complex and provide protection that will assure restoration and protection of the outstanding old-growth forest in the long run. (#269)

Response: The Forest followed FSH 1909.12 and the R9 Regional Forester's August 1997 letter to establish the Roadless Area Inventory and complete wilderness evaluations. The criteria used and rationale is in Appendix C of the FEIS. Parts of each of the three "wildland complexes" mentioned in this comment were identified as special Management Areas in the ROD (pp. 17-20) and are assigned to MAs that include 5.1, 5.2, 7.2, 8.2, 8.3 and 8.5. All of the management areas prohibit scheduled timber harvest and new road construction. In addition, MA 2.2 recognizes these areas as important for wildlife and provides connectivity to these areas through management that provides late structural habitat.

Public Interest #299: The Allegheny National Forest should consider the matrix of even-aged forest when making wilderness recommendations.

Sample Statement: A Forest Management Plan Alternative aimed at satisfying environmental groups and timber interests, by supplying additional wilderness designation within a matrix of even-aged stands managed for early/mid-successional species does not mean an overall balance is achieved on the Forest. We would argue that such a management directive is detrimental to the forest as a whole. Wilderness areas, while an important component of the forest, quickly become those previously mentioned islands, surrounded by a sea of forest managed quite unlike the natural place it encompasses. (#331)

Response: The ANF LRMP based on Alternative Cm uses existing wilderness (MA 5.1), wilderness study areas (MA 5.2), national recreation areas (MA 8.2) and remote recreation areas (MA 7.2) to provide a set of core areas with very little human generated disturbance. Connecting these areas is Management Area 2.2 that also provides for older forest habitat while also conserving remote areas within this Management Area. With this approach, the LRMP strives to maintain a substantial portion of the forest as source habitat for species that need older forest or require limited human disturbance. In other Management Areas (primarily MA 3.0) there will be substantial legacy elements such as reserve trees, snags, down trees, and areas of deferred harvest around riparian areas and other features. In addition, see response to PI #235.

Public Interest #300: The Allegheny National Forest should maximize wilderness recommendations to provide future old-growth forests and core habitat areas.

Sample Statement: The scarcity of existing old-growth in the eastern United States, coupled with the knowledge that designating wilderness will in time have the inevitable effect of producing large stands of late successional and old-growth forests, should considerably inform the decision-making process with regard to maximizing ANF wilderness protections during Forest Plan revision. We should be planning to permanently protect select parcels of the ANF's 100-year-old trees today so that there will be significant representations of 500-year-old trees 400 years from now. (#443)

Response: The ANF recognizes the importance of old growth forests and provides an emphasis on late structural or multi-aged forest (forest in its mature and/or old growth stages) in MAs 2.1, 2.2, 5.1, 5.2, 6.1, 7.2, 8.1, 8.2, 8.3 and 8.5. Consequently, the ROD emphasizes late structural forest on over 204,000 acres. While wilderness does provide for old growth forests to evolve, it is not the only designation used to emphasize late structural or old growth forest. With forest health threats to the ANF, other designations that retain management flexibility may better contribute to the desired conditions of older forest.

Public Interest #301: The Final EIS, Appendix C, should reconsider the “sights and sounds” statement being applied to Minister Valley.

Sample Statement: We...strongly disagree with the statement on page 63 of Appendix C of the DEIS that “noise and visual disturbance along SR 2001 and 2002 as well as near the adjacent private lands and along the adjacent snowmobile trail would adversely affect wilderness character within the sight and sound distances of these edges.” [of Minister Valley Proposed Wilderness] This is a subjective statement, and here again the “sights and sounds” argument is being applied even though it is not relevant to whether or not an area qualifies for wilderness designation. (#443)

Response: Minister Valley met the roadless inventory criteria and was evaluated for its potential as a wilderness study area. On p. C-66 of Appendix C of the FEIS, the evaluation of Minister Valley includes recognition that “noise and visual disturbance along SR 2001 and 2002, as well as near the adjacent private lands and along the adjacent snowmobile trail would adversely affect wilderness character within the sights and sound distances of these edges”. This statement is provided in order to describe the impacts of adjacent activities, which include sight and sound disturbance. The evaluation of wilderness areas follows direction found in FSH 1909.12, Chapter 7 which includes an assessment of the potential addition of roadless areas to the National Wilderness Preservation System to determine the mix of land and resource uses that best meet public needs. An area recommended as suitable for wilderness must meet the tests of capability, availability, and need. In addition to the inherent wilderness quality it possesses, an area must provide opportunities and experiences that are dependent upon or enhanced by a wilderness environment. The FS addressed capability, availability and need for Minister Valley in Appendix C. The FS also stated on p. C-39 of Appendix C that “the evaluations are based on a somewhat subjective system . . .” as “there is no purely scientific way of rating something as subjective as wilderness attribute and value.”

Public Interest #302: The Allegheny National Forest should increase the percentage of acres of designated wilderness areas on the ANF.

Sample Statement: The Allegheny National Forest contains only 9,031 acres of designated wilderness, or only 1.8% of the Forest...The public overwhelmingly supports wilderness preservation (DEIS at C-80) and Congress has acknowledged the urgent need for wilderness, specifically establishing more permissive criteria for wilderness in the East. Yet, the Forest Service seems to resist this aspect of Forest management. The preferred alternative in the DEIS, Alternative C, proposes only two wilderness study areas that would increase the percentage of the Forest managed as wilderness to only 4.5% of the Forest. The best alternative for wilderness, Alternative D, results in only 5.6% of the Forest managed as wilderness...Compare this to the possible 6.0% of the Forest that may be committed to oil and gas development by 2025 and therefore in a

non-forested condition. Considering the multiple-use mandate of Forest Service management, we find this to be a striking imbalance disfavoring outdoor recreation, watershed protection, and fish and wildlife protection. (#327)

Sample Statement: Wanting to preserve exceptional wilderness in the Allegheny National Forest is more than what can be bought and sold. This is value not measured in board feet, employment, or mile of road. Wilderness is not just a commodity or property of institutions to be degraded and destroyed. Humans need beauty, meaning and solitude of untouched nature and expect our government to honor and value these basic needs as much as any other. The importance of timber production and the need to utilize public land for many uses cannot be overstated. However, saving 54,460 acres in a mammoth 513,000 does not seem too much to ask - to protect these tiny remaining wilderness areas for current and future generations. (#304)

Response: The Forest does not have the authority to designate Wilderness. Only Congress has that authority. The Forest followed the FSH 1909.12 direction and the August 1997 R9 Regional Foresters letter in completing the Roadless Area Inventory and Wilderness Evaluation as described in Appendix C of the FEIS. The primary purpose of the roadless inventory and wilderness evaluation is to determine which areas on the Forest have the best potential for inclusion in the National Wilderness Preservation System. It is a matter of whether or not an area would be capable and available for wilderness designation as discussed in Appendix C. We feel that the decisions made in the ROD (pp. 18 and 19) to recommend Chestnut Ridge and Minister Valley provide an opportunity to increase wilderness on the ANF in the best potential areas.

Public Interest #303: The Allegheny National Forest should consider Upper Clark's Island and Verbeck Island for wilderness recommendation.

Sample Statement: Also, the recently purchased upper Clark's Island would be a great addition to the wilderness islands and it looks like that was not considered at all...I'm not sure if Verbeck Island has any development, but if not, it also seems worthy of wilderness consideration. (#162)

Response: Upper Clark's Island and Verbeck Island were included in Appendix C of the FEIS. However, these areas did not meet roadless inventory criteria. Both islands are included in MA 8.1, Wild and Scenic River, which provides long term protection of these areas. Design Criteria found in the LRMP for MA 8.1 prohibit road construction on islands in Wild and Scenic Rivers. Scheduled timber harvest is also prohibited in this MA.

Public Interest #304: The Allegheny National Forest should designate Tracy Ridge, Chestnut Ridge, Minister Valley, Allegheny Front, Cornplanter, Clarion River, Tionesta, Morrison, and Hickory Creek Addition as Wilderness Study Areas.

Sample Statement: I support the designation of all...wilderness areas that are being proposed by the Friends of Allegheny Wilderness in A Citizens' Wilderness Proposal for Pennsylvania's Allegheny National Forest...The four areas that are most important to me are Hickory Creek, Minister Valley, Morrison Run, and Tionesta. I believe these four places clearly show the diversity in biology and topography of the Allegheny National Forest. They also contain many striking rock formations, especially the large outcroppings to the north of where Tanbark Trail crosses the East Branch of the Hickory Creek, and also the cliff lines on both sides of the lower part of Minister Valley. (#256)

Response: Each area, Tracy Ridge, Chestnut Ridge, Minister Valley, Allegheny Front, Cornplanter, Clarion River, Tionesta, Morrison, and Hickory Creek Addition were carefully considered during the evaluation of roadless areas process found in Appendix C of the FEIS. Cornplanter, Clarion River, Tionesta, Morrison, and Hickory Creek Addition did not meet the criteria for inventoried roadless areas and were not evaluated for potential wilderness recommendation. Areas that were evaluated for their wilderness potential include Allegheny Front, Minister Valley, Tracy Ridge and Chestnut Ridge. In Alternative Cm, Chestnut Ridge and Minister Valley are selected for recommended wilderness study areas, Cornplanter, Tracy Ridge and Allegheny Front as National Recreation Areas (MA 8.2), Clarion River and Hickory Creek as Remote Recreation Areas (MA 7.2), Tionesta as

a Scenic and Research Natural Area (MA 8.3 and MA 8.5) and Morrison as Late Structural Linkages (MA 2.2). MAs 7.2, 8.2, 8.3 and 8.5 do not permit new road construction, while MA 2.2 only permits new road construction under very narrowly defined situations (see LRMP p. 112). All of these MAs strive to develop older forest conditions. See the ROD for the rationale for wilderness designations (pp. 18 and 19).

Public Interest #305: The Forest Plan should not include wilderness study areas or remote recreation areas because sufficient wilderness already exists in the region.

Sample Statement: I believe some modifications to Alternative C, preferred by the Forest Service, are needed to strengthen the management of the forest over the next 20 year planning cycle. There is no need for additional wilderness areas or the creation of “remote recreation areas” on the ANF. The existing wilderness on the ANF is 9,031 acres. Plus there are many areas on the forest that are not officially “wilderness”, but lack of timber management activities, such as the National Recreation Areas and the Tionesta Scenic and Natural Areas. Plenty of acres providing this forest type already exist throughout the region. Just to the north there is the Allegheny State Park, which is 65,000 acres of uncut forest. To the south, Cook Forest State Park is 7,182 acres of uncut forest. The State Forests of Pennsylvania provide 27% of their 2.1 million acres, or 567,000 acres, as Wild and natural Areas, Bioreserves and Old Growth. (#452)

Sample Statement: Wilderness designation must be capped at the current level on the ANF. Public lands in the Commonwealth boast nearly 280,000 acres of wilderness, about 10% of all the public lands. More such land is unnecessary and unwarranted. (#509)

Response: One of the six key decisions made in Forest Planning is a “recommendation to Congress of areas for wilderness classification where 36 CFR 219.17(a) applies”. As part of this requirement, a Roadless Area Inventory and Wilderness Evaluation was completed (see Appendix C of the FEIS). A discussion of the need for wilderness and management considerations of wilderness areas or WSAs is included in Appendix C of the FEIS.

We have received comments that support more wilderness and others who do not want to see additional areas designated. The ROD selects two additional areas for wilderness study recommendation. The ANF does not have the authority to designate Wilderness. Only Congress has that authority. Congress will consider whether or not to introduce legislation proposing additional wilderness designation. Such legislation is actually independent of the Forest Plan Revision process and can occur at any time (Appendix C – Process for Determining Wilderness Recommendations).

Public Interest #306: The Forest Plan should not designate wilderness study areas or remote recreation areas so that forest health issues may be addressed.

Sample Statement: Additional wilderness areas on the ANF will limit management activities such as dealing with forest health issues like insect or disease outbreaks, natural disasters such as the 2003 windstorms or enhancing the chestnut tree recovery efforts of known chestnut populations. Remove Management Area 7.2 and proposed wilderness study areas. (#452)

Response: We are also concerned with how these areas will be managed in terms of forest health, natural disasters and species recovery. See the LRMP (pp. 116-125, 137-141) for the direction on how these areas will be managed. We allow for vegetation management in MA 7.2 to address forest health or catastrophic events such as wind and ice storms. In addition, see response to PI #305.

Public Interest #307: The Allegheny National Forest should limit wilderness recommendations to allow for the restoration of pre-European settlement ecosystems.

Sample Statement: Historical presence of large grazing animals, such as the Woodland Bison and Elk, lend evidence that some areas of the forest were more open than today. Certainly, some of the forest probably resembled a savanna condition similar to those described in prehistoric Indiana and Illinois. Wilderness

designation would prevent management strategies that would allow manipulation of the forests to reproduce examples of that kind of habitat condition. If examples of a Pre-Columbian forest condition are driving decisions, active management will need to be an option, an option eliminated if Wilderness Designation is made. (#438)

Response: A discussion of the need for wilderness and management considerations of wilderness areas and WSAs is included in Appendix C of the FEIS. In addition, see response to PI #205.

Public Interest #308: The Allegheny National Forest should prohibit development of the Allegheny Reservoir shoreline at Cornplanter, Morrison Run, and Tracy Ridge.

Sample Statement: [We are] opposed to development of the Allegheny Reservoir shoreline within areas we have proposed for wilderness designation at Cornplanter, Morrison Run, and Tracy Ridge...We are also opposed to the development of the shoreline within the proposed Cornplanter South NRA. (#443)

Response: No new developments have been proposed or identified for recreation development in these areas in the LRMP, nor are they precluded. Any future projects that may occur in these areas would undergo site specific evaluation with additional opportunity for public involvement. Developments would be consistent with the design criteria of the LRMP.

Public Interest #309: The Allegheny National Forest should prohibit any significant wilderness boundary setback from the shoreline of the Allegheny Reservoir at Cornplanter, Morrison Run, and Tracy Ridge.

Sample Statement: Further, there should be no significant wilderness boundary setback from the shoreline of the Allegheny Reservoir. There is abundant precedent throughout the National Wilderness Protection System for making a wilderness boundary tight with the shoreline of water bodies just outside of the wilderness, including man-made reservoirs...The boundary of the Charles C. Dean Wilderness Area in Indiana's Hoosier National Forest is defined as being the "water's edge" of the Monroe Lake reservoir for more than 15 miles as the water level of the reservoir fluctuates, the boundary placement of the wilderness is fluid and actually follows the waterline. The boundary of the Indian Mounds Wilderness Area in Texas' Sabine National Forest is set at 172' in elevation along the shoreline of the Toledo Bend Reservoir, which is the standard pool level for the reservoir...[We] advocate that the boundaries for prospective ANF wilderness areas at Cornplanter, Morrison Run, and Tracy Ridge be set at 1,365' - the maximum pool level for the Allegheny Reservoir - as outlined in the Citizens' Wilderness Proposal...Wilderness designation on the Allegheny Reservoir will offer boaters the increasingly rare vista of a largely wild backdrop, in sharp contrast to the abundant and ubiquitous opportunities to view developed shorelines of water bodies throughout Pennsylvania and the eastern United States. (#443)

Response: None of these areas have been selected for wilderness consideration in Alternative Cm. See the ROD for the rationale for wilderness designations (pp. 18 and 19).

Public Interest #310: The Allegheny National Forest should exclude Tracy Ridge and Chestnut Ridge from consideration for wilderness study areas in order to reserve the area around the reservoir for future developed recreation opportunities.

Sample Statement: We recommend that for Wilderness Study only up to 12,000 acres in 2 or more areas are designated as study areas. We strongly advocate that these areas are located in neither Tracy Ridge nor Chestnut Ridge. Tracy Ridge already has a National designation as a National Recreation Area (NRA) and needs no other designation. It is protected as a remote area that emphasizes dispersed recreation. It has an excellent system of new hiking trails and borders the shoreline of the Allegheny Reservoir. The Allegheny Reservoir is a capstone for developed recreation on the ANF, and it is close in proximity to Interstate 86 in New York, and the important tourism visitation market of Canada...We see that important opportunities for a

resort, cabins, and possible marina expansion or marina development could occur along this reservoir...We also feel that Chestnut Ridge should not be a study area as it is close to the reservoir. (#100)

Response: Alternative Cm does not include Tracy Ridge as a recommended wilderness study area. However, it does include Chestnut Ridge and Minister Valley. A forestwide objective in the 1920 Land and Resource Management Planning section of the LRMP states, “Complete a management plan for the area surrounding the Allegheny Reservoir including management for that portion of the NRA.” This includes Tracy Ridge.

Public Interest #311: The Allegheny National Forest should buffer wilderness study areas from intensive use areas.

Sample Statement: In the north section that borders New York State, between Willow Bay and Sugar Run Bay, it is proposed to be wilderness area going east to forest road 137. On the other side of forest road 137 are the ATV trails, which are in the process of being expanded. Also I saw ribbons indicating that the parking area for the ATV trails were possibly going to be on the west side of the forest road. There should be a buffer between the two. Make the wilderness area from SR321 to the reservoir. If someone were to hike in the ATV area there would not be a problem (I have both hiked and rode the trails). But if an ATV should cross the road it would be a problem. (#248)

Response: The boundary that separates Tracy Ridge from Chestnut Ridge is State Route 321. The boundary that separates Chestnut Ridge from the Willow Bay IUA is Forest Route 137. The boundary for Chestnut Ridge was established and discussed through the roadless area inventory and wilderness evaluation process found in Appendix C of the EIS. In the evaluation of Chestnut Ridge, the adjacent Marshburg-Stickney IUA and both existing and proposed ATV trail systems were recognized to have an affect on Chestnut Ridge by increasing the sights and sounds of human activity associated with motorized recreational vehicles and equipment. However, we feel that Chestnut Ridge still has high potential to provide wilderness attributes and values appropriate for wilderness designation.

Public Interest #312: The Final EIS should allow suppression of forest fires in wilderness areas to protect adjacent property owners.

Sample Statement: From what I understand...Wilderness Area means...no logging or firewood cutting. This means that all the down limbs and trees are fuel for a forest fire. I do not want the risk of a forest fire next door. (#248)

Response: As stated in Appendix C of the EIS, fire would be allowed to play a more natural role in the ecosystem of wilderness areas except where such activity would be threaten public safety, private property, or adversely affect resources adjacent to the wilderness. Suppression of all wildfires in wilderness is in accord with the direction found in FSM 5130.

Public Interest #313: The Final EIS should modify the wilderness management objective to “Manage designated wilderness areas to meet or exceed the minimum level of stewardship....”

Sample Statement: Page II-3, Section 2320 Wilderness Management. I would encourage the Plan Objective to be changed from “Manage designated wilderness areas to meet the minimum level of stewardship....” to “Manage designated wilderness areas to meet or exceed the minimum level of stewardship....” (#235)

Response: The ANF also wishes to exceed the minimum level of stewardship. The Plan objective has been changed to “...meet or exceed...” (LRMP p. 18)

Public Interest #314: The Final EIS should be revised to indicate that the use of motorized and mechanical transport of supplies and personnel is not allowed in wilderness.

Sample Statement: In Appendix C, page 60, you state that “the use of non-motorized and non-mechanical transport of supplies and personnel would not be allowed” Is this correct? If so how would the trails be maintained or constructed? Did you intend to say, “The use of motorized and mechanical transport of supplies and personnel would not be allowed”? This wording appears in other places as well. (#221)

Response: The relevant passages in Appendix C have been updated in the FEIS. The Wilderness Act in section 4(c) prohibits certain uses to include “no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area”. Trail management activities must be accomplished with non-motorized equipment and non-mechanical transport of supplies and personnel. Primitive travel by foot, horse, canoe, or other non-mechanical means and the use of hand tools is allowed.

3.11.4 Remote Recreation Areas

Public Interest #315: The Allegheny National Forest should prohibit mountain biking trails in the Clarion River, Minister Valley, Hickory Creek Addition and Morrison areas.

Sample Statement: In the preferred Alternative C, MA 7.2 status is recommended for Morrison Run, the Hickory Creek Wilderness addition area, Minister Valley and Clarion River. We object to bicycling being identified as a “Suitable” use (Proposed Land and Resource Management Plan, page IV-32) for these areas specifically. If a mountain biking trail were established in any of these areas, mountain bikers would become accustomed to having access there. Therefore, during subsequent Forest Plan revisions, it would be more difficult to designate these RRAs as wilderness because mountain biking would have to be eliminated to do so, which presumably mountain bikers would resist. Allowing mountain biking trails to be established in Morrison Run, the Hickory Creek Wilderness addition, Minister Valley, or Clarion River would compromise the long-term potential for those areas to be added to the National Wilderness Preservation System. (#92)

Response: The Clarion River and Hickory Creek addition areas are designated as Remote Recreation Area (MA 7.2) in Alternative Cm. The ANF feels that allowing bike use in these areas helps to provide a greater range of recreation opportunities for all Forest visitors. Tracy Ridge, Cornplanter, and Allegheny Front are designated National Recreation Areas in Alternative Cm in which bicycle use is appropriate. Bicycles within these areas would only be allowed on designated trails. None of these areas currently contain designated bike trails. Project specific analysis and additional public involvement would be done prior to development of bike trails in these areas. Morrison is a MA 2.2 area in Alternative Cm in which bicycle use is also suitable. Minister Valley is a MA 5.2 area in Alternative Cm which would not allow bicycle use.

Public Interest #316: The Allegheny National Forest should exclude the Minister Valley area from remote recreation area designation and retain the area as suitable for timber harvest.

Sample Statement: While I am not against some remote recreation areas, I am not in agreement with the large area bounded by SR 2002 on the north and SR 2001 on the east, otherwise known as the Minister Area being included in this MA. That is a substantial acreage of suitable timberlands that are removed from production. (#215)

Response: The ANF has selected the Minister area for wilderness study designation (MA 5.2) in Alternative Cm. While this designation will also remove timber from the suitable base, the ANF feels that a viable timber program will continue given 379,000 acres is considered suitable for scheduled timber production in Alternative Cm.

Public Interest #317: The Allegheny National Forest should increase the acreage of the Morrison Run area for remote recreation area designation.

Sample Statement: If the proposed Morrison Run Wilderness Area is not recommended for Wilderness Study, we do support the proposed RRA offered in Alternatives C and D for this area. However, we advocate that the RRA acreage should extend further east to encompass the entire 6,887 acre proposed area, including the North Country Trail and Hemlock Run Valley. (#92)

Response: The Morrison area has been selected as MA 2.2 in Alternative Cm and includes the larger acreage to the east. Extensive oil and gas development in the area was the primary reason for changing the land allocation.

Public Interest #318: The Forest Plan should prohibit campsites in MA 7.2.

Sample Statement: MA 7.2 - I do not think rustic campsites should be in RRAs. (#216)

Response: Developments consistent with semi-primitive non-motorized ROS class are allowed in MA 7.2. This includes camping areas and campsites.

Public Interest #319: The Allegheny National Forest should not harvest timber in the Clarion River area.

Sample Statement: (We) oppose the MA 6.1 allocation of Alternative A for Clarion River. This is an area of the ANF that clearly should never be timbered again. (#443)

Response: The LRMP identifies Clarion River as Remote Recreation Area (MA 7.2) in which scheduled timber harvest is prohibited. Harvest activities and associated reforestation treatments are only suitable in remote recreation areas for resource purposes such as addressing forest health concerns, responding to natural catastrophes, restoring forest cover or to achieve recreation or wildlife objectives. Any such activities would be determined at a project level, with additional public participation, and would need to meet the overall intent of the Remote Recreation Area.

3.11.5 National Recreation Areas

Public Interest #320: The Allegheny National Forest should recommend additional National Recreation Areas.

Sample Statement: The proposed Tanbark National Recreation Area would combine proposed and existing wilderness as well as two of the above-mentioned proposed National Recreation Areas. Patterned after the vision of the Pennsylvania Sierra Club in the early 1970s, the Tanbark National Recreation Area would consist of the proposed Allegheny Front Wilderness, Hickory Creek Wilderness Area addition, Hearts Content National Recreation Area, the Forest Service's proposed Minister Valley National Recreation Area, as well as the existing Hickory Creek Wilderness Area. This Tanbark National Recreation Area would total more than 27,000 acres, establishing a large permanent wildlands complex for future generations, traversed only by a few paved roads. (#443)

Sample Statement: Propose to Congress for designation as National Recreation Areas the Lamentation Run, Bear Creek and Tionesta National Recreation Areas. (#295)

Response: Congress designates National Recreation Areas. The adequacy of the current NRA designation on the ANF was considered during Plan revision. It was determined that NRA designation is recognition of a nationally significant recreation resource, and that there are currently no additional resources of that significance to consider on the Forest.

The Tanbark area (Hickory Creek Addition and Hearts Content) has been included in Alternative Cm as a Remote Recreation Area (MA 7.2). Minister Valley has been included in Alternative Cm as a Wilderness Study Area. Lamentation Run is included in MA 2.2, Tionesta as primarily 8.3 (Scenic Area) and 8.5 (Research Natural Area). Bear Creek and the extended Tionesta area contain and are surrounded by extensive road and oil and gas development which affects these areas in terms of providing a “showcase” for recreation and scenery. See p. 2-20 of the FEIS (Chapter 2, alternatives eliminated from detailed study) for discussion on National Recreation Area considerations.

Public Interest #321: The Forest Plan should include a management plan for the Allegheny NRA which prohibits recommendation for wilderness designation.

Sample Statement: Without the benefit of having the NRA managed to maximize the beneficial use of the area for all forms of recreation, as Congress intended, the Forest Service proposes through the plan revision to potentially further restrict use of these public lands by managing them as Wilderness. This unacceptable situation must be corrected by revising the Plan to incorporate a full management plan for the Allegheny NRA. Waiting until after adoption of the revised Forest Plan to create a management plan for the NRA and in the mean time converting part of the NRA to a Wilderness Study Area only furthers the illegal status of the Forest Service's management of the NRA. (#333)

Response: The ANF has not selected any areas of the Allegheny NRA for recommendation as wilderness in Alternative Cm. See LRMP, Plan Objectives, 1920 Land and Resource Management Planning, p. 18 for an objective to complete a management plan for the NRA as well as the area surrounding the Allegheny Reservoir. This management plan will be completed in a separate process after Forest Plan Revision and will include the opportunity for public involvement. In addition, see ROD p. 21.

Public Interest #322: The Allegheny National Forest should prohibit developed recreation anywhere within the boundary of the Tracy Ridge area.

Sample Statement: We are strongly opposed to any kind of developed recreation anywhere within the boundary of the proposed Tracy Ridge Wilderness Area. (#443)

Response: Tracy Ridge is a congressionally designated National Recreation Area. It was considered for wilderness study area (MA 5.2) in Alternative D of the FEIS. The selected Alternative, Cm, continues designation of the Tracy Ridge as NRA rather than MA 5.2. As part of the management direction for the NRA, new facilities, such as small dispersed camping areas or Adirondack shelters or huts may be constructed to a SPNM ROS class. The SPNM ROS class allows for up to development level 2 as defined in Appendix C of the LRMP. The ANF feels that providing these types of small dispersed camping opportunities is consistent with the NRA designation.

3.11.6 Wild and Scenic Rivers

Public Interest #323: The Allegheny National Forest should consider additional recommendations for Wild and Scenic River status.

Sample Statement: Designate each of the following streams as a National Wild and Scenic River: North Branch Sugar Run, East Hickory Creek, Crane Run, West Branch Tionesta Creek, and Minister Creek. (#172)

Response: The ANF conducted a Wild and Scenic Rivers eligibility determination for Forest Plan Revision. No rivers or streams were determined eligible for study. The process and results of the determination can be found in Appendix D of the FEIS.

Public Interest #324: The Allegheny National Forest should limit timber salvage, new road construction, and new road rights of way, pipelines, and utility lines in MA 8.1.

Sample Statement: Wild and Scenic River Corridor Management allows for timber salvage, new road construction, and new road rights of way, pipelines, and utility lines. These activities diminish the ecological integrity of riparian corridors and introduce routes for invasive (plant) species introduction - a significant problem especially in riparian areas. (#95)

Response: Management area direction for MA 8.1 was guided by the direction and provisions provided in the Wild and Scenic Rivers Act, the Clean Water Act and the USDA-USDI Interagency Guidelines for Managing Wild and Scenic Rivers (47 Federal Register 39454). As such, protection of the outstandingly remarkable values for the Clarion and Allegheny River will follow national direction for managing Wild and Scenic Rivers (FEIS p. 3-349). Harvest activities and associated reforestation treatments are only suitable in MA 8.1 for resource purposes such as addressing forest health concerns, responding to natural catastrophes, restoring forest cover, or to achieve recreation or wildlife objectives. Any such activities would be determined at a project level, with additional public participation, and would need to protect the outstandingly remarkable values for these Wild and Scenic Rivers. See pp. 142-147 of the LRMP for standards and guidelines specific to MA 8.1.

Public Interest #325: The Allegheny National Forest should allow the county Conservation Districts to act as administrators of the Allegheny Wild and Scenic River Management Plan.

Sample Statement: The administration of the Wild and Scenic Rivers Management Plan by the Forest Service has not been consistent or adequate. Adverse conditions upon local citizens' private property are ignored, while governmental agencies are given leniency in regards to permitted activities on the Allegheny River. Nothing within the proposed Forest Management Plan addresses this issue. The administration of the Allegheny River Wild and Scenic River Management Plan has ignored dangerous conditions on private property, as well as ignored environmental problems on private property. Landowners have been blocked from performing commonly accepted practices to control excessive erosion along the river. Permitting of simple practices has become more costly and time consuming than is reasonable or necessary...I propose that the Forest Service enlist those who know the river best, local Conservation Districts, to be given the opportunity to act as the administrators of the Wild and Scenic Allegheny River Management Plan within their respective Counties. This proposal should be included in one of the Alternatives for the proposed Forest Management Plan. (#438)

Response: It is not within the scope of Forest Plan Revision to transfer management responsibilities for Wild and Scenic Rivers to another entity. In addition, see response to PI #324.

3.11.7 North Country Scenic Trail

Public Interest #326: The Forest Plan should incorporate the principles and standards from the North County Trail Handbook for Trail Design, Construction, and Maintenance.

Sample Statement: We would recommend that the Forest incorporate the principles and standards from the North County Trail Handbook for Trail Design, Construction, and Maintenance when managing the trail. (#221)

Response: A new guideline has been added to the Design Criteria, 2350 Trails Management, North Country National Scenic Trail section of the LRMP (p. 61). This guideline incorporates the “North Country Trail Comprehensive Plan for Management and Use” (USDI National Park Service, 1982 as amended and/or updated) and the “North Country Trail National Scenic Trail – A Handbook for Trail Design, Construction and Maintenance” (USDI National Park Service, 1996 as amended and/or updated) (see Design Criteria, 2350 Trails Management, North Country National Scenic Trail).

Public Interest #327: The Forest Plan should specify sign standards and blazing of the North Country National Scenic Trail through wilderness areas in accordance with national standards.

Sample Statement: [We] recommend that any signage used on the North Country NST in a wilderness area be consistent with the NPS designated signing system and the recommended wilderness signing standards supported by the National Forest Service. In Chapter 3 of the DEIS, page 303, “Trail directional signing and marking will conform to wilderness standards. Existing sign and trail markers will need to be replaced or removed in order to meet wilderness standards. “The following excerpt, from the USFS CD titled “Federal Recreation Symbols” under Section 5.11.1 Wilderness and Primitive Areas of EM-7100-15 Sign and Poster Guidelines for the Forest Service; it clearly states that, when a National Trail Standard exists, than reassurance markers are permitted in wilderness and primitive situations. (#154)

Response: A new standard for signing and posting of the NCNST, consistent with EM-7100-15 which includes direction for marking within wilderness has been added to the LRMP (see Design Criteria, 2350 Trails Management, North Country National Scenic Trail, p. 61).

Public Interest #328: The Allegheny National Forest should allow volunteers to use paint blazing to mark the North Country National Scenic Trail.

Sample Statement: Signing and blazing is the quickest, least expensive way to ensure the look of continuity desired throughout the 4,600 mile length of the North Country NST. Currently the North Country NST is marked in the Forest with nail-up blue diamonds. [We] recommend that the Forest agree to allow...volunteers to use paint blazing to mark the trail. 2x6 inch blue blazes are used throughout the seven states through which the trail crosses. (#154)

Response: The ANF values the contributions of volunteers. Nothing in the LRMP precludes the ANF from working with volunteers to accomplish this task.

Public Interest #329: The Forest Plan should designate a management corridor for the North Country Scenic Trail.

Sample Statement: The trail...warrants the semi-primitive classification and a well articulated comprehensive corridor management plan similar in letter and spirit to the plans for management areas established for the Finger Lakes National Forest for the North Country NST...Currently there are a number of locations where OGM extraction efforts have obliterated the North Country NST when minimal measures to site and conduct the extraction differently would have prevented trail damage. (#154)

MAINTAIN A SCENERY OBJECTIVE OF RETENTION OR PARTIAL RETENTION

Sample Statement: Ideally, the trail would be placed in a Recreation Opportunity Spectrum semi-primitive non-motorized corridor with a Visual Quality Objective (VQO) of retention or partial retention. This corridor should be approximately 1,000 feet wide with wider areas to protect particular viewsheds. (#154)

MAINTAIN A 200 FOOT BUFFER ON TIMBER HARVESTING

Sample Statement: I propose a 200' buffer on silvicultural activities along the National Scenic North Country Trail. Hiking the trail is not compatible with these activities. Only a few acres would be removed from timber harvest by this action, and the benefit to hikers would be significant. (#138)

Response: The ANF added a new goal as well as new standards and guidelines for the NCNST to the LRMP. The standards and guidelines provide a consistent management approach for the NCNST and addresses ROS and scenic integrity (see LRMP, Design Criteria, 2380 Scenery, pp. 62-64 and 2350 Trails, NCNST Guidelines, p.

61). Silviculture activities along the trail are not prohibited by the LRMP. However, mitigation of impacts to scenery will be addressed during project planning to meet or exceed a High SIL.

Public Interest #330: The Allegheny National Forest should not implement the proposed Westline Intensive Use Area due to conflicts with the North Country National Scenic Trail.

Sample Statement: The proposed Westline IUA, estimated at 20,741 acres in the eastern half of the forest, has the potential to affect the North Country NST. This IUA would encompass a section of the North Country NST near its crossing at PA Route 321. Because of the proximity of the IUA to the North Country NST and the quiet recreation that its users enjoy...this particular IUA not be pursued. (#154)

Response: The Westline IUA was implemented as part of the 1986 Forest Plan and has always had the potential to impact the North Country National Scenic Trail. The ROD selected Alternative Cm, which eliminates the Westline IUA entirely thereby minimizing noise associated impacts on hikers.

3.11.8 Research Areas

Tionesta Natural Research Area

Public Interest #331: The Allegheny National Forest should adopt a 1,000 foot buffer for the Tionesta Research Natural Area.

Sample Statement: Tionesta Research Natural Area - The 300 feet limit should be greater. This area is unique and warrants stronger protection. We suggest a minimum of 1000 feet. (#329)

Response: The ANF feels that the standard in the LRMP section 2360 Tionesta Research Natural Area is adequate to protect the ecological value of the Tionesta RNA (LRMP p. 62). The standard states that any proposed activity adjacent to or within 300 feet of the Tionesta Research Natural Area will be evaluated at the project level to ensure that the proposed activity is consistent with the area's unique ecological values.

Kane Experimental Forest

Public Interest #332: The Allegheny National Forest should expand the Kane Experimental Forest to provide more opportunities to research oak regeneration.

Sample Statement: If the Kane Experimental Forest needs additional acres for research, why not consider a portion of the Tracy Ridge Area rather than turn this area into wilderness. The Tracy Ridge area has an oak component on it that, if used for research, could benefit not only the ANF in regenerating oak stands, but also the entire northeast. (#132)

Sample Statement: The new plan should expand the Experimental Forest not only including the proposed acreage in the Draft EIS, but should also include the "Chestnut Ridge" area (5,063 acres) for conducting research to regenerate our oak forests, and hopefully, someday reintroducing disease resistant chestnut back into our local forests. (#452)

Sample Statement: We recommend...that Alternative C be amended to further expand MA 8.6 (Kane Experimental Forest) by including non-contiguous acreage that contains a high concentration of oak. We recommend utilization of (a) a portion of the proposed wilderness study area, MA 2.2 or MA 7.2 (Remote Recreation Area) acreage located east of the Allegheny Reservoir or (b) a portion of the MA 7.2 along the Clarion River. These are the areas of oak concentration most readily accessible from the current Kane Experimental Forest. (#268)

Response: We consider the entire ANF available for research regardless of designation as an Experimental Forest. Research, both manipulative and non-manipulative (i.e. monitoring and inventory) is considered a valid and important use of the ANF. Both types of research provide valuable contributions to active forest management. Inventories of the physical and biological resources in wilderness is often needed to provide current baseline information, to serve as a benchmark for environmentally induced change in the future, to support other scientific studies, and for monitoring. Both Chestnut Ridge and Tracy Ridge contain prime examples of natural resources and processes, including significant genetic resources of oak and chestnut that have value for long-term observational studies or as control areas for manipulative research elsewhere. However, oak regeneration studies would not be allowed in wilderness or wilderness study areas (MA 5.1 and MA 5.2 which includes Chestnut Ridge) or the National Recreation Area (MA 8.2 which includes Tracy Ridge). Oak regeneration studies may occur on nearly 40,000 acres of the ANF in Alternative Cm in MAs 1.0, 3.0, 2.2 and 6.1.

Public Interest #333: The Allegheny National Forest should implement the proposed expansion of the Kane Experimental Forest, including expansion of the training facility/classroom building.

Sample Statement: I would support expansion of the training facility/classroom building within the KEF to meet current and anticipated needs. (#215)

Response: The LRMP does not preclude expansion of the training facility in the future.

Public Interest #334: The Allegheny National Forest should allow salvage harvests in MA 8.6.

Sample Statement: For MA 8.6, the 2400 standards should allow salvage harvests. (#216)

Response: The LRMP has been changed to allow salvage harvest in MA 8.6.

Public Interest #335: The Forest Plan should allow firewood gathering and special uses in MA 8.6.

Sample Statement: MA 8.6 - firewood gathering should be allowed. MA 8.6 - Special uses should be allowed (#216)

Response: Firewood gathering and special uses are not permitted in the Kane Experimental Forest due to the high potential for those activities to disturb or damage valuable, short-term and long-term forest research designed to increase our understanding of hardwood forests in the Northeastern U.S. (LRMP Part 4, Management Area 8.6 Design Criteria, p. 167).

Public Interest #336: The Forest Plan should permit the suitability of interpretive trails at the Kane Experimental Forest.

Sample Statement: Change the suitability of “Interpretive Trails,” in Table IV-32 of the Proposed Land and Resource Management Plan from Unsuitable to Suitable. The experimental forest, by its very nature lends itself to “scientific and demonstration/education use” of the forest as described in the Guidelines under code 2700 (page IV-61)This would enhance the value of the work and support the ANF guideline of “public education.” (#201)

Response: The LRMP has been updated to include suitability for interpretive trails in KEF (see the Suitable Uses and Activities section of the LRMP).

3.12 Recreation

3.12.1 General

Public Interest #337: The Forest Plan should emphasize creating additional recreational and tourism opportunities.

Sample Statement: We are in agreement with the public in that the development of recreational and tourism opportunities should be identified as a priority in the proposed Land and Resource Management Plan for the ANF. (#202)

Response: One of the primary issues addressed in the LRMP is recreation and we feel that all the Alternatives provided a range of opportunities that would benefit tourism. Our intent was to provide land management allocations that emphasize all types of recreation including developed recreation, dispersed recreation, trails and motorized and non-motorized uses. We provide an emphasis within each management area for recreation and scenery that allow for development to occur consistent with the Recreation Opportunity Spectrum (ROS). The forestwide goal for 2300 Recreation Management is to provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation places and those important to the tourism industry. Given this goal, we recognize that recreation is important to all users of the Forest including the tourism industry. We are currently working closely with the PA Wilds! initiative to coordinate the ANF's contribution to the recreation and tourism potential of the area.

Public Interest #338: The Forest Plan should emphasize coordination with the Pennsylvania Wilds program.

Sample Statement: The 2006 ANF FPR process fails to acknowledge the Recreation Plan process undertaken by the Commonwealth of Pennsylvania for the twelve-county Pennsylvania Wilds tourism/recreation region...The USFS must be an active participant in the Pennsylvania Wilds recreation/tourism planning process. (#121)

Sample Statement: We support the efforts of local government and economic development agencies, the state and local tourism agencies to provide coordinated tourism...All effort to coordinate with PA Wilds and other promotional efforts should be encouraged. (#97)

Response: The ANF is a full participant in the PA Wilds effort by the Commonwealth's Departments of Community and Economic Development and Conservation and National Resources. See p. 13 of the LRMP for the recreation goal statement that recognizes the importance of this effort and understands that the success of the program is directly affected by ANF participation.

Public Interest #339: The Allegheny National Forest should emphasize increasing motorized recreation opportunities and decrease the number of non-motorized recreation areas.

Sample Statement: Despite the Proposed Plan's Goal of increasing the "quality and quantity of motorized trail riding opportunities", the Goal is not supported by the Proposed Plan Alternative C, which actually reduces both the number of Intensive Use Areas available for ATV/OHV trail development and reduces the total number of acres in those areas. Conversely, the Proposed Plan states that an increase in non-motorized recreation is not expected to occur during the planning period, yet the Preferred Alternative C designates tens of thousand of acres as Remote Recreation and Wilderness Study areas, which are only conducive to non-motorized recreation...The Proposed Plan must be revised to specifically state a Desired Condition, Goals, and Objectives, that support increased motorized recreation on the ANF by making additional acreage available for trail development and changing Standards, Guidelines, and other elements of the Proposed Plan. (#333)

Sample Statement: Less than 2% of the recreational visitors on the ANF spend time on primitive non-motorized activity associated with a wilderness setting, hardly an endorsement to increase the amount. In fact, no management areas need be established that cater to non-motorized recreation regardless of the title. (#509)

Response: The forestwide goal for 2300 Recreation Management is to provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation places and those important to the tourism industry. Given this goal, we recognize that both motorized and non-motorized recreation activities are both valuable and desirable. It is likely that the supply of ANF recreation settings and opportunities would meet future demand during the implementation cycle, or the next 10 to 15 years. This statement includes all recreation opportunities, including both motorized and non-motorized use, based on predictions of a 1.2% (slight to moderate) increase in visitation. The visitation calculation was provided in the FEIS, pp. 3-310 and 3-311, and is based on 2001 NVUM data. Regardless of the future prediction for recreation growth, the Allegheny National Forest has provided a range of opportunities for both motorized and non-motorized recreation in the Alternatives as some people desire an emphasis on non-motorized recreation while others prefer motorized.

The ATV trail development areas, or intensive use areas (IUAs), emphasize ATV activity. 83,202 acres of IUA (16% of the ANF) are offered in Alternative Cm for ATV trail development. Dependent on management goals, approximately 89% of the ANF is open to motorized traffic on identified routes to facilitate recreation, administration, or resource management.

Other areas such as the National Recreation Areas, Wilderness, Wilderness Study Areas, Scenic Areas and Remote Recreation Areas emphasize non-motorized uses such as hiking opportunities. The 1986 Forest Plan provided only 38,707 acres or approximately 8% of the ANF for non-motorized use. Alternative Cm selected in the ROD increases that acreage by approximately 70% to 54,810 or approximately 11% of the ANF for non-motorized use.

See the ROD (p. 21-23) for the rationale on why we chose Alternative Cm to balance the concerns of those who want motorized recreation and those who want non-motorized.

Public Interest #340: The Allegheny National Forest should prioritize non-motorized recreation over motorized recreation.

Sample Statement: The Forest Plan is also severely imbalanced in favor of motorized over non motorized recreation. 97,745 acres are committed to motorized uses such as ATVs, but non-motorized uses ranging from camping to bicycling to horse back riding to hunting are emphasized on only 59,800 acres. There are many places in Pennsylvania where motorized recreationists have access. Hikers and other non-motorized recreationists have fewer choices. (#291)

Sample Statement: Consider eliminating motorized recreation (ATV, snowmobile, motorcycle) in remote and scenic areas. There should be adequate auto/truck access TO these areas, but the areas themselves should be reserved for camping, if appropriate, hiking and appreciation of a quiet forest setting where the only sounds are those of birds, chipmunks and squirrels, gently flowing streams, and the sloughing of wind through the canopy of pines and hemlocks. (#127)

Sample Statement: Importantly, a recent monitoring report revealed that only 1.7% of forest visitors participate in ATV riding. Yet, the Forest Service is determined to make ATV's the premier recreation activity in the Allegheny. This will further displace those seeking a remote recreation experience. (#295)

Response: See response to PI #339.

3.12.2 Non-Motorized Recreation

General

Public Interest #341: The Forest Plan should permit the suitability of large scale non-motorized recreation events in all management areas.

Sample Statement: In recent years a number of competitive events have developed and continue to increase in popularity for which the ANF is an extremely attractive venue. These events include cross country skiing, snowshoeing, dog sledding, mountain biking, road biking, triathlon, and adventure race competitions...Portions of the Proposed Plan that prohibit special use permits for competitive recreation events must be revised to allow for the issuance of special use permits for non-motorized competitive recreation events in all management areas. Otherwise, established events, such as the Kinzua Country Tango held in part in an area to be designated as Remote Recreation, will be jeopardized and the ability to develop new events will be significantly curtailed. (#333)

Response: The ANF carefully considered whether large scale (motorized or non-motorized) competitive events would be compatible with the desired condition for each MA. In MAs 6.3, 5.1, 5.2, 8.2, and 8.5, these types of events were determined to be incompatible with the management emphasis for these areas. The ANF does recognize the importance of these events and allows for these types of activities in the remaining MAs which represent the majority of the ANF.

Environmental Education

Public Interest #342: The Forest Plan should emphasize education.

Sample Statement: Education must be emphasized in the plan. Signage throughout the forest needs to be updated and expanded. Demonstration areas, videos, lectures, and communication needs expanded with the general public, tourists, communities, and industry. (#163)

Response: Opportunities to provide natural resource conservation education are not precluded by the LRMP. Through its work with partners, the Forest Service supports conservation education efforts which reach out beyond National Forest boundaries. Partnerships with other federal, state, and local agencies, conservation organizations, private corporations and others help the Forest Service bring conservation education to a wide variety of people.

Public Interest #343: The Allegheny National Forest should designate interpretive recreation areas.

Sample Statement: Alternative C does not address the need to designate interpretive recreation areas - we support the addition of interpretive recreation areas in the forest. (#202)

Response: The Allegheny National Forest supports interpretive recreation opportunities across the Forest. However, we do not feel an area needs designation as an interpretive area in order to emphasize interpretation, conservation and/or education of natural resources. Management areas that are suitable for interpretive trail development are identified under the Suitable Uses and Activities section of the LRMP.

Hunting and Fishing

Public Interest # 344: The Forest Plan should include recreational fishing and boating among the management goals.

Sample Statement: The discussion of fishing as a current and traditional important recreation activity is conspicuously absent, as are discussion of potential impacts of various management alternatives. The Fish and

Boat Commission has partnered extensively with the Allegheny National Forest in the past to manage recreational fishing. We believe such discussion is a serious omission in the Draft EIS and we offer to provide substantive input on existing and potential recreational use and resource management as potentially affected by future management. (#62).

Response: The ANF recognizes recreational fishing as an activity that is important to the Pennsylvania Fish and Boat Commission and the ANF. The ANF has a Desired Condition for recreational fishing that begins on p. 11 and extends onto p. 12 of the LRMP. While effects to recreational fishing are not specifically addressed, the first goal listed under the 2300 Recreation Management section on p. 13 of the LRMP is intended to capture all the various recreational activities that can, or could, occur on the ANF, including recreational fishing and boating. In addition, the ANF does address the importance of protecting aquatic habitat to insure fishing opportunities exist for anglers through the use of numerous standards and guidelines (design criteria) to protect habitat. Potential effects to recreational fishing opportunities will be addressed on a site-specific basis during any project level decisions that could affect these opportunities.

Public Interest #345: The Forest Plan should consider the importance of hunting, fishing and trapping as wildlife conservation tools and the importance of wildlife to these sports.

Sample Statement: One of the greatest conservation tools available is hunting and trapping. That activity helps to control disease, starvation and population density and thus protects the flora and fauna...More planning and attention needs to be directed to the importance and effect of wildlife upon the outdoor sports of...hunters, trappers and fishermen. (#320)

Sample Statement: Though not specifically discussed, we assume that hunter access and game species will be given appropriate consideration in the revised plan. Conservation organizations supported almost exclusively by hunters have been faithful supporters of the ANF for many years and their use of the Forest is understood to be very high (though we know reliable figures are not available). Many thousands of hunter dollars have been used to fund habitat and other projects that have benefited more non-game than game species and as many non-hunters as hunters. Hunters have been used effectively and with great cooperation to address deer management issues. (#106)

Response: The ANF recognizes the important role that hunters provide. We are appreciative of the past support of hunters. An important goal of the LRMP is to “Provide habitat for game species to make opportunities available for quality hunting and fishing experiences while promoting the management of game species that sustains healthy forest understories.” (LRMP p. 14) The importance of game species and hunting is also discussed in the FEIS on pp. 3-204 to 3-205 and 3-279. Alternative Cm would provide 1600 acres of wildlife enhancements annually, many of which would benefit game species (FEIS Table 2-2, p. 2-47).

Public Interest #346: The Forest Plan should provide for sufficient early successional habitat to maintain hunting.

Sample Statement: The DEIS fails to adequately analyze the short and long-term effects of this management plan on early successional habitat and recreation associated with it. Nearly every game species and dozens of non-game species rely on 1-10 year old forests. According to USFWS HIP data (Kelley 2004), Pennsylvania has more woodcock hunters than any other state in the east...Pa also has 135,000 grouse hunters....Upland game bird hunting is extremely popular...There are nearly 900,000 deer hunters in PA. A balance of habitats is critical for maintaining ecologically and socially acceptable deer populations. (#106)

Response: Alternative Cm increases the amount of early structural habitat from the current level of 7 percent of the ANF to 10 percent by 2060 (FEIS Table 3-50, p. 3-220). While about 34% of the ANF will be managed with an emphasis on late structural forest conditions, more than 65 percent of the ANF will be managed for a diversity of structural conditions (FEIS Tables 3-51 and 3-55, pp. 3-220 and 229).

We agree that hunting is an important recreation activity in Pennsylvania and that early successional habitat is important to game species. Habitat for deer, bears, turkeys, grouse and woodcock are addressed on p. 3-204 of the FEIS. Early structural habitat will increase by 2060 under all Alternatives except Alternative D. This increase will benefit deer, bears, grouse, woodcock, and to a lesser extent turkeys. Permanent wildlife openings will occur on a variety of ecological land types (ELTs) on 2 percent of the ANF. These openings provide brood rearing habitat for wild turkeys, and ruffed grouse, late-fall foraging habitat for turkeys, and early spring foraging for deer. Openings in bottomland ELTs, such as the Beanfields, Hall Farm, and Buzzard Swamp provide food and cover for American woodcock under all Alternatives. Maintaining alder and crab apple thickets and other shrub habitats that provide breeding, nesting, and brood rearing habitat for woodcock will occur as a wildlife enhancement treatment under all Alternatives. Old farm habitats such as the Economite Farm, Scott Farm, and Hall Farm will continue to be managed as grass, shrub, and early structural habitat to benefit both game and non-game species. Approximately 59 percent of the landscape will provide a high level of horizontal diversity preferred by many game species (FEIS pp. 3-248 and 249).

Public Interest #347: The Allegheny National Forest should manage the National Recreation Areas and Remote Recreation Areas for hunting by regenerating oak.

Sample Statement: The RRA & NRAs should allow for the regeneration of oak, particularly along the Clarion River, Allegheny River & Allegheny Reservoir. With the proposed plan allowing more oak to fade out, the loss of hard wood will impact wildlife. More oak will be lost and the forest has already suffered a loss of 18 M acres since 1986. With hunting being a large recreation use along the rivers and reservoir, this type of recreation use should be factored into the management of those areas. Dispersed recreation (p. 3-111) shall not automatically dictate a “no management” policy. If hunting is the primary dispersed recreation use in an area, then managing vegetation to maintain oak is a logical follow through. (#216)

Response: The NRA (MA 8.2) designation and the RRA (MA 7.2) designations including the Clarion River area would not prohibit or restrict hunting within these areas. The Forest provides a wide variety of vegetative conditions for wildlife habitat including objectives to increase and maintain oak (see LRMP Objectives - 2400 Vegetation and 2600 Wildlife, Fish and Sensitive Plant Habitat). Habitat conditions that MAs 8.2 and 7.2 provide for wildlife include conditions for wildlife species that are sensitive to human disturbance and for species that use mature forest or late structural habitat (see desired conditions MA 7.2 and MA 8.2 in the FEIS). There is opportunity to actively manage for oak in MAs 1.0, 2.2, 3.0 and 6.1. In addition, see response to PI #205.

Hiking, Backpacking and Camping

Public Interest #348: The Forest Plan should emphasize hiking and backpacking opportunities.

Sample Statement: Little credence is given to hiking and backpacking even though the public commented extensively on the need to improve these opportunities in the Allegheny. (#93)

Response: LRMP comments regarding hiking and backpacking opportunities were used to identify suitability decisions by MA as listed in LRMP Part 2 which states, “Hiking/Cross country skiing/Backpacking trail development and use is suitable on all areas of the forest except that new trails are not suitable in MA 8.5 Research Natural Area.” In addition, between the DEIS and the FEIS projected recreation trail activities were added to Table 2.2. Up to 5 miles a year of new non-motorized trails are projected in Decade 1 and Decade 2. These could include hiking, biking, or horse trails, but will be managed as multi-use trails.

Public Interest #349: The Allegheny National Forest should evaluate rails-to-trails opportunities within the forest.

Sample Statement: There is no mention of rails-to-trails opportunities in the plan. I would like to think we would be supportive of the Kinzua rails-to-trails path and that if the Knox RR ever came available, we would take a good look at that potential, too. (#162)

Response: The LRMP does not preclude the addition of Rails-to-Trails projects.

Public Interest #350: The Allegheny National Forest should provide more cross country and hiking loop trails.

Sample Statement: The statement that “underutilized” recreation facilities will be evaluated for closure makes me fear that we will be closing down more cross country ski and hiking trails. I think the ANF should provide more of these opportunities, not less. It's obvious from looking at the trailheads at Minister, Morrison, and Hickory Creek that there is a need for more loop trails. The North Country trail could be used to create longer loops for people who don't have an easy way to make shuttles. (#162)

Response: The LRMP does not preclude the addition of cross country and loop trail systems.

Public Interest #351: The Allegheny National Forest should allow bicycles on hiking trails.

Sample Statement: If you make hiking trails inaccessible to bicycles how can disabled like me camp? ...My bike makes transportation of gear a possibility. (#102)

Response: The ANF currently manages several trails for both hiking and bike use. The LRMP in the suitable uses section for recreation states that bicycle trail development and use may be suitable on designated routes (trails/roads) not signed closed to this use, dependent upon management area direction. Additionally, bicycles may be permitted on hiking trails provided the hiking trail is designated for this use and the trail is designed and constructed to withstand bicycle use. One of the forestwide objectives of the LRMP found in the 2350 Trails Management section is to establish trail classes, permitted uses, construction, reconstruction and maintenance priorities for all trails.

Public Interest #352: The Allegheny National Forest should inspect dispersed camping sites and enforce regulations.

Sample Statement: The Forest Service on the ANF needs to control the way the public uses the Forest for dispersed camping...We are concerned with the expanding size of camping areas occurring deeper and deeper off the Forest Roads. More and more trees are being cut for fire wood and other uses. Fire pits are expanding and are filled with half burned garbage in many cases. No inspections are made to check for acceptable sewage facilities in each camp site. Some sites are used by the same people weekend after weekend, even some camping trailers and tents are left standing from one week to the next. Standards must be enforced and sites must be inspected regularly by the Forest Service. (#293)

Response: To address this concern, the LRMP (p. 18) provides a forestwide objective for 2300 Recreation Management to increase the number of inventoried dispersed sites and concentrated use areas managed to standard to reduce health, safety, and resource impacts caused by unmanaged recreation use in the general forest area and provide ancillary support facilities, such as parking areas and toilets, as needed, to protect resources and the environment.

Public Interest #353: The Allegheny National Forest should address dispersed camping along the river near Belltown.

Sample Statement: Either stop the camping along the river near Belltown, Elk County or put in proper sewage facilities. (#4)

Response: This comment addresses a site-specific action and is not a Forest Plan decision (see LRMP, Decisions of a Forest Plan, pp. 1 and 2). See response to PC #352 for a forestwide objective related to this comment.

Public Interest #354: The Forest Plan should limit the conversion of limited use trails to multiple-use to prevent user conflicts.

Sample Statement: The Forest Service should take great care in converting limited use trails to multiple use. The possibility of user conflict should be carefully evaluated. Trails currently used only for foot travel should not be opened to ATV/OHM or equestrian use. (#329)

Sample Statement: Horse and, to a lesser extent, mountain biking are not compatible with hiking trails (another statement in the plan says that we may develop multiuse non-motorized trails). Hikers often are the ones who maintain these trails through volunteer work. Horses and mountain biking are capable of creating a huge amount of erosion and damage. (#162)

Response: Clearly, some uses are more compatible than others. The ANF recognizes that trail conflicts affect visitor experiences. An objective on p. 18 of the LRMP identifies the need to establish permitted uses and priorities. A guideline on p. 60 assures that multi-use trails are managed for their primary purpose and that all appropriate modes of travel be established at the trailhead.

Equestrian Use

Public Interest #355: The Forest Plan should restrict equestrian use to limits impacts to natural resources.

Sample Statement: Equestrian use within core forest areas and corridors, pronounced in alternative D, is problematic. Compacting of soils, introduction of invasive non-native species and damage to herbaceous layers are concerns, and with wide spread use, could reduce the conservation value to these large, forested areas. Equestrian use should be limited to areas that are under more intensive timber production and dedicated to uses other than those that would improve the ecological value of forests. (#95)

Response: The ROD did not select the EUA configuration from Alternative D. Instead it selected Alternative Cm that uses the same concept of Equestrian Use Areas but selects less land area for them. The EUA concept allows controlled monitoring of the most ridden commercial use areas and mandates riding on trails only (no cross-country riding). Cross-country riding is also prohibited or restricted in MAs 5.1, 5.2, 6.3, 7.2, 8.3, 8.5, and 8.6 (LRMP p. 32). Cross-country riding is allowed in all other MAs, except in designated EUAs. A standard, LRMP p. 61, clearly identifies the need to track horse use outside of EUAs in the open riding areas. Monitoring of these areas could result in the expansion of trails designated for riding only and the elimination of cross-country use through a future LRMP amendment.

Public Interest #356: The Forest Plan should allow open horse riding.

Sample Statement: I am expressing my comments on horseback riding in the Allegheny National Forest...I definitely would like it to be open riding. There are many riders who live to own camps along the Forest that really enjoys leaving from their back doors. Open riding also keeps the trails from being overused in one area. To restrict those people to one designated trail would disappoint them greatly and most likely discourage them from coming back. (#299)

Response: The ROD selected Alternative Cm that allows restricted riding on 55,792 acres, open riding on 442,995 acres, and prohibits riding on 7,689 acres. Less than 2% of the ANF will be prohibited for equestrian use.

3.12.3 Motorized Recreation

General

Public Interest #357: The Allegheny National Forest should establish trail connectors to services and nearby non-federal trails.

TO CONNECT WARREN COUNTY

Sample Statement: The Allegheny National Forest 1986 Forest Plan Revision documentation called for a “loop” to form the backbone of the Allegheny National Forest snowmobile system, to be completed “in the first decade” of the Forest Plan, while connectors to business establishments in communities providing food, fuel, lodging and other needs were to be completed “in the second decade” of the Forest Plan. The later commitment would mean 1996 to 2006. No such work ever materialized in Warren County. In fact, there is no connection to a gasoline filling station on “the Loop” between Whig Hill in Forest County and Blissville in McKean County...Since the Allegheny Trail Committee started having meetings between snowmobiler-volunteers and U.S.D.A. Forest Service personnel in 1988, snowmobiler-volunteers have been complaining about the lack of needed connectors in Warren County. (#292)

TO CONNECT SHEFFIELD

Sample Statement: In January of 1996, then-Forest Supervisor John Palmer sent out a broadcast letter to “friends of snowmobiling on the Allegheny National Forest” to solicit input on how to address priorities for establishing snowmobile connectors in the “second decade” of the 1986 Forest Plan Revision. Several snowmobile clubs and individuals responded with numerous proposals...By the fall of 1997, however, U.S.D.A. Forest Service personnel at the Allegheny Trail Committee meeting held at Chapman State Park were telling snowmobiler-volunteers that budget shortfalls would delay the Sheffield connector...Where are the alternatives for a Sheffield connector that the U.S.D.A. Forest Service has come up with? What about a connector to Clarendon, or another way into Sheffield? To my knowledge, there are none. (#292)

TO CONNECT KANE

Sample Statement: Our club is in full support of developing ATV trail and access into the Kane Borough from the Allegheny National Forest. We feel that an ATV trail leading onto Kane would provide a tremendous boost to our economy. We would like to have a trail coming in from the Lantz Corners area and exiting southward to the timberline trail access. Local property owners are cooperating regarding signing permission forms along bordering property boundary lines with the forest. By having ATV access to the forest would reduce the illegal activities that now exist. The trickle down effect of riders buying gas, food, supplies, and staying overnight instead of driving further south can only be imagined. (#464)

TO CONNECT RIDGWAY

Sample Statement: It has been brought to my attention that residents of Elk County plan to present a petition to the Forest Service Office in Warren, commenting on the Purposed Land and Resource Management Plan (PLRMP) and the Draft Environmental Impact Study (DEIS). They are seeking a connector All-Terrain Vehicle (ATV) trail from Buehlers Corner Trail Head to the Sandy Beach Recreational Park in Ridgeway. The length of the proposed extension of the timberline trail would be approximately six miles and would provide trail riders better access to shops, restaurants and lodging in the Borough of Ridgeway. As you work toward finalizing the Forest Plan Revision, I urge you to give serious and thoughtful consideration to safe recreational opportunities that can promote economic stability to our local communities. (#321)

Response: Connection of the National Forest ATV/OHM Trail system to a specific community could present adverse challenges for future trail management. By nature, the current ATV/OHM trail system self-limits the number of users by design of the trailhead facility. For instance, if the trailhead is full then users are likely to bypass the facility and ride elsewhere. This self-limiting function permits trail users to have the type of experience they desire; primarily a roaded somewhat remote ATV/OHM riding experience with a few friends. Occasional groups and single riders are encountered but there is a reasonable expectation that at several times during the day, even on high use days, the rider could have the trail to him/herself for brief periods.

Having unencumbered access, like that provided with a direct connection to a town with essentially unlimited parking, could easily encourage overuse of the trail system. Overuse is problematic for the user (it becomes too crowded to enjoy) and for the trail (excessive trail impacts). For these two reasons the ANF has decided that direct trail access from communities will not be investigated at this time.

Public Interest #358: The Allegheny National Forest should allow dispersed motorized recreation on the forest.

Sample Statement: My family and friends have recreated on the ANF for 60+ years. Much of those six decades our family rode motorized off highway vehicles on our national forest lands. These activities were condoned and classified as dispersed recreation until the forest plan of 1986 closed the forest to dispersed motorized recreation and corralled the activity to Intensive Use Areas. Along with recreation trail riding, our off highway vehicles were used as necessary transportation to reach the farthest recesses of the forest for our hunting and fishing. Basic transportation and the removal of felled game are critical to accessing these remote areas for hunting, especially by our senior and disabled hunters. Yet, these activities are forbidden. As a matter of fact, even the designated trails are closed during the hunting season...What about our disabled hunters and seniors? (#344)

Response: The ANF annually provides many miles of disabled hunter access roads for use by disabled hunters. Cross country motorized use will continue to be prohibited. In addition, as a result of the Travel Management Rule, (November 2005) the ANF will initiate a separate transportation planning process that will culminate with the release of a Motorized Vehicle Use Map (MVUM) in July 2008. Motorized access alternatives will be analyzed with input from the general public. This decision will be analyzed and updated annually in accordance with 36 CFR 212, 251, 261 and 295.

Public Interest #359: The Forest Plan should restrict motorized recreation to limit impacts to natural resources, wildlife and other forest users.

Sample Statement: Consideration should be given to the impact on deer and other wildlife by ORVs and snowmobiles. Studies have proven that the noise from ORVs and snowmobiles can have a significant detrimental impact on deer metabolism. Trail locations should avoid areas of deer concentration as much as possible. A minimum distance of a 1/2 mile should be maintained. (#315)

Sample Statement: The erosion, noise pollution, safety issues, and spread of invasives on tires and axles are all reasons to limit the extent of ATV use in the ANF. ATV trails should be placed in areas where they will have the fewest negative impacts on the environment and ATV users should be educated on what they can do to help protect the forest for other users. (#431)

Response: Motorized recreation can only occur where authorized. No cross country motorized use is allowed anywhere on the ANF and ATV/OHM trail development is restricted to IUAs. The Suitable Uses and Activities section that begins on p. 29 of the LRMP outlines what and where activities can occur.

The IUAs were developed using a suitability/capability driven GIS model that is explained in Appendix B of the FEIS. This model evaluated many different resources and attempted to locate use in areas where the least amount

of impact would occur. The development of additional ATV and snowmobile trails will occur with the guidance of staff wildlife biologists and other resources specialists as well as public comment as required by NEPA.

Public Interest #360: The Allegheny National Forest should restrict motorized recreation and equestrian use in remote habitat and in MA 2.2.

Sample Statement: 1. Areas classified as remote habitat...should be excluded from consideration for IUAs and EUAs. Motorized use of these areas is incompatible with the remote characteristics of these areas, as is the use of these areas by large, organized groups of horseback riders. 2. Areas proposed as Management Area 2.2 should be avoided for IUAs, except when there is no other alternative and a connection between two separate IUAs is needed. (#235)

Response: Alternative Cm eliminates the Longhouse IUA which had the majority of newly impacted remote habitat and MA 2.2. Traditionally, and for the foreseeable future, as the horse trail system is developed, large group use will be centered on the EUAs. Cross country use outside the EUAs and in areas of concern to the respondent will likely remain minimal and sporadic. Monitoring outlined in the LRMP identifies the continuing concern that both forms of recreation could affect natural resources adversely and protocols are outlined to inform future managers of that possibility.

New Public Interest #361: The Forest Plan should utilize areas impacted by OGM development for motorized recreation.

Sample Statement: The Plan fails to consider how the subsurface consequences might be used as opportunities for alternative management objectives. For example, the plan fails to consider that areas subject to significant surface disturbance due to oil and gas extraction might subsequently be appropriate areas for motorized or other recreation activities. (#476)

Response: OGM development and motorized recreation effects are displayed in the Cumulative Effects sections of the FEIS. Impacts to resources can and do occur but are minimized through the use of mitigation measures. Given past experience with conflicts between OGM development and motorized recreation, the ANF is trying to minimize this interface with the modification of the IUA boundaries in the LRMP. Areas where historic interaction has accelerated physical or social problems have been either modified or dropped such as the Westline IUA and parts of the Twin Lakes IUA.

All-terrain Vehicles and Off-highway Motorcycles (ATVs and OHMs)

Public Interest #362: The Final EIS should fully analyze ATV/OHM Intensive Use Areas (IUAs).

Sample Statement: The FS intends to do a recreation study on ATV Intensive Use Area's after the Forest Plan is approved. ...The public needs to know the complete plan for ANF management before the Final Plan is adopted. (#295)

Response: The LRMP used IUAs to outline areas for proposed use. Similarly it also indicates areas where ATV/OHM use is not acceptable. Project specific trail planning and development within these areas is beyond the scope of the LRMP and will occur separately and be subject to the standard public comment period specified by NEPA.

Public Interest #363: The Allegheny National Forest should prohibit ATV/OHM and horse use on the forest.

Sample Statement: I think there should be no ATVs or horses on this forest. You need not accommodate inappropriate, confounding uses. (#20)

Response: Executive Order 11644 of Feb. 8, 1972, (appear at 37 FR 2877, 3 CFR, 1971-1975 Comp., p. 666) details the appropriateness of motor vehicle use on public lands. Horse use is also part of the multiple-use management strategy that offers the user a choice of activities during their visit. In addition, see response to PI #354.

Public Interest #364: The Allegheny National Forest should not add new ATV/OHM trails.

Sample Statement: The US Forest Service should not be in the business of providing “user developed trails” for motorized vehicles such as ATV's, motorbikes, snowmobiles, etc., this is the job of private enterprise. They use a disproportionate amount of trail space in addition to polluting the air, water, and soil; fragmenting habitat; displacing wildlife; and creating disturbing noises which can be heard throughout the Forest. The Forest Service is actually creating demand for more of these vehicles by providing trails for them. (#199)

Response: The Forest Service does not provide “user developed trails”. The Forest Service provides purpose built trails designed and constructed for an individual use or several uses (motorized or non-motorized use) that are determined to be compatible. In addition, see response to PI #363.

Public Interest #365: The Forest Plan should indicate who will manage ATV/OHM trail use.

Sample Statement: Who is going to oversee/manage trail use? (#2)

Response: The ANF will continue to monitor and enforce use regulations use on NFS lands, trails, and road systems. Pennsylvania State Patrol and local Sheriffs will monitor use on State routes, township roads, and private inholdings.

Public Interest #366: The Allegheny National Forest should not designate severely damaged areas as IUAs.

Sample Statement: The new ANF Forest Plan must not allow the Forest Service to use the designation of “Intensive Use Areas” (IUA) to describe areas severely damaged from industrial activities such as oil and gas drilling, road building, logging and ATV use and then change the management zoning to “IUA” to write the area off as a sacrifice zone in the ANF. (#295)

Response: The intent of designating an area as an IUA is to identify areas conducive to ATV and other motorized trail use. IUAs are managed for multiple uses and are afforded the same management prescriptions and protections as other areas of the forest. The IUAs were developed using a capability driven GIS model that is explained in Appendix B of the FEIS.

Public Interest #367: The Allegheny National Forest should construct all of the 300 miles of ATV trails that were authorized in the 1986 Forest Plan and apply user fees to defray the costs.

Sample Statement: The 1986 Plan...called for in excess of 300 miles of ATV trails within the Intensive Use Areas on the Allegheny National Forest. This objective has not been met and the preferred alternative C, by proposing 173 miles of ATV trails, indicates that there is no intention of ever having 300 miles of trail. In recent years, ATV use has become an increasingly popular form of recreation in the Allegheny National Forest, with revenue from ATV permits totally approximately \$221,790 in 2003, \$243,260 in 2004, and \$210,750 in 2005. Given the increased popularity of ATV use in the Allegheny National Forest, creating an excess of 300 miles of ATV trails would bring a greater number of people into contact with the Forest and ultimately create much needed economic benefits for local communities. (#484)

Sample Statement: Toward the goal of increasing trail mileage under the original Plan, the OHV User Fee collected in recent years would seem to have been collected for and applied to such development. However, it is also my understanding that none of these collected funds have been used for OHV trail development since no significant new trail mileage has been developed since the fee's implementation. If the riders knew that their permit money was specifically intended to develop and sustainably maintain new trail development,

there would be very little controversy over its payment and ANF should have willing partners in its promotion and compliance. (#41)

Response: The revision to the LRMP eliminates previous objectives unless they were specifically carried forward in the new LRMP. Additionally, changing conditions and new environmental regulations have directly affected the ANF's ability to construct the 350 mile system outlined in the 1986 LRMP without compromising natural resources or desirable user experiences. Design of the IUAs involved a suitability/capability model outlined in Appendix B that provided comprehensive results for the entire ANF. This approach was not possible during the creation of the 1986 plan as the technology did not exist at the time. Areas once thought to hold development potential were determined unsuitable for development and similarly areas not thought able to support development appear to have the capability to do so. Lastly, the model described in Appendix B (pp. B-58 to B-61) provides only estimates of expected output. Local on-the-ground conditions during individual project development will ultimately determine whether more or less mileage will result.

Fees collected through annual or daily permit fees are used directly for the maintenance of the current 108 mile trail system. Unfortunately, use of the current system is not high enough to pay for additional planning, design and construction necessary for the development of additional mileage.

Public Interest #368: The Allegheny National Forest should expand ATV/OHM riding opportunities in the Willow Creek area.

Sample Statement: I believe for a fact that the current Forest plan does not adequately address the need for more trails for motorized recreation. I've got a pretty good reason as why we need more places to ride and enjoy out sport, and I'm pretty sure you'll think so too. Motorized recreation, particularly the riding of ATV's and Off-Highway Motorcycles (for all intents and purposes, we'll call them OHMs), seems to be the dominant sport in the area when it comes to teens like myself in the outlying areas surrounding the ANF...I would personally love to see the expansion take place in the Willow Creek Area. As you can see, adding more trails will improve the economic and demographic factors in the areas surrounding the trail system. (#434)

Sample Statement: The Allegheny National Forest, at present, has 11 miles of ATV trails in McKean County, in the Willow Bay area. You have appropriated \$288,000 to do a study and you are going to add 44 miles of trails. Then in your plan C you are going to shut the Willow Bay area down. (#409)

Response: The LRMP does not preclude the addition of ATV trail mileage at the individual project level. The LRMP itself does not make decisions about adding trail mileage. The ongoing Willow Creek ATV Trail Expansion Project is addressing the addition of new trail to the existing Willow Creek ATV Trail.

Public Interest #369: The Allegheny National Forest should not eliminate the Westline Intensive Use Area due to the economic importance to the local community.

Sample Statement: We do not support the elimination of the Westline Intensive Use Area (IUA)...Westline is a destination for tourists and eliminating the connection to the community would have a negative economic impact on business in the village. We recommend that the alternative still provide a link to the community. (#203)

Response: Since no National Forest System ATV trails exist within the IUA and no changes are being made to the existing National Forest snowmobile trail system, elimination of the Westline IUA will not change the economy of the Westline community. The Westline community does enjoy a significant amount of business in the winter due to the immediate proximity of the Allegheny Snowmobile Loop (#1) and connectors 17, 18, 20, and 26. Providing a National Forest System trail link directly to Tack's Inn is not possible due to the large amount of private land that surrounds the Route 59 and 219 intersection. The ANF welcomes ideas about connectors that would enhance snowmobile trail use.

Public Interest #370: The Allegheny National Forest should create trails designated for Off-road Vehicle use.

Sample Statement: What I'd like to see is other roads that can be implemented for Jeep use only. ...Also I think the ATV trails could be used for this. (#386)

Response: The Forest Service will undergo future motorized use analysis to comply with the Travel Management Rule (11/2005) which will involve a public participation process. This process will culminate with the publishing of a Motorized Vehicle Use Map (MVUM) indicating where motorized travel of any kind is allowed.

Snowmobiles

Public Interest #371: The Forest Plan should indicate that expansion of snowmobile trails will be explored.

Sample Statement: The current draft concludes that no new snowmobile trails (other than connectors) are needed...I strongly encourage the document be amended to state: opportunities to expand the snowmobile trail system will be explored. (#42)

Response: The LRMP does not preclude the development of additional trails. Addition of actual trail mileage is a site specific decision. One goal (LRMP p. 13) and 3 objectives (LRMP p. 18) were developed for the LRMP that directly address snowmobile trail issues. They focused on providing additional opportunity for all trail users and specifically targeted snowmobile trail users' collaborative involvement. In addition, four critical connectors were identified for construction during the life of the plan.

Public Interest #372: The Allegheny National Forest should provide flexible snowmobile riding opportunities to support the Pennsylvania Wilds goal of providing connectivity across the Commonwealth.

Sample Statement: The economic impact of tourism in the area has been recognized by the Commonwealth of Pennsylvania through their Pennsylvania Wild initiative. This well funded effort, which includes a Detailed Recreation Plan, relies heavily on the utilizing of our public lands to attract visitors to the region. Snowmobiling is included in these efforts as is evidenced by the fact that the Pennsylvania DCNR recently awarded a grant to the PSSA to initiate a GIS trail mapping program with the ultimate goal of providing connectivity across the Commonwealth. Flexible riding opportunities within the ANF will enhance the ability to meet that goal and maximize the investment of these funds. (#115)

Response: The ANF is a full participant in the Pennsylvania Wilds initiative and collaborates with DCNR and PSSA to provide snowmobile recreation opportunities that support tourism opportunities during the winter months. See response to PI #371 for more details on elements in the LRMP that address snowmobile opportunities.

Public Interest #373: The Allegheny National Forest should establish an Open Unless Posted Closed policy to increase snowmobile access to forest roads and utility rights-of-way.

Sample Statement: We ask that the...Forest Plan Revision reflect that all roads are in "open unless posted closed" status. "An open unless posted closed" strategy has been used successfully for a number of years on other National Forests in Region 9. The ANF system currently makes up about 11% of the public land trail system in Pennsylvania and is annually funded by the Pennsylvania Department of Natural Resources at a negotiated level acceptable to the Forest Service. The provision of these additional low cost riding opportunities adds value to this annual investment. The 2005 SUS indicated 49% of statewide respondents felt an increase in riding opportunities on the ANF was in order. Only 25% termed the current opportunities as "adequate." (#115)

Sample Statement: Cross country travel opportunities should be provided in the Forest Plan Revision. Utility right of ways would provide additional riding and routing opportunities where such use is appropriate. This

practice is common in snowmobile riding areas given the minimal impact of such operation on this ground. The Allegheny National Forest has numerous camps which are utilized during snowmobile season. Providing the ability to access these camps by snowmobiling would allow the camp owners to recognize additional value from their investment with minimal impact to resources. It would also relieve an enforcement burden by providing low impact legal access. (#369)

Response: Some groups and individuals requested that the forest either use a “closed unless posted open” or an “open unless posted closed” policy to designate open and closed routes and areas. Both of these alternatives are problematic because of their reliance with signing on the ground. The new travel management rule ended this debate. National Forests are now required to produce a Motor Use Vehicle Map that shows by vehicle types, when and where routes and areas are open to motorize travel (36 CFR 212.56). The ANF will undergo travel management planning in 2008 and will produce a Motorized Vehicle Use Map locating motorized use across the ANF. The public will be responsible for obtaining and interpreting the MVUM. In the interim, the ANF will remain closed to cross country motorized use. A full public involvement process will be initiated before the publishing of the MVUM to assist in the determination of route location and use.

Public Interest #374: The Forest Plan should allow flexibility in snowmobile trail location around protected areas.

Sample Statement: Please consider the following in your future plans for the ANF: Flexibility in [snowmobile] trail location around protected areas. (#112)

Response: Site specific decisions are beyond the scope of the LRMP. Often minor reroutes do occur as a part of routine maintenance. Major reroutes require NEPA analysis to determine effects on all resources.

Public Interest #375: The Allegheny National Forest should utilize landowner contracts established under the Pennsylvania Sportsman’s Act of 1966 to obtain and maintain connector trails across private land.

Sample Statement: The Trail Standards comment on page III-9 “Legal and binding access across private land will be obtained prior to survey and design for construction of ANF trails and trail connectors”...This ruling in the Forest Plan will prohibit any proposed connector from happening. The USFS must continue to recognize and use documented “private property agreements” under the Pennsylvania Sportsman's Act of 1966 as used by snowmobile clubs on the ANF to date. The Sportsman's Act has been upheld in court (1990) and used successfully on the ANF from the late 1970's to date. This contract is what has held the current trail system in place for 30 years. (#249)

Response: We removed this standard and concluded that this issue is beyond the scope of the LRMP. These documents are an agreement with the current landowner and the club limiting the land owner’s liability. They convey no rights to the property, do not transfer with a change in ownership, and can be canceled at any time.

Public Interest #376: The Allegheny National Forest should open Tracy Ridge and Allegheny Front National Recreation Areas to snowmobile recreation.

Sample Statement: Tracy Ridge and Allegheny Front should be open to snowmobile travel and other low impact recreation. (#119)

Response: The LRMP will continue to manage these NRAs as a non-motorized recreation opportunity consistent with the emphasis on non-motorized recreation established in the PA Wilderness Act of 1984.

3.12.4 Developed Recreation

Public Interest #377: The Forest Plan should include tourism objectives that include the development of highly developed recreation and lodging, particularly around the Allegheny Reservoir.

Sample Statement: Local officials have made the case numerous times that the ANF will simply not support a thriving tourism industry without more opportunities for highly developed recreation, lodging and supporting services and amenities. A plan commissioned by Warren County in 1963, authored by Simmonds and Simmonds group, provided a detailed analysis of tourism opportunities on the ANF centered around the Kinzua Reservoir. Very few of the recommendations in the Simmonds plan were implemented. In 1986 local officials retained the Stormstown Group to determine the feasibility of a resort facility on the ANF. That study, as well as a subsequent study by Gannon University MBA candidates, found that a resort facility could be sustained and would provide positive economic impact to the region...The Desired Condition stated in the Proposed Plan does not envision anything other than the status quo regarding use of the forest by visitors. Consequently, the Proposed Plan contains no Objectives or changes in Management Areas that would support anything other than a continuation of current uses of the forest and certainly no advancement toward providing additional opportunities for highly developed recreation and lodging...The Proposed Plan must be revised to state a Desired Condition that envisions enhancement of the entire range of opportunities for visitors to enjoy and make use of the ANF, particularly in terms of highly developed recreation and lodging. In addition, Plan Objectives must be created to support the Desired Condition and, most importantly, additional Management Areas (MA 7.1) must be identified in the Proposed Plan that would support new uses attuned to tourism development, particularly in the vicinity of the Kinzua Reservoir. Merely stating that the ANF will conduct a recreation study subsequent to adoption of the Final Plan does not serve as a proxy for what should be in the Plan. Rather, the to-be-conducted study should add the detail necessary to move toward implementation of Objectives and examine site specific uses within Management Areas already determined by the Plan. (#333)

Sample Statement: Delineate areas on the plan map that are possible sites for recreation/lodging development, such as; Willow Creek, Sugar Bay area, and Kinzua Beach area. The Plan's discussion of Recreation in Appendix B-2 concentrates on miles of trails and does not address the significant increase of demand for upscale lodging and upscale campsites as reported by the Allegheny National Forest Vacation Bureau in its tally of requests by type and frequency. Lack of funding for such development is not a reason for not pursuing a project of motel/restaurant accommodations. This ignores the variety of funding and resources that are available from the private sector or other public agencies. (#201)

Response: LRMP design criteria indicate that recreational developments in the ANF are allowed consistent with the ROS class and recreational development levels. This creates a range of opportunities for recreational developments and partnerships within the ANF. More highly developed facilities would only be allowed in MA 7.1 (LRMP p. 135). Between Draft and Final versions of the LRMP, the ANF examined the potential of adding another MA 7.1 area at Sugar Bay. An evaluation revealed a number of resource problems, so the ANF decided not to add a MA 7.1 area at that location. Proposals consistent with MA 7.1 design criteria and other LRMP direction would be welcomed and evaluated by the ANF with appropriate site-specific NEPA analysis.

The question of what types of recreational developments are appropriate in what places is a site-specific issue rather than a Forest Plan issue. More detailed and specific information is needed to determine the feasibility of a particular site for such development. Due to the need to evaluate the entire area around the Reservoir for appropriate recreational opportunities, the ANF has retained the objective to complete a management plan for the areas surrounding the Allegheny Reservoir (LRMP p. 18). This can determine at a more specific level what types of recreational developments are appropriate and if any amendments are needed to the LRMP.

Public Interest #378: The Forest Plan should neither encourage nor discourage the development of a resort on the Allegheny Reservoir.

Sample Statement: With regard to recreation development around the Allegheny Reservoir, I think the PLRMP has taken the right approach by neither encouraging nor discouraging proposals for a resort and other large facilities. There is no sense in fighting over this unless and until there is a specific proposal on the table. (#262)

Response: This opinion is noted. See response to PI #377.

Public Interest #379: The Forest Plan should prohibit resort development on the Allegheny Reservoir.

Sample Statement: The FS's own recreation study shows that the reason visitors use the Allegheny Reservoir is because they love the undeveloped shoreline. This public asset needs to be protected in the New Forest Plan. (#295)

Response: Recreation development can occur in most areas of the ANF with the exception of MA 5.1/5.2 and MA 8.5 as long as it meets the intent of the MA design criteria. Larger developments are limited to MA 7.1. In addition, see response to PI #377.

Public Interest #380: The Allegheny National Forest should establish Hector's Falls as a recreation area.

Sample Statement: Hector Falls should be a tourist attraction, not a concealed and forgotten "party spot" in the woods for outlaws to abuse and litter on. The whole FR 258/258H area should be established as a recreation area, with picnic facilities and a nearby restroom. (#292)

Response: Management of Hector Falls is not a Forest Plan decision and would be the subject of a site-specific analysis.

3.13 Scenery

Public Interest #381: The Allegheny National Forest should develop a viewshed plan to protect the visual quality of scenic byways and recreation venues.

Sample Statement: Although scenery is mentioned in the context of even-aged management, we recommend an action item for the ANF Plan of drafting a set of guidelines to protect the viewshed of established scenic byways and recreation venues. As a working forest with active timber, gas and oil extraction, smart planning can protect viewsheds along scenic byways, trails and recreation areas. (#100)

Response: The Scenic Integrity Level (SIL) Map guides the management and protection of all scenery on the Forest, including scenic byways and recreation use areas (see LRMP, forestwide Design Criteria, 2380 Scenery, pp. 62-64). Other valued landscapes include the viewshed of roads, trails, use areas, rivers and streams as mapped in the FEIS and listed in Appendix B, Scenery (pp. B-63 to B-67).

3.14 Cultural and Heritage Resources

3.14.1 General

Public Interest #382: The Forest Service should allow interested parties to monitor cultural resource impacts.

Sample Statement: Heritage resources need to be managed on a consistent basis. Monitoring of sites needs to be increased, and the people with the most knowledge and interest in the sites need to be involved. Sites that have been mismanaged need to be highlighted as examples of what not to do, and then a process should be outlined in the plan that indicates how these sites will be managed in the future and in a manner that is consistent with the plan. (#503)

Response: The LRMP does not preclude interested parties to monitor Forest Service management of cultural resource sites. Section VI and Attachment C of the Programmatic Agreement (LRMP p. 62) both entitled “Public Participation” provide specific provisions for notification and participation of interested parties on measures taken to identify, evaluate, protect, and manage cultural resources. Stipulation III (A) of the P.A. specifically states that “Preservation planning includes public participation. Public involvement is most meaningful when it is used to assist in defining values of properties and preservation planning issues. Early and continuing public participation is essential to the broad acceptance of preservation planning decisions.” Stipulation III (B) of the P.A. provides a process for consultation and coordination among Native American Tribes and other interested parties. According to Stipulation III (G) of the P.A., “The Forest shall follow 36 CFR 800.5 for undertakings that may adversely affect historic properties. This would include consultation with SHPO and interested Indian Tribes and/or interested persons.” Section IV of the P.A. entitled “Monitoring” as well as section IV of Appendix B of the P.A. entitled “Monitoring Protective Measures on Site” specifically addresses monitoring. Beyond LRMP and project implementation activities, Section VIII (4) of the P.A. also addresses this Public Concern by “Implementation of an ARPA (Archeological Resources Protection Act) monitoring program in areas where site vandalism and destruction, and artifact theft, are problems.”

Public Interest #383: The Final EIS should detail the status of and prioritize National Register nominated sites.

Sample Statement: What is the status of National Register nominations for both prehistoric and historic sites across the Allegheny National Forest? Does any such plan exist? Has the existing site database been examined to identify the range of sites that have been identified? Have sites been looked at in terms of ranking according to value for specific types of research, potential for vandalism, potential for destructive impacts through erosion or encroachment by construction, etc. Similarly, is an annual list compiled that provides information on site status? By this we mean how many sites are actually regularly examined during the year to check on their condition and make a determination regarding security. (#503)

Response: Although a number of prehistoric and historic sites have been determined eligible for inclusion on the National Register of Historic Places (NRHP), none have been formally nominated as yet to the NRHP. The Programmatic Agreement (P.A.) identified in the LRMP (p. 62) provides a plan for nominating all previously determined NRHP-eligible sites as well as others to the NRHP. Sites have been looked at in terms of ranking according to their value for specific types of research, potential for vandalism, potential for destructive impacts through erosion or encroachment, etc. on a project level basis. This information is provided in Cultural Resource Reports (CRR's) for each proposed project. At present, there is no compilation of an “annual list.” However, this information is added to a database that tracks such information as well as other data about the sites. The number of sites that are actually regularly examined during a particular year varies according to the number of projects that are proposed, the previously recorded sites within a particular project area, the areas of potential effect within

the general project area, the likelihood of potential direct and indirect effects, the significance or potential significance of each site, and limitations of funding, project timeframes, and other priorities. In addition, a select number of significant heritage resources are regularly monitored on a yearly basis.

Public Interest #384: The Allegheny National Forest should develop a heritage resources program to encompass data storage and analysis and site interpretation.

Sample Statement: Does the ANF currently have a long-term plan for the Heritage Resources Program? If so, then we would like to obtain a copy of that document. If not, then is there a plan to produce such a document? This actually ties in to most of the other topics. It asks first what has been done with all of the data collected to date. Secondly, whether that data has been used to formulate a plan for interpreting existing sites. Third, can newly discovered sites be easily incorporated into the database to enhance our view of human occupation across this region? (#503)

Response: The Programmatic Agreement (P.A., referenced on p. 62 of the LRMP) does set out a long-term framework for the Heritage Resources Program for historic preservation planning. The P.A. specifically states that “[the] Forest shall follow the Secretary of the Interior’s *Standards for Preservation Planning* which outlines a process that organizes preservation activities (identification, evaluation, registration and treatment of historic properties) in a logical sequence. The Standards for Planning outlines a process that determines when an area should be examined for historic properties, whether an identified property is significant, and how a significant property should be treated. Prior to the development of the P.A., the ANF produced a *Master Interpretive Plan for the Allegheny National Forest* that will guide the development and implementation of interpretive exhibits and services for the ANF. Newly discovered sites can be easily incorporated into the database to enhance knowledge of human occupation across the region. In addition, see response to PI #382.

Public Interest #385: The Final EIS should evaluate streamlining Phase 1 reporting and improving the forestwide heritage site database.

Sample Statement: Unless there are regional or national mandates to the contrary we would think that shorter reports on Phase 1 work would be appropriate and that greater emphasis be placed on evaluations and integrating the work into a better understanding of the what the current database has to offer in terms of prior settlement and land use across the Forest. (#503)

Response: We agree and have added an objective to emphasize evaluation of sites (LRMP p. 18). The Programmatic Agreement referenced on p. 62 of the LRMP emphasizes the development and use of historic contexts as the foundation for all decisions on heritage resources. It also emphasizes streamlining the Section 106 process through the use of shorter reports when no historic properties are identified or affected by proposed projects.

Public Interest #386: The Final EIS should review the Phase 1 and Phase 2 surveying of cultural resources.

Sample Statement: After almost forty years of Phase 1 level survey work there must be some generalizations that can be made about the resource base on the ANF that differs from that proposed in early models. Are there any targets for the level of sites to be investigated through Phase 2 testing? A.) What about updating the range of lumbering-related sites and any other large categories of historic resources? B.) Are prehistoric sites being examined for distributions in relation to micro-level environmental zones, watershed similarities/differences, general density drop-offs on the interior plateau, continuity of trail use, etc.? (#503)

Sample Statement: Are any studies being considered that look for relationships between different nearby sites of similar age or apparent function? - We continue to receive massive reports on projects and CR surveys done for large tracts of land. The amount of new information is generally minimal and the incorporation of existing data also falls short of the mark. We would rather see an effort made to synthesize, or at least summarize, existing site data rather than simply rehash what has been done in the past and fill dozens of

pages with copies of site forms. - There have been several reports recently done in Pennsylvania focusing on settlement pattern studies within watersheds and/or larger regions of the state. The ANF might be better served by incorporating some of that material with their site database to see how their data compares. (#503)

Response: All the concerns mentioned above are valid concerns that the Programmatic Agreement referenced on p. 62 of the LRMP, among other things, seeks to address. It strongly emphasizes the development and use of historic contexts to formulate goals and priorities for the identification, evaluation, registration, and treatment of significant cultural resources. Historic contexts, associated property types, and criteria for evaluation to the National Register of Historic Places have been developed for the historic lumber, petroleum, iron, and coal industries. As for prehistoric sites, the Programmatic Agreement outlines a process for the Forest to carry out appropriate identification efforts that take into account past planning, research and studies, the views of the Pennsylvania State Historic Preservation Office and the Seneca Nation of Indians Tribal Historic Office. Presently, there are several settlement pattern models and site predictive models that address the distribution and density of prehistoric sites across the Forest and across different landforms. The Programmatic Agreement seeks to address these issues by requiring all future investigations to synthesize previous investigations and existing settlement pattern models and to analyze the results of the investigations to further refine not only archaeological knowledge of the upper and middle Allegheny watersheds but also to gain a better understanding past human use and occupation of the various landforms within the ANF.

Public Interest #387: The Forest Plan should provide for the preservation and interpretation of the World War II POW camp located within the Allegheny National Forest.

Sample Statement: My comment deals with the preservation and interpretation of the World War II German prisoner of war camp located on the national forest. Please include reference in the plan to the need to inventory the site, preserving all that remains of the site (i.e., foundations, artifacts, etc.), and eventual interpretation of this amazing history from the 1940's. Many people do not even realize that there was a German POW camp so close to the town of Kane. Please tell the story so others may become better informed. (#43)

Response: As part of previous LRMP implementation projects, the above referenced site was inventoried and all visible remains of the site were mapped and recorded. Initial efforts to interpret this site to the public have included erecting an historical marker at the site. Forest Plan Revision does not preclude other interpretive efforts at the site.

3.14.2 Native American Resources

Public Interest #388: The Allegheny National Forest should develop a process for consultation and collaboration with the Seneca Nation of Indians regarding the management of matters and resources of cultural importance.

Sample Statement: A general categorization of the cultural sites that may be perceived as relevant to the Seneca Nation within the ANF should be developed in consultation with appropriate representatives of the Seneca Nation, shared with the appropriate representatives of the Seneca Nation, and then provided high confidentiality status. A description of this process should be addressed in the plan. (#503)

Sample Statement: Prior to any planning or implementation of heritage tourism at a site that may be perceived as culturally relevant to the Seneca Nation, appropriate representatives of the Seneca Nation should be given an opportunity to provide concerns about areas and consulted on how to mitigate these concerns. (#503)

Sample Statement: Present and future identified sites that are culturally specific to the Seneca Nation should not be considered for the National Register for heritage tourism purposes, without meaningful and consistent consultation with appropriate representatives of the Seneca Nation. (#503)

Response: The ANF recognizes the concern to develop a process for consultation and collaboration with the Seneca Nation of Indians (SNI) regarding the management of present and future identified heritage resources of cultural relevance to the SNI. Towards effectively addressing this concern the LRMP has a goal (LRMP p. 13), an objective (LRMP p. 19) and a standard (LRMP p. 62) to work with the SNI to develop the inventory of heritage resources of interest to the SNI and to consult and collaboratively work directly with appropriate representatives of the SNI before making a decision on any activities within the vicinity of inventoried sites culturally sensitive to the SNI.

Public Interest #389: The Forest Plan should emphasize Native American history in the region through education and interpretation.

Sample Statement: Specifically, we find no detailed strategy for interpretation of the Native American history of the region, or other historic areas. We recommend that historic area designation and interpretation be emphasized. In the summary report, only road less areas and wilderness designations are listed as areas of special concern. Efforts to enhance, protect and interpret heritage sites are vitally important. Historic sites and artifacts once lost cannot be regained. (#100)

Response: The LRMP does not preclude interpretation of Native American history. The Programmatic Agreement has guidelines for interpretation. The Buckaloons Special Interest Area is one area of the ANF where such efforts could be initiated. The LRMP does not preclude other areas of the Forest to be interpreted as well.

Public Interest #390: The Allegheny National Forest should allow the Seneca Nation of Indians to curate items removed from indigenous cultural sites.

Sample Statement: The Seneca Nation would like to curate items removed from a cultural site that is Indigenous in origin or could be perceived as Indigenous in use. (#503)

Response: All cultural material recovered in heritage resource management activities are property of the U.S. Government. As such, Federal agencies like the USFS and its administration units like the ANF are required by law to curate all such cultural material in a curation facility that meets federal standards. Presently there are only two such facilities in Pennsylvania that meet these regulations. If the SNI has or develops such a facility, the LRMP would not preclude such a possibility.

Public Interest #391: The Final EIS should finalize a procedure, in addition to basic procedures established by the Pennsylvania State Historic Preservation Office, for collaborating with the Seneca Nation of Indians when human remains are discovered within the ANF.

Sample Statement: Are there protocols that have been formalized forest-wide for the inadvertent discovery of human remains during construction/maintenance activities by either the Forest Service or contractors working on ANF lands? A.) Specifically, we are asking if there are protocols specific to dealing with the Seneca Nation in addition to any basic procedures previously established by the Commonwealth of Pennsylvania through the Pennsylvania SHPO's office. B.) We know that this ground has been covered...but we are not certain that a final document was ever produced. - The principal reason for bringing up this subject is that we really need to have actual formal documents on file that all parties can refer to when situations like this arise...We are uncertain if we ever did receive a document that spelled out precisely what steps need to be taken when inadvertent discoveries are made. (#503)

Response: Given the fact that the lands which now encompass the ANF were historically considered part of the Seneca Nation, the ANF recognizes the rights of lineal descendants and members of the Seneca Nation to retain

certain human remains and associated grave goods whenever such discoveries are made on the Forest. In the rare instances where such discoveries have been made since the 1986 Forest Plan, these instances have occurred at a specific location on the ANF and were effectively addressed through consultation and collaboration with the SNI. In general, the ANF follows the policy developed by the USDA Forest Service for its Southern and Eastern Regions which states that it is the policy of the USDA Forest Service to treat human remains with dignity and respect for the wishes of the deceased individuals they represent and living people with who they are affiliated. The LRMP does not preclude the development of an agreement document specifically with the SNI to address procedures and action time frames for all instances where it is necessary to disturb known burials and will address procedures and action time frames for those circumstances where burials are unexpectedly encountered.

Public Interest #392: The Allegheny National Forest should sustain the historical interaction of native people with the forest.

Sample Statement: Maintaining a healthy forest should include the requirement of the forest to contain and sustain human interaction, especially in relation to human health. Producing areas that promote the health of the forest and human health should be a worthwhile objective of the Forest plan. Additionally, a goal should be to perpetuate historical interaction with the forest by Native peoples. (#503)

Response: The LRMP does not preclude administering its programs and activities to be sensitive to traditional Native peoples, especially with regard to their religious beliefs and practices. The Programmatic Agreement, LRMP p. 62, encourages consultation with the SNI to identify and acknowledge these cultural needs in Forest Service activities, to consider these values an important part of management of the ANF, and to gain an understanding and appreciation of Native culture, religion, beliefs, and practices.

Public Interest #393: The Allegheny National Forest should consult with the Seneca Nation of Indians to obtain carbon dates from known cultural and archaeological sites prior to herbicide application.

Sample Statement: Another area of concern is the selective use of herbicides used on earthworks, cultural sites, and other archaeological sites. Herbicide use may alter carbon dates, carbon dates should be obtained prior to herbicide treatment of known sites. ANF should work on a process to test the site in consultation with appropriate SNI [Seneca Nation of Indians] representatives (#503)

Response: Towards effectively addressing this concern the ANF has added the following standard in the LRMP (p. 62): “Consult directly with appropriate representatives of the Seneca Nation of Indians (SNI) before making a decision on any activities within the vicinity of inventoried sites culturally sensitive to the SNI.” In addition, see response to PI #200 on carbon dating and herbicides.

Public Interest #394: The Allegheny National Forest should consult Seneca Nation of Indians representatives to develop a process for removing vegetation from cultural sites.

Sample Statement: While it is important to remove vegetation that could affect a known cultural site, especially large trees that may become wind thrown and subsequently damage a site, the process for removal of the vegetation should be developed in consultation with appropriate representatives of the SNI. (#503)

Response: Towards effectively addressing this concern the ANF has added the following standard in the LRMP (p. 62): “Consult directly with appropriate representatives of the Seneca Nation of Indians (SNI) before making a decision on any activities within the vicinity of inventoried sites culturally sensitive to the SNI.”

Public Interest #395: The Allegheny National Forest should increase law enforcement in culturally sensitive areas susceptible to erosion.

Sample Statement: Maintaining a recognizable and meaningful presence in areas that require increased attention due to erosion or the possibility of erosion to culturally sensitive areas should be carried out by as many Law enforcement entities as are available. (#503)

Response: The LRMP does not preclude an increased law enforcement presence in culturally sensitive areas susceptible to erosion. Section VIII A (4-5) of the Programmatic Agreement referenced on p. 62 of the LRMP includes reference to the Forest implementing an ARPA (Archeological Resources Protection Act) program in areas culturally sensitive areas where such problems exist. ARPA investigations are conducted in concert with law enforcement. When ARPA violations are identified, law enforcement officers assigned to the case determines the level of law enforcement that is necessary and needed in such circumstances.

Public Interest #396: The Forest Plan should include measures to prevent further erosion of culturally sensitive sites.

Sample Statement: After meeting the general need to address erosion, measures should be introduced to prevent further erosion of ANF lands that contain culturally sensitive materials of the SNI [Seneca Nation of Indians]. These measures should be included in the plan. (#503)

Response: The LRMP desired condition (p. 12) envisions stabilization of erosion problems that may impact cultural sites. The LRMP does not preclude implementing appropriate measures that would serve to protect Native American culturally sensitive properties.

Public Interest #397: The Allegheny National Forest should provide research, transfer of technology, and technical assistance to the Seneca Nation of Indians.

Sample Statement: As stated in FSM 1563(4), “provide research, transfer of technology, and technical assistance to Indian governments.” (#503)

Response: This issue is not a Forest Plan decision. However, the LRMP does not preclude these activities.

Public Interest #398: The Allegheny National Forest should provide Seneca Nation of Indians law enforcement officers jurisdiction to protect cultural sites on the forest.

Sample Statement: Enforcement of plan objectives and or general Forest management in cultural areas that are known to be impacted by human intrusion and that also can be easily patrolled by SNI Law Officials should be provided enforcement jurisdiction (#503)

Response: This is an implementation issue and is not a Forest Plan decision.

Public Interest #399: The Forest Plan should include a goal for training personnel on Native American issues.

Sample Statement: The Seneca Nation noticed that there is no mentioning of a process to educate ANF staff in relation to issues that are of concern to the SNI, specifically the education of ANF staff in the context of government-to-government relationships with Native Nations, cultural sensitivity training, cultural resource identification, and interpretative methodology. This process should be developed in consultation with appropriate representatives of the Seneca Nation and then be included in the plan. (#503)

Response: The training of ANF personnel is an implementation issue and is not a Forest Plan decision. However, we agree that the training of ANF employees regarding both Native American heritage resources and other heritage resources is an important part of implementing cultural and heritage resource management.

Public Interest #400: The Final EIS should address the Seneca Nation of Indians concerns about cultural resources within the Allegheny Reservoir.

Sample Statement: What plans does the Heritage Program have either in-hand, or in-process, that address the continuing concerns about cultural resources within the limits of the Allegheny Reservoir? A.) Specifically, are there any projects designed to assess site survival or otherwise expand on the topics considered by the COE's drawdown study? B.) Has any thought been given to implementing simple examinations of recorded sites when reservoir levels allow them to be visited? - Specifically, we would be interested in knowing if these older recorded sites are still intact. If they are not, then it would be worthwhile to know what the mechanism of their destruction actually entailed. (#503)

Response: Although this is a site-specific issue and not a Forest Plan decision, the Allegheny National Forest shares the Seneca Nation of Indians concerns about cultural resources within the limits of the Allegheny Reservoir. Towards addressing those concerns, members of the ANF's Heritage Resource Management Program assisted the Army Corps of Engineers Waterways Experiment Station in a study on cultural resource management issues within the Allegheny Reservoir. The study recounted the special challenges that the Corps faces with the ownership, jurisdiction and management of the cultural resources within the drawdown zone of the Allegheny Reservoir. The LRMP does not preclude the ANF from expanding on the Corps study with regard to cultural resources on Forest Service land. The legal responsibility for mitigation of the adverse effects caused by the operation of the reservoir remains the responsibility of the Corps.

3.15 Social and Economic Issues

3.15.1 General

Public Interest #401: The Final EIS should analyze impacts to the local customs, culture, and economy.

Sample Statement: The National Environmental Policy Act states that there is a Federal responsibility to, among other issues, "preserve historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment which supports diversity and variety of individual choice." The proposed Forest Management Plan is extremely weak in regard to the true and realistic impact that the advocated practices within the Plan will have upon the customs, culture and economy of the people living in Forest, Warren, Elk, and McKean Counties...The Plan needs to take an honest look at the human impacts resulting from management decisions made by the Forest Service. (#438)

Response: The Social Conditions section of the FEIS (3.4.8) compares the long-term trends of the Allegheny National Forest four-county region to those of other county groupings with similar characteristics, such as resource endowment and distance from urban centers, as well as with all rural counties in the Commonwealth. These long-term trends, some of which pre-date the establishment of the Allegheny, are very similar in terms of demographics, income, education, and other characteristics. This indicates larger social and economic changes at work, ones independent of the actions guided by the LRMP. The Economics section (3.4.7) gives significant detail and analysis regarding economic impacts to this region.

Public Interest #402: The Forest Plan should contain a vision of how the ANF can contribute to social and economic sustainability.

Sample Statement: I have spent a great deal of time analyzing the proposed plan only to find there is no vision, goals, objective or strategy to ensure social and economic sustainability. Among the nearly 1450 pages of documentation, you can find a plethora of information about how ecological sustainability will be achieved, but scarcely little about how the culture, customs and economy of the region will be maintained. A whole host of measures have been proposed that reduce the area for active land management making it

increasingly harder to provide opportunities for economic benefit. This downward spiral, which began with the 1986 plan, must be reversed if ever there is to be an assurance of true socioeconomic progress linked to the ANF. (#455)

Sample Statement: The plan must include a vision statement devoted to the sustainability of social and economic elements of management planning as required in the Code of Federal Regulations. The vision statement must include desired conditions, goals, objectives, and management direction designed to address social and economic sustainability for the region. As an integral part of the local fabric, the ANF must respond to the socioeconomic well being of the area. The LRMP must delineate the manner in which the Forest Service expects to fulfill their “good neighbor” role. (#462)

Sample Statement: We support the greatest economic output that the forest can sustain for the support of the local communities and rural traditions. The plan has a responsibility to evaluate and create a plan that gives equal attention to ecological, social and economic issues of the region. While this plan DEIS abound in ecological data, very little is devoted to the social and ecological data, very little is devoted to the social and ecological implementation of the plan. We view this as a serious flaw, and it is reflected in the alternatives. Jobs that are created through timber harvesting, oil and gas development and recreation must be maintained at levels that can sustain the rural heritage of the region. There is no part of the plan that addresses how the ANF intends to do this. (#97)

Response: The LRMP contributes to economic and social sustainability of the surrounding region. It does not maintain either the local economy or local culture. That is beyond the scope of the plan or the mission of the Forest Service. This contribution in the LRMP to local communities is primarily through the identified uses of the ANF described in Desired Condition section of the LRMP. Goals and objectives in the LRMP provide more specific identification of intended contributions intended during the planning period. Many of these contribute to local economic and social sustainability. Most of the FEIS material does focus on effects to the ecosystem of the ANF as required by law in the preparation of an EIS. There are also substantial sections of Chapter 3 of the FEIS describing effects on aspects of the social and economic environment of the ANF. These include Minerals and Geology, Transportation, Recreation, Economics and Social Conditions.

Public Interest #403: The ANF should provide special consideration to sustaining and improving its economic contribution to local communities.

Sample Statement: The four counties that comprise the ANF are in a state that is among the lowest of performers in economic growth, are within a region of the state that is the lowest performer in economic growth, and themselves are at the lowest rungs of performance in the region. In fact, Forest County is currently designated as a “distressed county” by the Commonwealth of Pennsylvania and Warren County has led the state in recent years in net job losses. The National Forest Management Act requires the Forest Service to draft its management plans in the context of a current analysis of local economic and demographic factors. Based on this analysis, “attention should be paid to the uses, values, products, or services that the Forest Service is uniquely poised to provide”. As stated above, the ANF is unique among national forests in terms of the value of timber and the impact that the sale of that timber can have for the economies of the forest communities. Given this dire economic situation and the potential of the ANF to provide substantial economic benefits to its host communities, special consideration should be made to promoting uses of the forest that maximize the economic benefit to the communities within the ANF in a manner consistent with other multiple use objectives. Alternative C is unacceptable from this stand point and the proposed plan must be revised to yield a greater economic benefit for the communities of the ANF. (#333)

Sample Statement: The County's primary concern is on sustaining and improving the economic contribution of the ANF from timber harvests, research and experimentation, education, and tourism. School districts, Townships and Boroughs depend heavily on the financial support provided from the activities on the ANF. For example, Corydon Township is approximately 90% ANF. Alternative, A, B, and C indicate a significant increase in economic impact. Compared to the previous five year period, the new Plan requires a much more

aggressive management of revenue generating activities presenting significant challenges. A healthy forest, productively managed, under a plan that supports aggressive regeneration will lead to long term benefit for McKean County and the other surrounding counties. (#201)

Sample Statement: I believe some modifications to Alternative C, preferred by the Forest Service, are needed to strengthen the management of the forest over the next 20 year planning cycle. Part of being a sustainable forest is to be sustainable economically. The ANF has a huge economic impact in the region. The value of the forest products is not the only issue. The trickle down effects of the forests values permeates throughout our local economies. Sawmills, paper mills and other wood product industries desire the wood products. The oil and gas industry and the recreation industry are tied to the management of the ANF. They all have employees buying homes, vehicle's groceries, fuel and many other goods and services locally, as well as paying local taxes. These companies employ many contractors doing all these same things. The timber, oil/gas and recreation industries that operate in and around the ANF are vital to the economic health of the region. The ANF payments back to the local communities are very important too. These small government entities depend on this income to provide services to their limited tax base. The additional jobs, labor income and payment to local governments generated by Alternatives A and B are much more desirable than Alternative C. (#452)

Response: The ANF is aware of the difficult economic situation faced by the four county region. This is described in the FEIS (pp. 3-399 to 3-410). This section of the FEIS also describes that the major ways in which the ANF can influence economic activity in the four county region is through providing a diversity of recreation opportunities, providing wood for harvest and processing, payments to local governments and direct expenditures of the ANF. While the oil and gas industry also makes a substantial contribution to the local economy, these are the actions of private owners in those industries. The ANF does not have the ability to either accelerate or reduce this activity.

As the analysis in the FEIS indicates (pp. 3-410 to 3-419), full implementation of all of the Alternatives (in particular Alternatives A, B and Cm) has the potential to provide for an increased contribution to local employment, labor income and payments to local governments. This analysis includes consideration of secondary and tertiary economic impacts of increased economic activity enabled by the ANF. The ROD (p. 16) acknowledges how the ability to contribute to local economies contributed to the selection of Alternative Cm.

Public Interest #404: The Forest Plan should describe the role the ANF can play in catalyzing benefits for the local community and the ANF.

Sample Statement: The ANF has a significant impact in the Allegheny Plateau, especially the four counties surrounding the Forest. The Forest can use this situation to be a leader and convener regarding forest and natural resource management issues. The plan describes many possible goods and services, but mentions little about the critical role the Forest can play in catalyzing benefits for the local community and the ANF itself. (#158)

Response: The Forest Plan Revision is primarily focused on the management of ANF itself and how forest management will affect both the ANF and the surrounding communities. In the process of developing the Forest Plan Revision the ANF reached out to a variety of other partners in the management of the ANF. These include state, local and tribal governments, industry groups, recreational groups and conservation organizations. The ANF intends to continue to build on these relationships to foster not only improved management for the Forest, but a shared sense of responsibility for the future of the ANF and the surrounding communities.

Several goals and objectives in the LRMP speak explicitly to some of these aspirations for continued collaborative work with key partners. These include:

- the Pennsylvania Wilds program (LRMP p. 13)

- Snowmobile trails (LRMP pp. 13 and 18)
- Cultural resources (LRMP pp. 13 and 19)
- Special forest products (LRMP p. 14)
- Air pollution (LRMP p. 14)
- Oil and gas management (LRMP pp. 15 and 20)
- Land adjustments (LRMP p. 15)
- Acquisition of subsurface lands (LRMP p. 21)

3.15.2 Recreation

Public Interest #405: The Allegheny National Forest should acknowledge the growth and importance of recreation in and around the forest.

Sample Statement: We have reviewed the last page of the Potential for Growth and find that the estimate of tourism contributed to Total Sales (2%) and Total Employment (5%) seem very low. When you look at the year round nature of tourism and the fact that the ANF is the only National Forest in Pennsylvania, we find these figures very low. Both direct and indirect sales and employment must be considered and we feel it is much higher. (#100)

Sample Statement: Recreation in national forests provides many more jobs and much more income for local communities than does logging. According to a 2000 study by the economic accounting firm ECONorthwest, recreation, hunting, and fishing in national forests generate about 2.9 million jobs and add about \$234 billion to the national economy each year. By contrast, logging, mining, grazing, and other extractive uses in these forests add about 407,000 jobs and \$23 billion to the economy per year. (#295)

Response: Estimating levels of economic activity associated with national forest visitation on a local area economy is a very difficult task with considerable uncertainty. This difficulty includes estimating the level of visitation, the proportion of visitation originating outside the four county area, the level of expenditures made by visitors to the four county area and the sectors impacted by that spending. The FEIS does not provide any total estimates of tourism impacts, only of the contribution of the ANF to local economic activity. The ANF analysis presented in Chapter 3 of the FEIS (with additional technical information in Appendix B) does estimate that recreation activities currently and in all of the Alternatives provides a larger contribution to employment than timber harvest.

Public Interest #406: The Final EIS should acknowledge the economic impact of hunting and fishing.

Sample Statement: The economic impact of the outdoor sportsmen and women upon the economy of Pennsylvania propels our state to the forefront of recreational and financial success. Monetary gains from our sport are the very lifeblood of many small towns and hamlets. (#320)

Response: The economics section of Chapter 3 of the FEIS has been modified to identify the economic contribution from hunting and fishing. These contributions are combined with recreation economic contributions. An estimation of the current levels of hunting and fishing activity and the estimate for each Alternative is contained in the Appendix B of the FEIS discussion of economic impacts.

Public Interest #407: The Forest Plan should emphasize motorized recreation use to provide benefits to the local economy.

Sample Statement: While considering the debate over revising the Forest Plan for ANF, consider the revenue loss the Commonwealth experiences due to failure to include motorized recreational vehicles in its plans. A substantial amount of money is spent in other states annually by ATV, snowmobile and other motorized RV users due to a lack of approved terrain to explore in Pennsylvania...Pennsylvania is missing out on the revenue generated by other more “off highway vehicle” friendly states, such as New York. (#336)

Response: The ANF currently, and in all LRMP Alternatives, provides for ATV/OHM recreational opportunities. Estimates of ATV/OHM visits are contained in Appendix B of the FEIS. The economic impact of this activity is identified as part of the economic impacts associated with recreation.

Public Interest #408: The Allegheny National Forest should emphasize non-motorized recreation over motorized recreation, timber harvest and OGM development to benefit the economy.

Sample Statement: The Forest Service must do more to promote low-impact, remote recreation opportunities. It is unacceptable for the Forest Service to tell the public that as a result of oil and gas drilling, “those seeking a more remote and less developed recreation experience could be displaced to other State or National Forests where remote, semi-primitive settings and experiences are more readily available.”(DEIS, pg 3-276) According to recent findings released at the 2006 Outdoor Retailer Summer Market, muscle-powered recreation (bicycling, camping, fishing, hunting, paddling, snow sports, trail and wildlife viewing) pumps \$730 billion into the US economy every year. This results in nearly 6.5 million jobs across the US and generates \$88 billion in annual state and national tax revenues. This is what the Forest Service should be promoting instead of telling people to go to other State or National Forests so that oil and gas drilling can continue at record levels and the Forest Service can focus their recreation budget on ATV's. (#124)

Sample Statement: While jobs and employment are of great import to rural communities, it must be recognized that the continued degradation of the forest through a variety of extraction activities (including logging as well as oil/gas drilling) actually undermines the greatest potential for the ANF: namely, the jobs that can be created through ecotourism, identified as among the fastest-growing economic sectors with the greatest potential for long-term economic stability in rural communities nationwide. The Allegheny, with its close proximity to no less than a third of our nation's population, represents tremendous opportunity far beyond the Buckaloons campground. This potential is vastly understudied, underrated, and underestimated by your agency. (#150)

Response: The economic contribution of recreation to the local economy is described in the FEIS section 3.4.7 Economics. Appendix B of the FEIS (pp. B-83 and B-84 and B-93 to B-95) describes the economic impact analysis related to recreation activities. The ANF is a full participant in the Pennsylvania Wilds initiative to attract more recreational visitors to the area. The FEIS (p. 3-419) also acknowledges the potential for this initiative to increase recreation visitation to the ANF with potential increases in employment and labor income

Timber harvest and oil and gas development also make substantial contributions to the local economy. The lack of subsurface ownership leaves the possibility that private owners may seek to develop their mineral estate in areas that the ANF would prefer remain undeveloped. For this reason the LRMP has more specifically clarified its objective to acquire the subsurface rights under these areas. See PI #94 for further discussion on the acquisition of subsurface rights.

Among the changes in the LRMP as compared to the 1986 Forest Plan is to create more non-motorized recreation opportunities from the areas of the ANF that have not been previously roaded. See the ROD for rationale for decisions on recreation allocations (pp. 16-24) and consideration of oil and gas (p. 29).

Public Interest #409: The Final EIS should analyze the economic impacts OGM development will have on recreation.

Sample Statement: The DEIS Economic Analysis is flawed because it grossly underestimates the economic damage to recreation from oil and gas development. (#295)

Response: There is no way to reliably predict the actions of private subsurface oil and gas developers, its effect on recreation, or the loss of economic impact or value. The ANF currently estimates over a million recreational visits to the forest while a substantial portion of the ANF has already been developed for oil and gas. Much of this recreational activity does not occur in areas intensively developed for oil and gas and much of it is concentrated in certain areas such as the Allegheny Reservoir and the Allegheny River. The FEIS (pp. 3-327 and 3-419) acknowledges the potential adverse impacts oil and gas development could have on recreational opportunities, especially semi-primitive recreation opportunities. The LRMP contains objectives to acquire subsurface rights to minimize this impact.

3.15.3 Wilderness

Public Interest #410: The Final EIS should acknowledge that there is limited economic benefit in designating additional wilderness areas.

Sample Statement: The plan must not include more areas on the ANF for wilderness study or remote recreation. Page 3-246 of the DEIS reports there were an estimated 1.63 million site visits to the ANF in 2001 of which only 36,815 were wilderness visits, or only 2%. The “passive value” claim cannot offset the potential social and economic loss incurred to counties, townships, and borough by adding nearly 50,000 acres of wilderness and quasi wilderness. More importantly, wilderness designation is forever, totally withdrawn from the management equation in future planning cycles thereby limiting productive capacity. (#462)

Sample Statement: On the subject of more wilderness, it will not bring any more revenue or more people because most people that come for the wilderness experience camp in the parking lots, hike for a day or two, bring their own food and water, then they pack up and go away and leave nothing for the local economy. With motorized recreation, these people buy local gas, food, and if something breaks down, they go to a local shop and have it fixed. (#251)

Response: The level of economic impact associated with wilderness is subject to substantial debate. Wilderness visitors much like other visitors to National Forests often make contributions to local economies associated with their visitation. This may include purchases of gas for their motor vehicles, supplies, restaurant meals or stays in local lodging before or after visitation. Wilderness areas are established for a variety of other benefits (primarily of non-market values) that are not reflected in economic transactions that contribute to local jobs or income. Although the ANF has not done a specific wilderness versus non-wilderness economic tradeoff analysis, a comparison of economic efficiency measures and economic impact measures provides some insight on the economic tradeoffs between the Alternatives (see FEIS Appendix B, pp. B-78 to B-98).

Public Interest #411: The Final EIS should consider the impacts of the proposed wilderness area recommendations on McKean County and the township of Bradford.

Sample Statement: You should not expand any wilderness designated area. I do not believe that that is economically viable for this area and, more importantly, because that expanded wilderness designation will impact exclusively in the McKean County and almost exclusively Bradford and the Willow Bay area that that is not a fair, balanced approach to the expansion of wilderness designated area. (#381)

Response: The ANF is required to inventory and evaluate areas for wilderness. Two areas (Tracy Ridge and Chestnut Ridge) are within McKean County. See response to PI #410 for a short discussion on the economic impact of wilderness. The ROD (pp. 17 and 18) describes the rationale for the recommendations for each of these areas.

3.15.4 Timber

Note: Also see section 3.6.2 of this Appendix.

Public Interest #412: The Final EIS should explain how present net value was calculated.

Sample Statement: The application of cost figures in Spectrum fails to fulfill the requirements of the NFMA. Factors affecting costs and revenues were left out of the equation. Differences between logging systems were not estimated. The lack of cost differentiation fails to perform one of the central tasks of determining timber suitability under the NFMA. Analysis areas are to be grouped by considering factors that influence costs and returns. These factors include terrain, and access (transportation requirements). Without these cost and revenue differentiations the present net value of each analysis area cannot be determined as is required under the NFMA. Costs must be subtracted from revenues to arrive at present net value (PNV). As long as those costs are not reported or represent only the least expensive cost total (by ignoring factors that drive up costs) the acres of suitable land will be overestimated. The excess of discounted benefits less discounted costs will be larger than it really is. ASQ will also then be overestimated as the number of acres of suitable land will be overestimated. The definition of direct costs at 36 CFR 219.14 (b)(2) is explicit, “direct costs include the anticipated investments, maintenance, operating, management, and planning costs attributable to timber production activities, including mitigation measures necessitated by the impacts of timber production.” Investments and planning costs do not seem to have been addressed either. Mitigation measures also do not seem to have been accounted for in the cost calculations. This cost is especially tied to factors such as slope, proximity to streams, proximity to cultural resources, proximity to threatened and endangered plant and animal habitat, all of which can be stratified. (#443)

Response: FEIS Appendix B, pp. B-78 to B-92 contains added material that describes the calculation of present net value, including a full description of the costs, revenues and non-market values considered. This also includes a specific analysis of each forest type and the relative economic efficiency of timber harvest regimes on each type. Forest types are considered to be the major determinant of variations in economic efficiency affecting harvest opportunities on the ANF. Cost factors such as transportation, logging systems or slope are not major cost differentials in considering economic efficiency on the ANF. The ANF consists of primarily low to moderate slopes that use only ground based skidding, so there is no major differentiation of logging costs. Slopes above 40% were removed as unsuitable from the suitable land base and remaining areas less than 40% slope would be accessible with this ground based equipment. The analysis also discussed the cost of road access which for the ANF is almost totally done through purchaser specified roads that are not a direct cost to the ANF.

Public Interest #413: The Allegheny National Forest should be managed to maximize the economic contribution to benefit the economy, primarily through timber harvest.

Sample Statement: The amount of revenue derived from timber cutting in the Allegheny National Forest has a direct correlation to the amount of revenue derived by local municipalities and school districts from such timber cutting, the amount of jobs within the timber industry, and the overall economic well being of municipalities and school districts in Elk, Forest, McKean, and Warren County...Given the economic benefits that timber harvesting creates for local communities, in order to meet the needs of local communities the preferred alternative must maximize the permissible amount of timber harvesting and the amount of land available for timber management to the greatest extent possible. (#484)

Sample Statement: The Plan should seek to maximize its support for the local communities and the regional economy. This includes working to maximize productivity and sustainable timber harvests...The ANF's influence on the forest products industry also goes well beyond the local region. The black cherry produced in and around the ANF...provides Pennsylvania's primary and secondary wood producers with a competitive advantage over domestic and international competition. Restrictions in access to ANF timber have shown to cause impacts in timber and lumber markets across the state. Timber harvesting also provides the Forest Service with significant revenue, which is shared with local governments in the region. These payments are critical to these local governments and their citizens. (#268)

Sample Statement: Many local industries have left the area over the past several years, and a sufficient number of jobs have not been created to replace the number of jobs eliminated due to the departure of these prominent industries. As a result, an increased number of people have been required to leave the area, thus decreasing the populations in Elk, Forest, McKean, and Warren Counties. In order to reverse this trend, new jobs need to be created so that, as industries leave the area, local residents still have an opportunity to remain. However, the preferred alternative C projects a far less increase in employment (730 jobs) than Alternatives A and B (1,000 jobs). Additionally, a greater labor income is projected for alternatives A and B (\$40 million, an 85.6% increase) than for the preferred alternative C (\$30 million, a 62.6% increase). Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative emphasizes increased employment and labor income to the greatest extent possible. (#75)

Response: These are displayed as statements of opinion. The national forests are managed for a balance of multiple uses and not for the maximization of any single resource or contributions to local economies. The ANF has given serious consideration to potential economic impacts of the Alternatives as described in the Economics section of Chapter 3 of the FEIS. The ROD (pp. 15-32) describes the rationale for choosing Alternative Cm.

Public Interest #414: The Final EIS should include projections of job losses resulting from the lower level of timber harvest.

Sample Statement: [We] recommend an amendment to the Economics section of the Plan to predict potential job losses created by the lower level of timber harvesting on the ANF. [We] believe that long-term restrictions to ANF timber are impacting the economic sustainability of many sawmills in the ANF region. (#268)

Response: For purposes of economic comparison, the FEIS compares the potential of the Alternatives with the average level of ANF activity that has occurred from 2001-2005. As compared to that period, all of the Alternatives have the potential to increase employment as described in the Economics section of Chapter 3 of the FEIS.

Public Interest #415: The Final EIS should not include payments from the Twenty-Five Percent Fund in estimates of benefits to local communities and should detail how the Secure Rural Schools and Community Self Determination Act funds communities and school districts.

Sample Statement: The DEIS Economic Analysis is flawed because it is grossly overestimating the economic benefit to communities due to using estimates based on communities receiving funding under the 25% fund. (#295)

Response: Although all four counties are presently compensated based upon the Secure Rural Schools Act, the 25% fund basis of shared revenues is still available as an option to local governments. The Alternatives are compared on the basis of full funding and implementation. On this basis, the 25% fund would provide far greater payments to local governments than the Secure Rural Schools Act payments. However, if full implementation cannot be achieved, the Secure Rural Schools Act could provide a more stable basis for payments. This was described in the Economics section of Chapter 3 of the DEIS, but some additional material has been added to both this Economics section and the summary of the FEIS.

3.16 Transportation System and Facilities

3.16.1 General

Public Interest #416: The Forest Plan should include provisions for a public transportation system.

Sample Statement: Please consider the addition of a Public Transportation Element to the...PLRMP and DEIS. This element would evaluate current public transportation opportunities/utilization in and around the Allegheny National Forest, study expansion of the regional (Fullington Trailways) and local (Area Transportation Authority and Warren County Transportation Authority) systems to link to the ANF, study the feasibility of the ANF Shuttle within the ANF boundaries. This shuttle would connect to destinations within the ANF Regional and local public transportation system. (#144)

Response: The responsibility for establishing routes for public transportation system providers resides with the respective Transportation Authorities. The ANF works with these authorities thru the Regional Transportation Planning Offices of Pennsylvania to identify potential routes and destinations. Planning for Warren and Forest Counties is conducted by the Northwest Regional Planning Office and planning for Elk and McKean Counties is conducted by the North Central Regional Planning Office. Expansion needs and possibilities of public transportation systems would be identified in each region's Long Range Transportation Plan. This is beyond the scope of the ANF Forest Plan Revision.

3.16.2 Transportation Planning

Public Interest #417: The ANF should describe how and when a transportation planning process will be completed.

Sample Statement: Finally, will the ANF engage in a separate transportation planning process as other national forests will be doing? Or are all applicable road and trail decisions being made at this time for the plan period for the whole forest, negating the need for a separate transportation planning process? If the Forest will engage in a separate process, when can we expect that process to begin? What transportation planning decisions would be deferred or revisited in that process? (#443)

Response: As a result of the Travel Management Rule, the ANF will initiate a separate transportation planning process that will culminate with the release of a Motorized Vehicle Use Map (MVUM) in July 2008. Motorized access alternatives will be analyzed with input from the general public. This decision will be analyzed and updated annually in accordance with 36 CFR 212, 251, 261, and 295. The miles of road and trail indicated in the MVUM are only estimates – site specific analysis will determine the exact mileage and location of these roads and trails.

Public Interest #418: The Final EIS should explain budgeting and planning for the transportation system (i.e., road construction, reconstruction and maintenance).

Sample Statement: The ANF is proposing a very large number of new roads for the next plan period in comparison to other national forests in the region of similar size. This is especially surprising given the already heavily roaded nature of the forest. We question the need for the miles of new roads under each alternative. We encourage the Forest to take advantage of the roads built for oil and gas extraction and to seek ways to avoid having to build this many new miles. What is the current maintenance backlog total on the forest in both miles of roads and projected costs? How does the Forest expect to maintain the current road system and the new miles proposed with shrinking federal budgets? (#443)

Response: The Forestwide Roads Analysis (FWRAP) contains this documentation (FWRAP, 2003 pp. 82-90). New roads are only constructed when existing access needs to be improved. While there are many areas of the forest that are adequately roaded, there are other areas that are included within management areas that will require improved access to meet the objectives of the management area. The LRMP includes a guideline that existing corridors should be utilized over creating new corridors (LRMP p. 42). The ANF timber program can fund necessary road construction, reconstruction and maintenance. OGM developers are responsible for constructing and maintaining the road system commensurate with their use.

Public Interest #419: The Allegheny National Forest should maintain the current percentages of open, closed, and restricted roads on the ANF.

Sample Statement: We believe the percentages of closed, restricted and open should remain as is. How does the Forest propose to pay for additional maintenance and law enforcement costs for the increased miles of open and restricted roads? Your own analysis projects a decrease from the current budget for all years of the plan period for all resource areas except timber. (#443)

Response: Our objective is to maintain the roads needed for public access to the National Forest, so the public can derive the benefit of the Forest. In the absence of funding to perform maintenance and have a safe road for the traveling public, roads will be closed.

The 1986 Forest Plan included an objective for road management of 20% open, 20% restricted and 60% closed. It was recognized at the time that those percentages would not be reached in the first plan cycle. Currently, the percentages are: 36% open, 30% restricted, and 34% closed (FWRAP, 2003 p. 13). For ecosystem health and vegetation management, it is desirable to control the size of the deer herd. The primary method of accomplishing this is by distributing the deer hunters into areas of high deer populations. The forest sees this as a continuing long-term need. Because of the continuing need for access for hunting, it is desirable to provide managers the flexibility to open roads for deer hunting. Based on this need, the percentages of open, restricted and closed for this planning cycle are 33% open, 33% restricted and 34% closed (FEIS p. 3-69). This is close to the current percentages of road management. During site-specific project analysis, management of existing and proposed roads will be analyzed to determine the most advantageous mix for that particular area.

3.16.3 Road Management

Public Interest #420: The Allegheny National Forest should decommission unused, non-system roads at a rate of more than 2 miles per year.

Sample Statement: Pg ES-11, Table ES-2. Road Decommissioning (System) of 2 miles per year is projected. I suggest a target of an additional Non-System Road Decommissioning of 10 miles/year. This is suggested due to the fact that there are many abandoned roads that are either not regenerating into productive timber land and/or are being used illegally by motorized vehicles and eroding causing soil movement and sedimentation of watercourses. (#161)

Sample Statement: I think the Plan should have a higher goal for decommissioning roads. With so many OGM roads being developed, we should be striving to get rid of FS as well as non-system roads that are not being utilized to help lessen the problem of fragmentation of habitats and erosion and sedimentation into streams. In the MA description of remote recreation areas, I believe it talks about decommissioning roads within 5 years. I'm not sure, but it seems like that alone might be over the goal of only doing 2 miles per year. (#162)

Response: OGM roads are the responsibility of the OGM operator to decommission when their use of the road is completed. When the OGM operator determines to curtail operations in an area, they work with the land owner to determine which roads the land owner wants left. The remaining roads are the responsibility of the OGM operator

to decommission (PA DEP – Oil and Gas Operators Manual, 2001 Chapter 4, p. 50). In addition, see standards requiring restoration of OGM development sites (LRMP p. 91).

During project level planning, all roads within a project area are examined to determine opportunities for decommissioning. As opportunities and funding are available, roads will be decommissioned. As roads are identified that are not necessary to meet resource management objectives, they will be closed to traffic.

Public Interest #421: The Allegheny National Forest should develop a construction and maintenance program for the dirt and gravel roads and rock pits to reduce sedimentation of streams.

Sample Statement: We recommend that the Allegheny National Forest develop a construction and maintenance program for the many miles of dirt and gravel roads and rock pits to reduce the amount of sediment that reaches streams and rivers in the region. (#246)

Response: We concur. This is standard operating procedure. The ANF has a construction and maintenance program. Annually the ANF inspects 20% of the maintenance level 3-5 roads. This inspection includes the condition of the surface and ditches and every culvert, sign, turnout and turnaround on the road. This data is inputted into a database called INFRA Travel Routes, from which summary reports can be run. In addition, detailed Aquatic Organism Passage (AOP) surveys are done on all major stream crossings and entered into a database. From these databases, priorities can be developed for eliminating or reducing the critical impacts to safety, soil, water and fisheries.

Prior to project-level analysis, a Roads Analysis is completed that details the condition, benefits and risks of every road within the project area. Within these project areas, inspections are completed on all roads and condition data is inputted into INFRA Travel Routes for FS system roads. This analysis is used as a basis for determining the roads recommended for construction, reconstruction, road management changes, and decommissioning within the project area.

Annually, the FS holds meetings to determine which roads require grading or should be open for hunting. Consideration is given to roads under contract for reconstruction, active timber sales or OGM developments, condition of the roads, past management and NEPA decisions.

For pits, prior to development or expansion, a pit management plan is completed. This plan details the development that can occur, limitations, and reclamation requirements for that specific pit.

Specific to reducing the amount of sediment reaching streams, the ANF was a founding member of the Pennsylvania Dirt and Gravel Roads Task Force. This Task Force examined methods to reduce the amount of sediment reaching streams. The ANF acted as a working laboratory for testing new construction and maintenance methods that were being examined for sediment reduction. The recommendations of this task force have been implemented state-wide. One of the most beneficial recommendations from this task force was the development of a driving surface aggregate (DSA). During initial testing of limestone surfacing, it was determined that the traditional 2A and 2RC aggregate mixtures did not provide a surface that had the maintenance characteristics needed. DSA have additional fines which bind the surface together better and withstand traffic and weather impacts. DSA has been shown to reduce sediment delivery to streams by up to 45% compared to pit run surfacing (FWRAP p. 67). Due to expense, DSA is used primarily at stream crossings. Presently, 72 miles of FS roads have been surfaced with limestone and the Plan includes and objective to surface an additional 5 miles annually with limestone (LRMP p. 21).

Public Interest #422: The Allegheny National Forest should maintain adequate drainage on forest roads to decrease sedimentation and promote road longevity.

Sample Statement: Most of the Forest Service roads I've encountered on the Allegheny National Forest are built from locally mined shale and sandstone. While it is true that use of roads built from this material will, over time, result in the road crumbling into sandy and muddy mush, much of this problem stems from the Forest Service's road-building technique. From the gated Forest Service roads I've hiked on, I've seen poor drainage situations galore. The Allegheny National Forest should have a standing policy on road building and maintenance that the building and maintenance of Forest Service roads requires a long-term responsibility to keep clean and practical drainage ditches so that no water can stand along the roadside. Standing water means the road's integrity is in jeopardy. The only way to rely on a shale or sandstone base is to cover it over with a layer of 2RC and/or 2B gravel. Such a layer, along with adequate attention to drainage, will assure a much better and more durable road. Bare shale/sandstone, along with poor drainage (many Forest Service roads appear to suffer from little or no drainage ditches at all) assure that a road will not have longevity, will not be able to stand up to significant traffic, and will certainly contribute to watershed issues such as siltation and erosion. (#292)

Response: We concur in principle and have been advocating this for all roads in the area. We have been reconstructing our roads to meet the most current BMPs for erosion and sedimentation control, and believe that the standards and guidelines included within the LRMP accomplish this. We are continually searching for new and improved BMPs. See response to PI #421.

On roads that are closed to traffic, it is an accepted practice to reduce the maintenance to minimal levels and defer maintenance activities until the road is needed for access. Typically, these roads are scarified and seeded to reduce sedimentation potential.

Public Interest #423: The Forest Plan should better define the stabilization guideline for road construction.

Sample Statement: We recognize the sensitivity of the landscape to roads and runoff when slopes exceed 8%. We note that the plan states, "Grades up to 20% (are) acceptable for short pitches up to 200 feet when sufficient stabilization is provided." This standard is vague, provides no substantive guidance and requires more detail to be effective. What is sufficient stabilization? (#63)

Response: The guideline has been changed to "Grades up to 15% (are) acceptable for short pitches up to 200 feet when sufficient stabilization is provided." The guideline allows for site specific stabilization measures. See LRMP, Part 3, 2500 Watershed and Air Management, Soils section.

Public Interest #424: The Forest Plan should include a standard for rock pit management.

Sample Statement: We recommend development of a standard for rock pit management. (#246)

Response: See LRMP Part 3, Design Criteria, section 7700 Transportation System, Pit Management, p. 98 for standards.

3.16.4 Facilities

Public Interest #425: The Forest Plan should be revised so that all management areas allow for the construction and placement of communications towers.

Sample Statement: Designating areas as Wilderness Areas, Remote Recreation Areas, Wild and Scenic Areas, or National Recreation Areas precludes the construction of a telecommunications infrastructure in these areas. Currently, 13 of the 15 land use designations do not permit the construction of communications

towers. Given the current inadequacy of telecommunications service in the area and the barriers that the Proposed Plan creates for the construction of a telecommunications infrastructure, a safety issue is present for those individuals who frequent the Allegheny National Forest. Therefore, rather than modifying the Plan at a later date, the Proposed Plan must be rescinded and revised so that all management areas will allow for the construction and placement of communications towers. This will better ensure the safety of those that frequent the Allegheny National Forest and promote increased use and recreational development. (#75)

Response: Towers, access roads, and other various right-of-ways are incompatible with several National Forest management areas. There are 740,643 acres encompassed by the Proclamation Boundary for the Allegheny National Forest of which 29% prohibit communication towers. See p. 37 of the LRMP for suitability designations for communication towers. Currently there are no cellular telephone towers on the Allegheny National Forest, nor are there any requests to construct any.

Public Interest #426: The Forest Service should establish the Forest Supervisor's Office within the boundaries of the ANF.

Sample Statement: I understand that the U.S.D.A. Forest Service is considering the establishment of a new Forest Supervisor's Office, with a view toward keeping it in downtown Warren. While I understand and agree with the merits of this initiative, I feel very strongly that some overriding principles are of paramount importance here: 1. The Forest Supervisor's Office is an important asset to any given national forest. As such, it should be located on national forest land already within the proclamation boundaries. (#292)

Response: The decision on the location of the Forest Supervisors office is an administrative decision. It is not a Forest Plan decision.

Public Interest #427: The Allegheny National Forest should emphasize recycling.

Sample Statement: The Allegheny FS Draft Plan does not emphasize the use of chlorine free, 100% post consumer paper products and it should be leading recycling in the ANF region. (#295)

Response: Recycling and the use of paper products with recycled content is a standard operating procedure. It is not a Forest Plan decision.

3.17 Monitoring

3.17.1 General

Public Interest #428: The Allegheny National Forest should involve the public in implementing monitoring and release to the public an annual monitoring and evaluation report.

Sample Statement: I understand that the Monitoring and Evaluation (M and E) plan will not be developed till the plan is approved. The M and E plan will provide accountability and determine if the S and G's are working as designed.- Will the public have a chance on making input into this M and E plan (public meeting)?- Will some members outside the USFS be asked to participate in monitoring a representative project? (#214)

Sample Statement: It appears that the agency is proposing to remove M and E components and details from the Forest Plan and place them in an as yet unwritten implementation guide outside of the requirements of NEPA or any sort of public review. Monitoring, evaluation and reporting have always been separate activities, but the extent to which they have been separated out in the Forest Plan is a concern. While many monitoring activities will take place on a yearly basis, actual evaluation of the monitoring data will often only

take place every five years...Can the ANF guarantee that an Annual Monitoring and Evaluation Report will be published for public review? Can the public trust that monitoring and evaluation information will be available without having to resort to a Freedom of Information Act (FOIA) request? Can the public trust that the agency is really implementing an adaptive management framework? (#443)

Response: See changes from draft to final LRMP Part 2 Monitoring section (pp. 37-52). The Monitoring and Evaluation requirements have not been removed from the Forest Plan. The monitoring questions contained in the LRMP Monitoring Tables 13 to 15 show what will be monitored. Trends for a number of the measures have been established by past monitoring. New additions within the LRMP will take time to evaluate trends, but the interdisciplinary development of each report will contain feedback recommendations to the Forest Supervisor and fulfill the adaptive management role when needed. An annual monitoring report will be produced and shared with the public.

The detailed implementation guide for monitoring will be produced after the ROD is signed. At that time public participation in monitoring projects will be identified.

3.17.2 OGM Development

Public Interest #429: The Forest Plan should include monitoring objectives for OGM development.

Sample Statement: The “Analysis of the Need for Change in Forest Plan Revision” recommended a more definitive means of measuring oil and gas development. To that end, we propose the following Plan Objective: Collect and maintain up-to-date detailed information on all oil and gas development in the Forest in order to properly measure and monitor it. Our proposal would involve establishing a database of mineral ownership in the ANF and quantitative information such as acres under production, miles of roads built, number of wells by type, active versus inactive wells, the number and rate of inactive well plugging, and other information that will help the Forest Supervisor monitor and plan for oil and gas development in the Forest. (#327)

Response: We have added an objective to establish an inventory of oil and gas development on the ANF. Monitoring of these objectives is contained in the monitoring plan. See LRMP p. 48 for OGM Monitoring.

3.17.3 Vegetation and Habitat

Public Interest #430: The Allegheny National Forest should measure the quality of wildlife and sensitive plant species habitat diversity by monitoring configuration, structure, and proximity of forest types and age classes.

Sample Statement: The proportion and number of acres in various age classes and forest types (as measured in the proposed Monitoring Plan) represent an important component when measuring habitat diversity. However, current research in wildlife-landscape relationships reveals configuration, structure, and proximity of forest types/age classes are important components that ultimately determine habitat quality. These spatial features are easily quantified with GIS and should be used to monitor wildlife, fish, and sensitive plant habitat. The “Monitoring Questions” to address these parameters include: Are forest types and age classes adequately interspersed to provide quality habitat? Are patch size and configuration adequate to provide quality habitat? Numerous wildlife studies can provide baseline information to compare results on ANF and answer these questions. (#87)

Response: Vegetation monitoring is an important part of wildlife monitoring. Monitoring identified on pp. 38-52 of the LRMP includes a number of items that will require monitoring of the structure and spatial components of

vegetation, which will be used to evaluate the quality of wildlife habitat as suggested. See also response to PI #437.

Public Interest #431: The Forest Plan should utilize monitoring and a prioritization methodology to dictate vegetation management.

Sample Statement: The forest management section of the plan must consider the present forest structure, the desired future condition, and the time it will take to get there. This includes the current standing inventory, species composition, the size class make-up, the age class make-up, the growth rate, and the biological limitations of the species. All tools must be available to the manager so he can react quickly to changing conditions including inevitable natural catastrophes. The acres treated annually must be monitored and adjusted so the plan will stay on track. Emphasis should be on acres treated and forest health, not diverted to tangential debates. The plan and methodologies employed need monitored and reviewed every five years so adjustments can be made. A prioritization methodology needs added to the plan that will aid the managers in determining where to manage forest. This will help maximize efficiencies in getting the most bang for the buck in tight budget constraints. (#163)

Response: See the discussion in the “Monitoring of the Strategy” section of Part 3 of the LRMP. The monitoring tables do reflect monitoring of the items you have mentioned, with an evaluation generally every five years to determine any management changes needed. Annual work prioritization would be based on monitoring/evaluation results, annual budget direction, Forest Plan direction, and forest health conditions at the time. In addition, see response to PI #17.

Public Interest #432: The Forest Plan should include a requirement to monitor the oak and aspen forest types.

Sample Statement: Assess every five years the distribution of forest types to ascertain losses/gains in oak and aspen forest types. The early-structural and 0-20 year age classes should be monitored. (#216)

Response: LRMP Tables 14 (p. 45) and 15 (p. 50) contain a monitoring question regarding oak. LRMP Table 15 (p. 50) contains a monitoring question regarding forest composition that would include monitoring a broad range of forest types, including aspen. Note that the LRMP contains an objective to maintain aspen (LRMP p. 19). In addition, see response to PI #431.

Public Interest #433: The Forest Plan should include a provision to monitor uneven-aged management that allows reversion to even-aged management.

Sample Statement: Amend the Plan to include monitoring and a scheduled mid-point review of the utilization of uneven-aged management. Allow for a mid-plan revision (a reversion to an even-aged management protocol) if it is determined that the uneven-aged management is again unsuccessful at achieving desired forest regeneration results. (#268)

Response: The LRMP (LRMP Part 2, Table 15, p. 50) provides for monitoring reforestation success for both even-aged and uneven-aged management. Note that it calls for annual monitoring with an evaluation every fifth year of the data collected. The introduction to the monitoring section (LRMP pp. 37 and 38) specifically mentions that the “results of monitoring and evaluation can ultimately lead to a change in Forest Plan direction”. We have retained several small Management Area 2.1 units in Alternative Cm because we feel it is important to continue to implement and monitor uneven-aged treatments that have been started during the last 20 years, to evaluate their effectiveness, and to try to refine treatments in order to improve their effectiveness. We also believe there is substantial public interest in uneven-aged management.

3.17.4 Non-Native Invasive Species (NNIS)

Public Interest #434: The Allegheny National Forest should evaluate NNIS treatments annually and measure effectiveness of treatments.

Sample Statement: Page II-28, Section 2080 Noxious Weed Management. For the Objective “Complete 500 to 2,500 acres of invasive plant treatment”, I would recommend that the Monitoring Question be changed to add some measure of the effectiveness of the treatment and what would constitute successful treatment. I believe that simply completing the treatment is not a worthwhile goal if the treatment is ineffective. I would also recommend that the Evaluation Frequency be annually instead of every fifth year so that changes to the treatment program could be made more quickly if needed. (#235)

Response: Effectiveness monitoring of NNIS treatments occurs annually as part of NNIS program.

3.17.5 Management Indicator Species

Public Interest #435: The Forest Plan should designate and monitor additional management indicator species.

DEER

Sample Statement: The DEIS dramatically reduces the number of MIS species for the ANF to four: the timber rattlesnake, northern goshawk, cerulean warbler and “aquatic invertebrate diversity”. That is far too few to satisfy the regulatory rationale for designating MIS species. While those four MIS may allow the Forest Service to evaluate the impacts of their management on certain forest types (for example oak and certain mature forests) those species will offer very little information regarding the impacts of other activities or identified issues regarding forest health. At a minimum, the white tailed deer should have been retained as an MIS. The DEIS notes repeatedly how controlling deer populations is central to many forest health issues. While the Forest Service's activities are not solely responsible for or capable of controlling deer populations, it would seem very apparent that the Forest Service needs current and accurate information regarding deer populations and population trends in order to have any hope of accurately evaluating the current state of the ANF. (#327)

BEECH AND HEMLOCK

Sample Statement: The DEIS should have also identified MIS that reflect how the forest health issues impacting beech and possibly hemlock, and Forest Service management designed to respond to those issues, will impact forest and wildlife diversity. Again this is a serious forest health issue and the Forest Service should want to know how any decline in these species is impacting other plant and animal species. (#327)

ALLEGHENY HARDWOOD

Sample Statement: The Forest Service proposes to create and maintain a substantial amount of forest dominated by Allegheny Hardwoods. Why are there no MIS designated to evaluate the impacts of this management on other plant and animal species? This omission seems especially glaring in light of the large amount of “management” that is contemplated to create or maintain this forest type. (#327)

EARLY STRUCTURAL HABITAT

Sample Statement: We're very disappointed that, given the vast amount of time and effort and resources towards species are concerned related to late structural forest, that there were no species concerned in the plan that really measured the capacity or capability of early structural forest, and we would make a recommendation that that be added with the added emphasis of early structural forest. (#352)

RIPARIAN AREAS

Sample Statement: Riparian areas extend well into the plateaus on the ANF. Amphibians are very sensitive to change in micro-sites. Select an appropriate amphibian to use as an indicator of riparian health. (#214)

Response: The need for an additional MIS was recognized and the mourning warbler was added as an early structural indicator in the FEIS (pp. 3-195, 3-202, and 3-203). While the respondents suggest that more MIS are needed to adequately monitor habitat and forest health, the management indicator species approach is not the only monitoring tool used by the ANF and the LRMP includes a comprehensive monitoring strategy to assess short and long-term changes in habitat (pp. 43-57). For example, the respondent suggests that deer need to be included as an MIS to adequately monitor changes in forest health. However, deer affect forest health by modifying vegetation and changes in vegetation will be monitored through the use of forest health plots. Because the monitoring plots will assess changes in vegetation, as well as a variety of other influences, they will provide a more comprehensive evaluation of the factors and we do not need to have deer as a MIS to assess changes in forest health. Similarly, it is suggested that we need to have additional MIS in order to assess riparian health and specific forest types such as Allegheny hardwood, beech and hemlock. However, forest health plots will provide comprehensive information related to forest vegetation. Many of the forest health plots will occur within riparian areas and will provide information on vegetation, disturbance processes, soils and ozone bio-indicators. As a result, adequate monitoring is already in place (LRMP pp. 37-52) and it is not necessary to add additional MIS to assess the suggested communities or address the forest health issue.

Public Interest #436: The Allegheny National Forest should use brook trout recovery as an indicator of ecosystem health.

Sample Statement: Brook trout recovery might become ...an indicator of ecosystem health. This is directly a monitor of sediment and the impact of your many roads. (#20)

Response: The ANF decided to monitor the health of streams by using aquatic macroinvertebrates as a Management Indicator Species (LRMP Table 13, p. 41). The species composition of aquatic macroinvertebrates may be used to assess the health of streams due to their sensitivity to changes in environmental conditions. While brook trout are not specifically addressed as a species to monitor, surveys are conducted annually on the Forest to assess their populations in a variety of streams.

Public Interest #437: The Allegheny National Forest should monitor management indicator species by population counts.

Sample Statement: As for the supposedly mandatory monitoring provisions regarding MIS species (see Table II-13) there is absolutely nothing specific that seems to be required. There is simply a vague reference to what is designated as "class B" methods. This is very odd and illegal in at least two respects. First of all, the Forest Service is required to provide a much more concrete and specific monitoring plan for MIS species. Even if the Forest Service intends to rely on habitat monitoring as opposed to monitoring the actual populations of these species (as it insists that it can do; see PLRMP at 4) it must at least describe what habitat it will be monitoring for these species. Perhaps more importantly, the PLRMP provisions and their description as Class B methods, seems to be fundamentally inconsistent with the much more specific, and apparently more reliable methods for monitoring these MIS that are set out in the DEIS (Table 3-45). So what is the

Forest Service going to do, what the DEIS says is necessary - in-the-field examination and counting that can be used for statistical analysis - or what the PLRMP vaguely refers to as Class B “informal assessments” that cannot be used for such analysis? The DEIS monitoring would seem to be required by the applicable regulations (see e.g. section 219.19) but those methods are not mentioned or made mandatory by the PLRMP. The PLRMP thus improperly and illegally avoids rigorous, mandatory monitoring for every single animal species in the ANF (#327)

Response: Management indicator species are monitored through a combination of habitat monitoring, monitoring of individual species and projecting changes in populations (FEIS pp. 3-195, LRMP pp. 39-41). While the respondent suggests that the level of monitoring proposed in the LRMP is inadequate, it does provide sufficient information for the initial elements of a monitoring strategy. Specific protocols and monitoring techniques that will be utilized will be spelled out in detail in the forestwide monitoring guide, which will be developed at a later date. In addition, see response to PI #428.

3.17.6 Species with Viability Concerns

Public Interest #438: The Forest Plan should better define the monitoring objectives of species with viability concerns and make monitoring mandatory.

Sample Statement: The DEIS analysis also claims that specific monitoring requirements for each species of concern were identified. If the DEIS is referring to Table II-14 in the PLRMP, that is hardly sufficient. All of these monitoring objectives regarding species with viability concerns are extremely vague and more importantly, the PLRMP goes out of its way to explain that all of these “objectives” are non-mandatory. How is this non-mandatory monitoring consistent with the mandatory viability requirement? Is making such monitoring non-mandatory the direct result of sharply reducing the number of MIS species, whose monitoring is mandatory? All of this seems to fall far short of the minimum efforts that should be made, consistent with the mandatory viability requirement that applies to all native species and the Forest Service's obligation to monitor how its management practices are impacting ANF wildlife. (#327)

Response: Forest Plan monitoring, including that necessary to monitor species with viability concerns is summarized on pp. 37-52 of the LRMP. Although it is not necessary to monitor every species with viability concerns, the individual species, habitat and MIS monitoring proposed will be adequate to assess species viability, as well as assess the effects of management actions. While many of the specific monitoring protocols and techniques are not presented in the LRMP, these will be included in the monitoring guide which will be completed at a later date. In addition, see response to PI #428.

Public Interest #439: The Forest Plan should require actual population surveys to monitor species with viability concerns.

Sample Statement: The new ANF Forest Plan must require the Forest Service to have actual population counting of species to determine viability. (#295)

Response: Many species have viability concerns due to their low, infrequent occurrence on the ANF and some species such as the yellow-bellied flycatcher (Biological Evaluation pp. 162 and 163) are considered extremely rare on the ANF. As a result, it is not possible to “count” these rare species as suggested and the strategy used to ensure viability includes a combination of 1) protection of occupied habitat, which includes counting individuals and assessing reproduction, 2) protection and maintenance of suitable habitat through design criteria and Forest goals and objectives, 3) enhancement of habitat for some species through management (e.g. northern flying squirrel) 4) monitoring effects to and the availability of suitable habitat and 5) species monitoring. As discussed in the FEIS, collectively through these actions, the ANF ensures that viable populations of all species are maintained (FEIS pp. 3-233, 3-239, 3-243, 3-245, 3-246, 3-270, 3-272 and 3-278).

3.17.7 Social and Economic Issues

Public Interest #440: The Forest Plan should be monitored to ensure that local economies and community stability are adequately protected.

Sample Statement: 36 C.F.R. section 219.6 requires that monitoring programs be implemented to determine how the land use plans are affecting local economies and communities that are dependent on the Allegheny National Forest. The monitoring programs are designed to determine whether local economies and community stability are adequately being protected through the planning process and whether the intent of National Forest establishment legislation is being carried out. To our knowledge, no such monitoring plan or a codified communications protocol regarding the monitoring plan exists. (#484)

Response: Among the items identified in table 13 of the Minimum Legally Required Monitoring Items (LRMP p. 41) is an item for monitoring effects of the ANF on local communities. Monitoring of effects of national forest management on communities near the ANF is done to develop an understanding of how local communities are being affected by the activities of the ANF.

4.0 Comment Letters Received from Government Entities

This section reproduces comment letters on the PLRMP and DEIS from government entities in their entirety (FSH 1909.15.24.13). This section only contains those comment letters that were submitted during the formal PLRMP/DEIS comment period (May 26, 2006 to August 28, 2006). Comment letters received from government entities are represented in the Public Concern statements and the ANF response may be found in Section 3 of this Appendix. Table A1 shows the list of letters received from government entities and the Allegheny letter number they are filed under at the Forest Headquarters office in Warren, PA.

Some government entities made identical comments drawn from a resolution and a 23 point letter. These entities are listed in Table A2 (p. A-327). The resolution and 23 point letter are not individually reproduced for each entity listed in Table A2 in order to avoid duplication. Instances in which an entity listed in Table A2 used less than the entire 23 point letter are noted in Table A2. If an entity listed in Table A2 submitted additional material besides the 23 point letter or resolution, then that additional material is reproduced in this section in its entirety.

The comment letters are reproduced in this section in the order that they are listed in Table A1. The 23 point letter (p. A-328) and resolution (p. A-339) are included at the end of this section.

Table A-1. Government Entities that submitted comment letters on the PLRMP and DEIS.

Organization	ANF Letter Number(s)	Page Number
Federal Agencies		
United States Department of Interior – Office of the Secretary	159	A-229
United States Department of Interior – National Park Service	221	A-234
United States Environmental Protection Agency	231	A-237
Federal Elected Officials		
US House of Representatives – John E. Peterson	158 and 321	A-241 and A-244
Tribal Officials		
Seneca Nation Tribal Historic Preservation	503	A-245
State Agencies		
Pennsylvania Fish and Boat Commission	62 and 63	A-261 and A-264
Pennsylvania Game Commission	87	A-268
Pennsylvania Department of Conservation and Natural Resources	246	A-272
County Officials		
McKean County Board of Commissioners	201	A-277
McKean County Planning Commission	203	A-281
Warren County Board of Commissioners	333	A-284
Smethport Area School District	469*	*
Bradford Area School District	475*	*

Organization	ANF Letter Number(s)	Page Number
Forest Area School District	482*	*
Ridgway Area School District	496*	*
Warren Area School District	499*	*
Kane Area School District	502*	*
Township Officials		
Heath Township Board	04	A-313
Millcreek Township Planning Commission	19	A-314
Mead Township Board	89*	*
Columbus Township Board	225*	*
Jones Township Board	245*	*
Elk Township Board	279* and 493*	*
Freehold Township Board	280*	*
Glade Township Board	477	A-316
Howe Township Board	481*	*
Sheffield Township Board	485*	*
Brokenstraw Township Board	486*	*
Farmington Township Board	489*	*
Cherry Grove Township Board	491*	*
Pine Grove Township Board	492*	*
Pleasant Township Board	494*	*
Corydon Township Board	495*	*
Ridgway Township Board	497*	*
Watson Township Board	498*	*
Eldred Township Board	500*	*
City Officials		
Kane Mayor	145	A-318
City of Bradford Office of Economic and Community Development	202	A-320
City of Bradford	490*	A-323*
Borough Officials		
Tionesta Borough Council	75*	*
Ridgway Borough Council	487*	A-326*
Clarendon Borough Council	488*	*

*See Table A-2.



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904



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August 23, 2006

ER06/487

William Connelly
Planning Officer
U.S. Forest Service
Allegheny National Forest
(ATTN: Forest Plan Revision Comments)
P.O. Box 36
Warren, PA 16701

Dear Mr. Connelly:

The Department of the Interior (Department) has reviewed the *Allegheny National Forest Draft Environmental Impact Statement (DEIS)* and *Proposed Land and Resource Management Plan (LRMP)*, dated May, 2006, for the Allegheny National Forest (ANF) located in northwestern Pennsylvania. Please consider these comments carefully before proceeding to a final Environmental Impact Statement.

GENERAL COMMENTS

The DEIS and LRMP do not adequately identify the effects of the various alternatives on fish and wildlife resources within the boundaries of the Allegheny National Forest. Of particular concern are the possible effects of the preferred alternative (Alternative C) on endangered species, aquatic resources, and forest interior bird species, none of which are adequately addressed in the DEIS or the LRMP.

SPECIFIC COMMENTS

Page 3-42 of the DEIS, Cumulative Effects, Roads: Sedimentation can cause long-term damage to aquatic life. We recommend that the Forest Service require oil and gas operators to build and maintain roads, well pads, pipelines, and other related features, to Forest Service standards.

Endangered Species Act Comments

Under Section 7(a)(1) of the Endangered Species Act, government agencies shall utilize their programs to further the conservation and recovery of threatened and endangered species. Efforts to accomplish this goal were not included in the LRMP. We recommend that the Forest Service find the best conservation and recovery measures for listed species on the ANF and evaluate how they can integrate these goals into the LRMP.

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Of the four alternatives evaluated, Alternative D would provide the greatest benefits to listed and candidate species occurring on the ANF; through increased protection of riparian corridors and late successional forest. Consequently, the Department recommends selection of Alternative D as the preferred alternative.

Additional Endangered Species Act comments will be sent under separate cover, since Section 7 consultation between the Forest Service and the Fish and Wildlife Service is currently ongoing.

Fish and Wildlife Coordination Act Comments

Protection of Aquatic Resources

The DEIS and LRMP should identify protective measures by which all activities on the ANF will leave streams and wetlands in their natural state, and incorporate best management practices to control erosion and sedimentation. We recommend the following measures to reduce development impacts on important aquatic habitats, and prevent downstream flooding and water quality degradation:

1. Maintain a minimum 150-foot buffer around all aquatic areas, including streams (ephemeral, intermittent and perennial), wetlands, and vernal pools. To maximize the value of these buffers to wildlife and aquatic life, we recommend that the Forest Service prohibit mowing, removal of vegetation, filling, culverting, and timber harvesting within the boundaries of the buffers.
2. Where re-vegetation is required, only native species should be used.
3. For unavoidable crossings of any streams determined to be perennial or intermittent (as defined in Chapter 89 of the Pennsylvania Code), use only open-bottom arches or bridges, instead of conventional culverts, to enable free movement of wildlife (aquatic and terrestrial) throughout the stream corridor. If the use of conventional culverts cannot be avoided on perennial and intermittent streams, the culvert inverts should be countersunk six inches to allow for formation of a natural stream bottom.
4. If the use of culverts or bridges is not feasible on ephemeral streams, stabilize the streams at stream crossings by installing hardened surfaces (*i.e.*, countersinking hog slats or R4 rock) at crossing points, to minimize vehicular disturbance and erosion. Countersinking these structures will allow continued up and downstream movement of aquatic wildlife.

Use of Herbicides

The DEIS describes the use of herbicides as a forest management tool. Glyphosate (the common ingredient found in Roundup®) and sulfometuron methyl (common Oust®) are two herbicides under consideration.

It is important to consider effects on the aquatic community when spraying herbicides in the vicinity of a water body. Due to the toxic nature of carriers or surfactants usually used in conjunction with herbicides, we recommend these compounds not be used with either herbicide choice. Surfactants, or carriers, can be more toxic and persistent in the environment than the herbicide itself, and may have adverse indirect effects on aquatic life. Oust® has limited use on or near aquatic areas, due to its potential toxicity to fish and potential for water contamination. We recommend that the Forest Service use the aquatic formulation of any herbicide chosen when

herbicide use is anticipated around streams or wetlands. The aquatic formulations of glyphosate (Rodeo®), or triclopyr (Renovate 3®) are acceptable, less toxic alternatives, and recommended for use around aquatic areas.

To avoid incidental spray drift during application of herbicides, we recommend targeted application, including painting the surfaces of freshly cut stumps and stubs, injecting through the bark of woody plants, making cuts with a hatchet and treating, girdling and treating, or basal bark and stem treatment methods, wherever possible.

Evaluation of Proposed Alternatives

The Forest Service has chosen Alternative C, which will provide for a mix of forest conditions including young, intermediate, and older forests; optimal rotations for productivity through mostly even-aged management; and some older forest “core areas” linked through Management Area 2.2, Late Structural Linkages. While Alternative C will provide more habitat value over the No Action (Alternative A) alternative, Alternative D would provide increased amounts of quality wildlife habitat through larger forest “core areas” of wilderness, older-growth forests, and remote recreation areas connected via a larger Management Area 2.2, Late Structural Linkages. Alternative D is also the only proposed alternative which would result in significant areas of uneven-aged forest management (Management Area 2.1). Uneven-aged management leaves larger, older trees in the stand after harvesting which would benefit several species of forest interior migratory birds, as well as the federally listed, endangered Indiana bat.

If the timbering plan of Alternative C were fully implemented, areas of mature and recovering forests would be permanently opened. This expanse of developed land would prevent wildlife from moving to adjacent habitats; reduce the value of adjacent habitat for species having specialized habitat requirements; facilitate the movement of invasive exotic and parasitic species into the area; shift species diversity and composition to a smaller number of habitat generalists; increase competition for food, cover, and breeding sites in adjacent habitats that are already at optimum carrying capacity; and increase predation.

These effects would be particularly acute for migratory birds. Forest fragmentation has been shown to cause significant declines in forest interior, neotropical migratory bird populations. The proposed timber harvest rotation would increase edge habitat and reduce forest block size, thereby enhancing access for common nest predators and habitat generalists such as crows, grackles, blue jays, house sparrows, raccoons, striped skunks, and opossums, which prey upon eggs and young of forest interior breeding birds, and displace the more diverse assemblage of habitat specialists that previously existed in the larger forest tracts. In addition, timber harvesting activities would impede the daily and seasonal movement of animals between various habitat types, and promote the decline of species that are less tolerant of disturbance. An operation of this size would present a formidable barrier for less mobile wildlife, especially smaller and slower-moving animals such as reptiles, amphibians, and small mammals. Alternative D, however, proposes to designate more wilderness/wilderness study areas and remote recreation areas, as well as manage for intermediate and late structural forest habitat which would decrease forest fragmentation and its associated adverse impacts to wildlife.

Moreover, there are likely secondary or indirect adverse environmental effects beyond those associated with habitat loss or degradation, including increased runoff; stream erosion and sedimentation; and non-point source pollution. Overall, the proposed timber harvesting scheme of Alternative C would contribute to the continuing loss of forest interior habitat in this region of

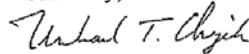
Pennsylvania. One of the most important aspects of Alternative D for wildlife habitat and aquatic resources protection is a larger Management Area 2.2 linking larger “core areas” of contiguous forest. The corridor is proposed mainly along riparian areas, which would protect aquatic resources. The corridor should be adequately sized to provide enough interior forest habitat (discounting the area affected by edge) to be useful to forest interior species, such as many neotropical migratory birds. Also, by connecting large tracts of contiguous forest, interior dwelling species will be able to move through the Allegheny National Forest, increasing gene flow and biodiversity.

SUMMARY COMMENTS

The Department recommends that Alternative D be chosen as the preferred alternative. The larger Management Area 2.2, Late Structural Linkages, focus on uneven-aged management, and designated wilderness/wilderness study and remote recreation areas proposed in Alternative D would provide greater protection for aquatic resources, increase interior forest habitat linkages, decrease habitat fragmentation, and increase currently limited old-growth and late-successional habitat on the forest.

Thank you for the opportunity to review and comment on the DEIS and LRMP. If you have any questions regarding our response, or if you need additional information, please contact the Field Supervisor, U.S. Fish and Wildlife Service’s Pennsylvania Field Office at 814-234-4090.

Sincerely,



Michael T. Chezik
Regional Environmental Officer

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cc:
PGC: Mr. Bill Capouillez
Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

PA DEP Mr. Patrick Williams
PA Department of
Environmental Protection
Northwest Regional Office
230 Chestnut Street
Meadville, PA 16335-3481

USACE: Colonel Steven L. Hill
Pittsburgh District, Regulatory Branch
William S. Moorhead Federal Building
1000 Liberty Ave.
Pittsburgh, PA 15222-4186Pittsburgh

P FBC: Mr. John Arway
Pennsylvania Fish and Boat Commission
450 Robinson Lane
Bellefonte, PA 16823

USFWS: Mr. David Densmore
(Attn: Jennifer Dombroskie)
U.S. Fish and Wildlife Service
Pennsylvania Field Office
315 S. Allen St. Suite 322
State College, PA 16801

L7619(NOCO)
Allegheny NF

August 28, 2006

William Connelly, Planning Officer
Allegheny National Forest
Supervisor's Office
222 Liberty Street
Warren, Pennsylvania 16365

Dear Mr. Connelly,

We appreciate the time and effort required to prepare the Land Resource Management Plan (LRMP) and Draft Environmental Impact Statement (DEIS) for the Allegheny National Forest and thank you and your staff for your work to produce these documents. As the administrators of the North Country National Scenic Trail (NST), we especially appreciate your efforts in planning for the future of the trail on the Allegheny National Forest.

The North Country NST has 97 miles of existing foot trail in the Allegheny National Forest and the Forest has always been an excellent partner in the stewardship of the North Country NST. In general, we believe the proposed LRMP will continue to promote the North Country NST as a premier hiking trail that is used primarily for hiking and back packing. We are especially grateful that you make it clear that the trail is to be managed for foot travel only, thus implementing the Desired Future Condition statement for the trail adopted by our two agencies in 1998.

We would recommend that the Forest incorporate the principles and standards from the *North Country Trail Handbook for Trail Design, Construction, and Maintenance* when managing the trail. This is especially important in regards to signing and marking of the trail, since standard marking of the trail is critical in establishing a consistent identity for the trail across its 4,000+ mile length. Currently, the North Country NST is marked in the Forest with nail-up blue diamonds while the National Standard for the trail is blue paint blazes. North Country Trail Association volunteers would be happy to assist in making this change on the Forest.

As you know the North Country NST intersects the proposed wilderness study areas of Tracy Ridge, Chestnut Ridge, and Minister Valley. Currently there are approximately 8 miles of trail within the proposed Tracy Ridge and Chestnut Ridge wilderness study areas and about 5 miles of within the proposed Minister Valley wilderness study area. Maintaining this trail in a usable condition is critical to the purpose of the North Country NST.

We believe the North Country Trail is compatible with wilderness, and that wilderness adds to the richness of the North Country Trail experience. We also understand that managing wilderness requires different management techniques and rules. We are, however, concerned about the ability to provide appropriate signs and blazing within wilderness.

The LMRP states that trail signing in areas designated as wilderness would have to be “removed or replaced.” We can live with the idea of replacing current standard signing with those that are more compatible with wilderness designation; we would be strongly opposed to wholesale removal of North Country Trail signs and markings from areas designated as wilderness. To this end, we would like to request and believe it essential that you add specific language on the types of signing allowed within wilderness. For example **EM-7100-15** *Sign and Poster Guidelines for the Forest Service*, pages 5-23 and 5-24, provides specific guidance for marking National Scenic Trails within wilderness and primitive areas. This guidance includes allowing limited use of cut/painted blazes as well as the branded or routed logo of the North Country Trail within wilderness areas. We know that North Country NST branding irons have been used in the past: when our Comprehensive Management Plan was published in 1982, the Eastern Region office of the Forest Service purchased such branding irons for each National Forest through which the trail passes.

We feel so strongly about the importance of maintaining a continuity of signing and marking along the North Country NST that we would find it necessary to oppose wilderness designations along the trail if a compatible marking scheme could not be supported and implemented. Since existing Forest Service guidance allows marking within wilderness when a National Standard exists, we see no reason not to include this specification, and specify that paint blazes are appropriate throughout the forest, in the LMRP to provide guidance to those who manage the trail and forest today and in the future.

We are also concerned with the impacts that the proposed Westline Intensive Use Area (IUA) would have on the trail. This IUA would encompass a section of the North Country NST near its crossing at Pennsylvania Route 321. Because of the proximity of this IUA to the North Country NST and the quiet recreation that its users enjoy, the National Park Service recommends that this particular IUA not be pursued or developed.

One additional point—in Appendix C, page 60, you state that “the use of non-motorized and non-mechanical transport of supplies and personnel would **not** be allowed” Is this correct? If so how would the trails be maintained or constructed? Did you intend to say, “The use of motorized and mechanical transport of supplies and personnel would not be allowed”? This wording appears in other places as well:

This RA has fairly extensive trail development and contains managed dispersed campsites, primarily on the exterior fringe along FR 116. Along the Minister Valley Loop Trail, there is a popular scenic overlook. Maintenance of the trail and overlook has included the use of mechanized equipment and vehicular access along FR 537 (0.7 miles). Trails are allowed in wilderness as long as they are constructed and maintained to wilderness standards. The use of non-motorized equipment and non-mechanical transport of supplies and personnel would not be allowed to construct or maintain existing or potential new trails. Trail directional signing and marking would also conform to wilderness sign standards.

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Allegheny National Forest Draft Environmental Impact Statement

Thank you again for your work on the LRMP and DEIS and your continued support of the North Country NST. If you have any additional questions, please feel free to contact North Country

3 221

NST Manager Fred Szarka or Land Protection Coordinator Ken Howell at 608-441-5610, or by e-mail at fredrick_szarka@nps.gov or ken_howell@nps.gov.

Sincerely,

Thomas L. Gilbert
Superintendent

Cc:
Nick Chevance
Regional Environmental Coordinator
Midwest Region
National Park Service
601 Riverfront Drive
Omaha, NE 68102

Clare Cain
Director of Trail Management
North Country Trail Association
229 East Main Street
Lowell, MI 49331

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P.02/05



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August, 28, 2006

Allegheny National Forest
Attn: Forest Plan Revision Comments
PO Box 36
Warren, PA 16365

Re: Draft Environmental Impact Statement to Accompany the Proposed Land and Resource Management Plan, Allegheny National Forest, Elk, Forest, McKean, and Warren Counties, PA
May 2006 CEQ #20060205

Dear Sir:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act the United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. Based on our review of the DEIS, EPA has rated the environmental impacts of the preferred alternative as "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information). A copy of EPA's ranking system is enclosed for your reference. The basis for this rating is contained in the remainder of this letter and in the attached detailed comments.

Project Description:

The Allegheny National Forest was established in 1923 and is approximately 513,325 acres. There are 201 miles of hiking trails, 53 miles of cross country skiing trails, 106 miles of AT V trails, 366 miles of snow mobile loop. In addition there are 1,270 miles of Forest Service roads, 281 miles of state or township roads, and 1,236 miles of oil, gas, and mineral roads (not managed by FS). Ninety-three percent of the mineral rights are owned by non-federal entities. There are about 7,000 oil and gas wells, which use approximately 50,000 acres of the ANF.

The Allegheny National Forest (ANF) proposes to revise its Land and Resource Management Plan as required by the National Forest Management Act (NFMA) of 1976. The current Land and Resource Management Plan (1986 Forest Plan) was approved in 1986 and has been amended 14 times to incorporate new information and to address changed conditions. This DEIS describes four alternatives for revising the 1986 Forest plan. The year 2020 is referred to as the end of this planning period.

An interdisciplinary team identified three major areas of the 1986 Forest Plan that needed change to address preliminary issues: Vegetative management need for change, habitat diversity

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need for change, recreation and special area designation need for change. Vegetative Management involves maintaining healthy forest conditions capable of providing sustainable levels of forest products. It includes maintaining a diversity of tree species and age classes, addressing forest health, reforestation techniques, and the silvicultural system used. Habitat diversity is primarily concerned with maintaining viability of native and desired species, ecosystem and species diversity, and habitat connectivity. Recreation involves provision of an appropriate array of recreational opportunities for the public.

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The team also identified a need to clarify and strengthen guidance in the Forest Plan for seven other resource areas, in order to bring the new Forest Plan into alignment with the 2004-2008 Forest Service Strategic Plan. These include: soil and water quality, heritage resources, scenery, transportation systems, monitoring, management areas, reorganization of Forest Plan Format.

Alternatives:

Four alternatives are analyzed in detail in the DEIS. The following elements are common to all alternatives: white-tailed deer are managed to densities that range between 10 and 20 deer per square mile, trail management for all uses except ATV/OHM and equestrian use, forest health treatments for insects and disease, management of oil and gas development, all areas with special designation under the 1986 Forest Plan continues to be protected.

Alternative A ("No Action") includes: Five intensive use areas (IUAs) for ATV/OHM use on designated trails, open riding across the Forest for equestrians, few areas for semi-primitive, non-motorized recreation, current direction for protection of riparian areas and threatened, endangered, and sensitive species.

Alternatives B, C, and D have the following features in common: updated standards and guidelines for herbicide application, updated standards and guidelines for habitat protection of threatened and endangered species, and species with viability concerns, objectives, standards, and guidelines for greater protection of riparian corridors, adjustment to MA 7.1 to provide developed recreation with considerable facilities, provisions of MA 8.11 for management of recreation and scenic river segments of Wild and Scenic Rivers, recommendation for expansion of Kane experimental Forest, recommendation of Buckaloons as a designated historic area, all previously identified RARE II areas do not allow scheduled timber production and new Forest Service road construction.

Alternative B includes: greatest level of early structural habitat conditions, Clarion River area managed for remote recreation, Minister Valley area managed for interpretive recreation, no recommendations for additional wilderness study areas, five IUAs for ATV/OHM use on designated trails, four EUAs where equestrian use is limited to designated trails, but open riding is permitted on most of the rest of the forest.

Alternative C (preferred alternative) includes: recommendation for two wilderness study areas (Tracy Ridge and Chestnut Ridge) totaling more than 14,000 acres, Four remote recreation areas (Clarion River, Minister Valley, Morrison, and Hearts Content) totaling approximately 4,670 acres, five IUAs for ATV/OHM use on designated trails (less acreage than Alternative B), Four EUAs where equestrian use is limited to designated trails, but open riding is permitted on

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most of the rest of the forest. Also emphasizes a balanced mix of forest age classes and habitat diversity.

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Alternative D emphasizes restoration of older forest conditions in upland and northern hardwood forest types. It also includes: recommendation for four wilderness study areas (Tracy Ridge, Chestnut Ridge, Minister Valley, and Allegheny Front) totaling 30,000 acres, six remote recreation areas (Clarion River, Lamentation Run, Hearts Content, Morriston, Longhouse, and South Complanter) totaling 30,944 acres, three IAU's for ATV/OHM use on designated trails, three EUAs where equestrian use is limited to designated trails.

General Comments:

It appears that the preferred alternative balances many of the issues associated with the ANF, however, based on our review, we have serious concerns regarding impacts to the Forest resulting from numerous activities, especially potential oil, gas, and mineral activities. Based on the information provided, there is an anticipated range of 3,375 to 12,000 new wells and 850 to 3,000 miles of additional oil and gas roads on the ANF, and by the year 2020 some mineral development. This oil and gas development could result in 6,000 to 20,000 impacted acres from the present through 2025. The DEIS documents direct, indirect and cumulative impacts associated with these activities which include habitat loss, fragmentation, and sedimentation. We strongly encourage the Forest Service to work with the PADEP and the OGM developers to further avoid and minimize impacts associated with these projects. The FEIS should include details as to the minimization efforts that will be implemented.

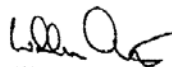
The DEIS should also discuss mitigation and minimization of all impacts associated with activities that occur in the ANF. Sensitive areas should be avoided, and areas of disturbance should be stabilized and restored as soon as possible. The use of herbicides and other chemicals should be minimized to the fullest extent possible.

The FS should work closely with the appropriate state and federal agencies regarding threatened and endangered species and their habitats, and the control of invasive species.

While the DEIS provides a lot of information, it is difficult to navigate the various chapters. A more detailed table of contents and numbered sections within the chapters would be helpful.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



William Arguto,
NEPA Team Leader

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Environmental Impact Statement (EIS) Rating System Criteria

EPA has developed a set of criteria for rating draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft EIS.

- [Rating the Environmental Impact of the Action](#)
- [Rating the Adequacy of the Draft Environmental Impact Statement \(EIS\)](#)

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- **LO (Lack of Objections)** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns)** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections)** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:
 1. *Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;*
 2. *Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;*
 3. *Where there is a violation of an EPA policy declaration;*
 4. *Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or*
 5. *Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.*
- **EU (Environmentally Unsatisfactory)** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

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APPROPRIATIONS
RESOURCES
CO-CHAIRMAN:
CONGRESSIONAL RURAL CAUCUS

Congress of the United States
House of Representatives
Washington, DC 20515-3805

August 18, 2006

Mr. Randy Moore
Regional Forester
USDA Forest Service
626 East Wisconsin Ave, Suite 800
Milwaukee, WI 53203

Dear Mr. Moore,

I appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Proposed Land and Resources Management Plan for the Allegheny National Forest (ANF). The ANF plays an important role in the character and economy of northwestern Pennsylvania, located in the 5th Congressional District, of which I have the distinct honor of serving. Because of the significance of the ANF, I as well as many of my constituents have a keen interest in seeing an equitable plan that provides for the economic stability and growth of our local communities. I commend you and your staff on the Allegheny National Forest for developing this comprehensive plan. Overall, I believe this plan is balanced, meeting the diverse needs of the surrounding communities who rely on the forest and also ensures forests for future generations to use and enjoy.

However, in reviewing the plan, I have the following comments and suggestions for your consideration:

- 1) I strongly support the proposed increase in timber harvest because the ANF is one of the few national forests that generate consistent positive revenues as compared to its costs. The timber harvesting program on the ANF not only pays for itself but returns money to the Treasury. While the allowable sale quantity under the preferred alternative appears to strike a balance between economic sustainability, biology, and conservation, my primary concern is that there will not be enough funds to accomplish the increase in harvesting levels from previous years. The current ANF budget is just over \$19 million, while in order to implement the preferred alternative, nearly \$27 million per year is needed. Additionally, much of the forests on the ANF are nearing maturity and beginning to degenerate creating an unhealthy condition. How does the Forest expect to close this gap?
- 2) Recreation opportunities are relatively diverse as compared to the current condition of the land base on the ANF. I realize this is a huge challenge to provide for the variety of recreational opportunities as well as other resource

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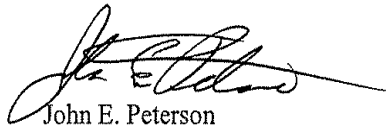
activities such as oil and gas drilling, timber harvesting and conservation. One area worth more consideration is the amount of developed recreation facilities, especially high end lodge or resort type facilities.

- 3) The Wilderness Study areas under the preferred alternative appear to be adequate as compared to the RARE II inventory and the criteria for wilderness designation. The Tracy Ridge and Chestnut Ridge are large contiguous tracts that would more than double the area designated as wilderness on the ANF.
- 4) Because of our country's record setting energy prices due in large part to a lack of a coherent and productive energy policy, oil and gas drilling by private owners of sub-surface minerals on the ANF has increased substantially. The impacts of this increased drilling on the other resources such as gravel, recreation, and timber can be significant. The plan does not appear to lay out a comprehensive action plan on how to address the issue on a strategic forest-wide basis. Such an action plan should describe the management and mitigation options as well as the necessary staff and resources needed to adequately carry out the plan.
- 5) The Allegheny National Forest, like many National Forests across the U.S., is not one contiguous property. Additionally, 93% of the sub-surface minerals on the ANF are not federally owned. Thus, surrounding and adjacent communities and interests should become integral to the management of the Forest. Other than the economic impacts to surrounding communities and seeking comments for the plan revision, there is little in the plan on how the Forest intends to reach out to these communities. The Forest should view these communities and the ANF as the Allegheny Plateau, seeking solutions that optimize the social, economic and biological needs of this region.
- 6) The DEIS states that recreation visits as well as labor income from recreation would not increase significantly under any alternative. The DEIS then states that if the Pennsylvania Wilds program were to succeed, there would be more visits to the ANF, add the potential for more development along Kinzua Reservoir, and there could be a positive and significant impact on the ANF and surrounding communities. A more detailed, comprehensive assessment and analysis of the economic impact and opportunities of these programs is warranted, in an effort to enhance the economic sustainability of the Forest, as well as the surrounding communities.
- 7) The ANF has a significant impact in the Allegheny Plateau, especially the four counties surrounding the Forest. The Forest can use this situation to be a leader and convener regarding forest and natural resource management issues. The plan describes many possible goods and services, but mentions little about the critical role the Forest can play in catalyzing benefits for the local community and the ANF itself.

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I am committed to seeking ways to continue to support wise forest management on the ANF. Most recently, I began working with the ANF staff to find creative solutions that provide the necessary resources to adequately manage the forest on the ANF on a more predictable and sustainable basis, especially increasing timber harvesting. I look forward to working with you on these issues and others that may arise to promote the biological and economic sustainability of the Allegheny Plateau, an area rich in history, resources, and opportunity.

Sincerely,



John E. Peterson
Member of Congress

JEP:gm

cc: Kathleen Morse, Forest Supervisor, Allegheny National Forest

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COMMITTEES:
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CONGRESSIONAL RURAL CAUCUS

Congress of the United States
House of Representatives
Washington, DC 20515-3805

August 25, 2006

Ms. Kathleen Morse, Forest Supervisor
Allegheny National Forest
P.O. Box 847
Warren, Pennsylvania 16365-0847

Dear Ms. Morse:

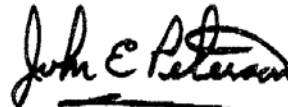
It has been brought to my attention that residents of Elk County plan to present a petition to the Forest Service Office in Warren, commenting on the Purposed Land and Resource Management Plan (PLRMP) and the Draft Environmental Impact Study (DEIS). They are seeking a connector All-Terrain Vehicle (ATV) trail from Bueblers Corner Trail Head to the Sandy Beach Recreational Park in Ridgway.

The length of the proposed extension of the timberline trail would be approximately six miles and would provide trail riders better access to shops, restaurants and lodging in the Borough of Ridgway.

As you work toward finalizing the Forest Plan Revision, I urge you to give serious and thoughtful consideration to safe recreational opportunities that can promote economic stability to our local communities.

If I can be of assistance to you in any way, please don't hesitate to contact my office.

Sincerely,



John E. Peterson
Member of Congress

JEP/pca

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*Thank you for info
on Elk County
ability to provide trail
connections to local
communities is a
consideration of the Forest
we are confident to find*

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Seneca Nation Tribal Historic Preservation

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August 28th, 2006

Kathleen Morse, Forest Supervisor

USDA Forest Service
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Warren, PA 16365

Forest Plan Revision

P.O. Box 36
Warren, PA 16365

RE: ANF Forest Revision Plan: Initial SNI Outline Comments

Dear Kathleen Morse and ANF Planning Staff,

The comments provided by the Seneca Nation of Indians represent an overview of the substantive comments to be provided on September 18th as agreed to through government-to-government consultation between Allegheny National Forest and Seneca Nation representatives at the Seneca Nation Allegany Library on August 25th, 2006. This overview is provided in order to allow Allegheny National Forest Planning staff an opportunity to gain a better understanding of some of the issues deemed pertinent to the Seneca Nation in relation to the proposed plan.

The Seneca Nation appreciates the tremendous undertaking and effort exerted in order to produced the proposed revision plan. In time, this effort and the continued commitment to meaningful and productive consultation between the Allegheny National Forest and Seneca Nation representatives will assist in fulfilling the goals and objectives of this plan.

The outline below depicts the topics that the Seneca Nation of Indians will address in the formal submission. The final Seneca Nation Council comments will expand on these topics, which have also been discussed during consultation meetings between Allegheny National Forest and Seneca Nation representatives. The Seneca Nation of Indians is appreciative of the willingness of Allegheny National Forest representatives to review this outline on the proposed plan.

Nya'weh so:oh gagwe'goh,

Kathleen Mitchell, Director
SNI -- Tribal Historic Preservation Officer
Allegheny National Forest Consultation Representative

Article I. Heritage and Cultural Resources:

Section 1.01 Development of Processes.

- (a) For designation of culturally sensitive areas.
- (b) For collection of carbon dates on sites prior to herbicide treatment.
- (c) For the removal of vegetation on sites.
- (d) For mitigating the potential effects of Seneca heritage tourism.
- (e) For providing Descriptions and Categories on cultural sites.

Section 1.02 Identification of.

- (a) Indigenous cultural sites.
- (b) Culturally significant sites' inclusion on National Register.
- (c) How National Register placement affects site.
- (d) Herbicide impacts on unknown cultural sites.

Section 1.03 Co-management of.

- (a) Cooperative enforcement measures in and around known cultural sites.
- (b) Indigenous heritage resources.
- (c) Seneca heritage tourism.
- (d) Items/materials to be considered for curation.

Section 1.04 Production of text.

- (a) To develop goals and objectives protecting cultural resources.

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Article II. Customary Usage:

Section 2.01 Development of Processes.

- (a) For the collection of medicinal plants.

Section 2.02 Identification of.

- (a) Specific cultural medicinal plant species.

Section 2.03 Co-management of.

- (a) Sustainable Indigenous medicinal plant systems.

Section 2.04 Production of text.

- (a) Goals and objectives in relation to collection of medicinal plant species.

Article III. Water Erosion:

Section 3.01 Development of Processes:

- (a) For anticipation of erosion along Allegheny Reservoir.
- (b) For prevention of erosion along Allegheny Reservoir.

Section 3.02 Identification of.

- (a) Erosion impacts due to recreation use along Allegheny Reservoir.

Section 3.03 Co-management of.

- (a) Enforcement and conservation issues along Allegheny Reservoir.

Section 3.04 Production of text.

- (a) Describing the responsibilities/jurisdiction of Forest lands in and around the Allegheny Reservoir.

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Article IV. Education:

Section 4.01 Development of Processes:

- (a) For the education of Allegheny National Forest staff in relation to--
 - (i) Government-to-government relationships with Indigenous Nations.
 - (ii) Cultural sensitivity training.
 - (iii) Cultural resource identification.
 - (iv) Interpretive Indigenous methodology.

Section 4.02 Production of Text.

- (a) Describing the level of potential education needed to fulfill consultation requirements.

Article V. Resource Development:

Section 5.01 Identification of.

- (a) Increases in oil pricing will have on –
 - (i) Cultural sites.
 - (ii) Heritage sites.
 - (iii) Traditional cultural properties.
- (b) Trends on recreation usage.
- (c) Enforcement issues relating to cultural site impacts.

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Article VI. Definition of:**Section 6.01 Co-management.**

Seneca Nation of Indians and Allegheny National Forest Service representatives have discussed the potential for and requirement of a co-management process within the Allegheny National Forest. Thus, the Seneca Nation of Indians offers the following definition of a potential co-management system that highlights the positive and interactive relationship.

Co-management can be defined as a partnership relationship in which the Forest Service and the Seneca Nation share in the responsibility and authority for the management of specific areas of concern, specifically cultural resources, enforcement and customary usage, within the forest.

In the context of Indigenous peoples Tracy Campbell claims, "The special rights of aboriginal people as guaranteed by treaty are not generally considered when resource development projects are proposed or resource management plans are prepared. Consequently, resources located on aboriginal traditional territory often become the focus for conflict between government, natural resource industries, and First Nation peoples." Co-management of Aboriginal Resources *Information North*, Vol 22, no.1 (March 1996), Arctic Institute of North America.

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RE: Seneca Nation Comments on ANF Forest Revision Plan

Dear Kathleen Morse and ANF Planning Staff,

The comments provided by the Seneca Nation of Indians below on the Allegheny National Forest Revision Plan are a compilation of views from a healthy cross section of Seneca Nation citizens that sit on the Kinzua Dam Issues Committee and staff members of the Tribal Historic Preservation Office. The Kinzua Dam Issues Committee deals specifically with issues that arise out of areas surrounding the Allegheny Reservoir and/or the Kinzua Dam region, which includes much of the Allegheny National Forest lands. The Tribal Historic Preservation Office deals specifically with cultural resources and the implementation and compliance with Federal law for entities engaged in activities that may disturb or disrupt culturally relevant resources of the Seneca Nation of Indians pursuant to the National Historic Preservation Act.

The Seneca Nation looks to the ANF to produce a progressive document that recognizes the essential need to develop solid government-to-government relationships as set forth by Executive Order 13175 and 13336. The Seneca Nation also recognizes the commitment ANF staff has towards enhancing a mutually beneficial partnership between the SNI and ANF to assist in developing a comprehensive management plan for the Forest that is in full compliance with FSM 1563. Therefore, the comments provided below represent a key step to fulfilling the goals of the forest.

The Seneca Nation of Indians is appreciative of the willingness of Allegheny National Forest representatives to review these comments on the proposed plan and look forward to future discussions on how to improve and protect the forest.

Nya'weh so:oh gagwe'goh,

Article I. Heritage and Cultural Resources:

Section 1.01 Development of Processes.

(a) For designation of culturally sensitive areas.

1.) A process should be developed for the designation of culturally sensitive areas within the ANF and if these areas could be perceived as sensitive to the Seneca Nation then this process should be developed in consultation with appropriate representatives of the Seneca Nation.

(b) For collection of carbon dates on sites prior to herbicide treatment.

1.) Another area of concern is the selective use of herbicides used on earthworks, cultural sites, and other archaeological sites. Herbicide use may alter carbon dates, carbon dates should be obtained prior to herbicide treatment of known sites. ANF should work on a process to test the site in consultation with appropriate SNI representatives.

(c) For the removal of vegetation on sites.

1.) While it is important to remove vegetation that could affect a known cultural site, especially large trees that may become wind thrown and subsequently damage a site, the process for removal of the vegetation should be developed in consultation with appropriate representatives of the SNI.

(d) For mitigating the potential effects of Seneca heritage tourism.

1.) Prior to any planning or implementation of heritage tourism at a site that may be perceived as culturally relevant to the Seneca Nation, appropriate representatives of the Seneca Nation should be given an opportunity to provide concerns about areas and consulted on how to mitigate these concerns.

(e) For providing Descriptions and Categories on cultural sites.

1.) A general categorization of the cultural sites that may be perceived as relevant to the Seneca Nation within the ANF should be developed in consultation with appropriate representatives of the Seneca Nation, shared with the appropriate representatives of the Seneca Nation, and then provided high confidentiality status. A description of this process should be addressed in the plan.

Section 1.02 Identification of.

(a) Indigenous cultural sites.

1.) Interpretations of native cultural sites should be made in consultation with appropriate representatives of the Seneca Nation.

(b) Culturally significant sites' inclusion on National Register.

1.) Present and future identified sites that are culturally specific to the Seneca Nation should not be considered for the National Register for heritage tourism purposes, without meaningful and consistent consultation with appropriate representatives of the Seneca Nation.

(c) How National Register placement affects site.

1.) When the ANF is researching for some area to be placed on the national register, then careful consideration should be made in reference to how this registration will affect the site, specifically sites that contain cultural materials. This careful consideration should be addressed in the plan.

(d) Herbicide impacts on unknown cultural sites.

- 1.) The environmental impact study needs to address the application of herbicide in relation to unknown cultural sites and the possibility of carbon contamination.
 - ♦ While Cultural Resource Surveys are generally done in advance of most application and the forest has been surveyed, this hypothetical should be addressed as a way to indicate an understanding by the ANF of the potential interaction by investigators with future archaeological sites.

Section 1.03 Co-management of.

It should be noted that some heritage resources require consistent and thus better protection. Cultural resources that are native in origin must require co-management with the SNI for several reasons: the SNI should possess the ability to increase the monitoring of heritage sites to ensure the integrity of the sites, deter and report any looting or disturbance activities, investigate areas for other anomalies, and practice or maintain contact with cultural sites with spiritual or ceremonial significance.

(a) Cooperative enforcement measures in and around known cultural sites.

- 1.) Enforcement of plan objectives and or general Forest management in cultural areas that are known to be impacted by human intrusion and that also can be easily patrolled by SNI Law Officials should be provided enforcement jurisdiction.
- 2.) The plan needs to address the lack of personnel available to enforce the plan, uphold federal and state law, and protect any perceived properties that may be culturally relevant to the Seneca Nation. All site locations should possess some minimal and maximum protection requirements from looters, vandals, or other types of disruption.

(b) Indigenous heritage resources.

- 1.) Heritage resources need to be managed on a consistent basis. Monitoring of sites needs to be increased, and the people with the most knowledge and interest in the sites need to be involved. Sites that have been mismanaged need to be highlighted as examples

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of what not to do, and then a process should be outlined in the plan that indicates how these sites will be managed in the future and in a manner that is consistent with the plan.

(c) Seneca heritage tourism.

1.) Any enforcement measures should be developed in consultation with appropriate representatives of the Seneca Nation, and should include an ANF/SNI co-management process of any site that may be perceived as culturally relevant to the SNI and is also used as a site to drive tourism to the region.

(d) Items/materials to be considered for curation.

1.) The Seneca Nation would like to curate items removed from a cultural site that is Indigenous in origin or could be perceived as Indigenous in use.

Section 1.04 Production of text.

(a) To develop goals and objectives protecting cultural resources.

1.) The Plan should express plainly and clearly the role cultural resources play within the ANF. The Seneca Nation insists that cultural resources be given the same weight as environmental concerns, and some goals and objectives should be produced by the ANF staff toward the protection of cultural resources in the ANF.

Section 1.05 Specifics, examples and questions for ANF heritage resource staff.

(a) *See Appendix A.

Article II. Customary Usage:

Section 2.01 Development of Processes.

(a) For the collection of medicinal plants.

1.) A customary use policy in reference to medicinal plant gathering and management needs to be addressed. There needs to be an expressed opportunity for Seneca citizens to gather medicines on the National Forest plan and to inventory medicinal plants in areas that are customary used for cultural purposes. ANF Forest service personnel should consult with the SNI to establish a process and procedure for plant gathering for personal use. In addition, there should be a recognized potential for gathering of medicinal plants within specified areas exclusively for Seneca citizens. Protection measures should be included in the plan that ensures these areas are protected from excessive gathering.

2.) In addition, the ability of non-natives to gather plants needs to be defined within the plan in relation to medicinal plant harvesting.

Section 2.02 Identification of.

(a) Specific cultural medicinal plant species.

1.) The plan should address the potential effects of herbicide use on medicinal plants within the environmental impact study. ANF should consult with appropriate representatives of the SNI to develop and identify specific cultural medicinal plants, and then indicate within the plan how to limit the introduction of herbicide on these plants or in areas where these plants grow.

Section 2.03 Co-management of.

(a) Sustainable Indigenous medicinal plant systems.

1.) The plan should develop an objective to produce a co-management of medicinal plant system, where the ANF and SNI work together to maintain sustainable medicinal plant life within the ANF.

Section 2.04 Production of text.

(a) Goals and objectives in relation to collection of medicinal plant species.

1.) Maintaining a healthy forest should include the requirement of the forest to contain and sustain human interaction, especially in relation to human health. Producing areas that promote the health of the forest and human health should be a worthwhile objective of the Forest plan. Additionally, a goal should be to perpetuate historical interaction with the forest by Native peoples.

Article III. Water Erosion:

Section 3.01 Development of Processes:

(a) For anticipation of erosion along Allegheny Reservoir.

1.) The plan needs to address the erosion of areas surrounding the Allegheny Reservoir. Recreation sites around the Allegheny Reservoir should be addressed within the plan, including the use of motorboats coming from ANF recreation areas. The disruption of water due to motorboat usage should be discussed in the environmental impact study, and any erosion to a potentially perceived cultural resource should have a process developed to deal with the erosion.

(b) For prevention of erosion along Allegheny Reservoir.

1.) After meeting the general need to address erosion, measures should be introduced to prevent further erosion of ANF lands that contain culturally sensitive materials of the SNI. These measures should be included in the plan.

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Section 3.02 Identification of.**(a) Erosion impacts due to recreation use along Allegheny Reservoir.**

- 1.) A plan needs to be developed to address the impacts of recreational usage of culturally sensitive areas around the Reservoir.

Section 3.03 Co-management of.**(a) Enforcement and conservation issues along Allegheny Reservoir.**

- 1.) Maintaining a recognizable and meaningful presence in areas that require increased attention due to erosion or the possibility of erosion to culturally sensitive areas should be carried out by as many Law enforcement entities as are available.

Section 3.04 Production of text.**(a) Describing the responsibilities/jurisdiction of Forest lands in and around the Allegheny Reservoir.**

- 1.) The responsibility for the land between the Corydon "River View" Cemetery and the Allegheny Reservoir needs to be evaluated especially in light of erosion concerns.

Article IV. Education:**Section 4.01 Development of Processes:**

The Seneca Nation noticed that there is no mentioning of a process to educate ANF staff in relation to issues that are of concern to the SNI, specifically the education of ANF staff in the context of government-to-government relationships with Native Nations, cultural sensitivity training, cultural resource identification, and interpretative methodology. This process should be developed in consultation with appropriate representatives of the Seneca Nation and then be included in the plan.

(a) For the education of Allegheny National Forest staff in relation to--**(i) Government-to-government relationships with Indigenous Nations.**

- 1.) As stated in Executive Order 13175, "...to remove any procedural impediments to working directly and effectively with Tribal governments..."

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(ii) Cultural sensitivity training.

1.) Having ANF personnel well trained in Native issues should be a goal of the Forest Plan. It is recognized that the ANF personnel have a tendency to rotate to other forest systems. Providing these rotating personnel with up to date information on Native issues will increase the directives and standards outlined in FSM 1563.

(iii) Cultural resource identification.

1.) As stated in FSM 1563(4), "provide research, transfer of technology, and technical assistance to Indian governments."

(iv) Interpretive Indigenous methodology.

1.) ANF staff that have direct contact with the public and may have the potential to address the public on Native issues should possess some understanding of Seneca views and methods.

Section 4.02 Production of Text.

(a) Describing the level of potential education needed to fulfill consultation requirements.

1.) If the ANF does not currently possess an education component for Native issues pursuant to FSM 1563, then this should be included in the Plan.

Article V. Resource Development:

Section 5.01 Identification of.

The Seneca Nation notices that the price of oil is increasing and with it has come an increase in well drilling on the ANF. The plan should address what effect this increase in price will have on the number of oil drilling and extraction structures on the ANF. Any impacts on the aesthetic value of the area that may be affected by any increase in oil extraction should be address in the environmental impact study.

(a) Increases in oil pricing will have on –

(i) Cultural sites.

(ii) Heritage sites.

1.) Any impacts on the aesthetic value of a heritage area that may be affected by any increase in oil extraction should be address in the environmental impact study.

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(iii) Traditional cultural properties.**(b) Trends on recreation usage.**

1.) The impacts that increased road production and oil structures will have on recreation use should be included in the plan.

(c) Enforcement issues relating to cultural site impacts.

1.) How a cultural site is impacted should be monitored by the entities with the most interest in preserving the integrity of the site.

Article VI. Mandatory Conditions:***Section 6.01 Identification of.***

Addressing the conditions on the forest that develop mandatory conditions for the Relicensing of the Seneca Power Plant, the Seneca Nation notes the effects of the Energy Policy Act of 2005. According to the Energy Policy Act of 2005, mandatory conditions can and will be appealed by any licensee that does not desire the conditions proposed. These appeals are costly, time consuming, and in the several instances that appeals have been made, it has cost the Forest Service considerable authority over the conditions and specific project boundary areas affected by a hydro-project. Thus, the Seneca Nation would like to reserve comments on this section until more projects go through the Energy Policy Act of 2005 appeals provisions.

Article VII. Definition of:***Section 7.01 Co-management.***

Seneca Nation of Indians and Allegheny National Forest Service representatives have discussed the potential for and requirement of a co-management process within the Allegheny National Forest. Thus, the Seneca Nation of Indians offers the following definition of a potential co-management system that highlights the positive and interactive relationship.

Co-management can be defined as a partnership relationship in which the Forest Service and the Seneca Nation share in the responsibility and authority for the management of specific areas of concern, specifically cultural resources, enforcement and customary usage, within the forest.

In the context of Indigenous peoples Tracy Campbell claims, "The special rights of aboriginal people as guaranteed by treaty are not generally considered when resource development projects are proposed or resource management plans are prepared.

Consequently, resources located on aboriginal traditional territory often become the focus for conflict between government, natural resource industries, and First Nation peoples.” Co-management of Aboriginal Resources *Information North*, Vol 22, no.1 (March 1996), Arctic Institute of North America.

***Appendix A:**

Comments/Questions for ANF Heritage Program

1. Does the ANF currently have a long-term plan for the Heritage Resources Program?

If so, then we would like to obtain a copy of that document.

If not, then is there a plan to produce such a document?

a.) This actually ties in to most of the other topics.

- ◆ It asks first what has been done with all of the data collected to date.
- ◆ Secondly, whether that data has been used to formulate a plan for interpreting existing sites.
- ◆ Third, can newly discovered sites be easily incorporated into the database to enhance our view of human occupation across this region?

2. Are there protocols that have been formalized forest-wide for the inadvertent discovery of human remains during construction/maintenance activities by either the Forest Service or contractors working on ANF lands?

a.) Specifically, we are asking if there are protocols specific to dealing with the Seneca Nation in addition to any basic procedures previously established by the Commonwealth of Pennsylvania through the Pennsylvania SHPO's office.

b.) We know that this ground has been covered during the course of dealing with events at the Riverview-Corydon cemetery but we are not certain that a final document was ever produced.

- ◆ The principal reason for bringing up this subject is that we really need to have actual formal documents on file that all parties can refer to when situations like this arise. Our experience with the Riverview-Corydon cemetery once again points out the fact that good intentions do not always result in a product. We are uncertain if we ever did receive a document that spelled out precisely what steps need to be taken when inadvertent discoveries are made. Although there may be something that is specific to the Riverview area we are uncertain if it has been formally reviewed and approved by SNI staff.

3. What plans does the Heritage Program have either in-hand, or in-process, that address the continuing concerns about cultural resources within the limits of the Allegheny Reservoir?

a.) Specifically, are there any projects designed to assess site survival or otherwise expand on the topics considered by the COE's drawdown study?

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- b.) Has any thought been given to implementing simple examinations of recorded sites when reservoir levels allow them to be visited?
 - ◆ Specifically, we would be interested in knowing if these older recorded sites are still intact. If they are not, then it would be worthwhile to know what the mechanism of their destruction actually entailed.
- 4. Has the Heritage Program reached any decisions about the treatment of the earthwork sites in Elk County?
 - a.) At the McKinley site:
 - b.) How long have the blowdowns at the McKinley site been in place?
 - ◆ When are these trees to be removed?
 - ◆ Has the site been re-mapped to show the amount of damage inflicted by the blowdowns and indicate the precise position of the fallen trees?
 - c.) At the Russell City site and its companion:
 - ◆ What exactly is planned for these resources?
 - d.) Has the Forest Service, with Heritage and Biology specialists, made specific plans for their long-term management?
- 5. What is the status of National Register nominations for both prehistoric and historic sites across the Allegheny National Forest?
 - a.) Does any such plan exist?
 - ◆ Has the existing site database been examined to identify the range of sites that have been identified?
 - ◆ Have sites been looked at in terms of ranking according to value for specific types of research, potential for vandalism, potential for destructive impacts through erosion or encroachment by construction, etc.
 - b.) Similarly, is an annual list compiled that provides information on site status? By this we mean how many sites are actually regularly examined during the year to check on their condition and make a determination regarding security.
- 6. After almost forty years of Phase 1 level survey work there must be some generalizations that can be made about the resource base on the ANF that differs from that proposed in early models. Are there any targets for the level of sites to be investigated through Phase 2 testing?
 - a.) What about updating the range of lumbering-related sites and any other large categories of historic resources?
 - b.) Are prehistoric sites being examined for distributions in relation to micro-level environmental zones, watershed similarities/differences, general density drop-offs on the interior plateau, continuity of trail use, etc., etc.?

c.) Are any studies being considered that look for relationships between different nearby sites of similar age or apparent function?

- ◆ We continue to receive massive reports on projects and CR surveys done for large tracts of land. The amount of new information is generally minimal and the incorporation of existing data also falls short of the mark. We would rather see an effort made to synthesize, or at least summarize, existing site data rather than simply rehash what has been done in the past and fill dozens of pages with copies of site forms.
- ◆ There have been several reports recently done in Pennsylvania focusing on settlement pattern studies within watersheds and/or larger regions of the state. The ANF might be better served by incorporating some of that material with their site database to see how their data compares.

7. There was one contracted project done by NEA(?) on an ATV trail in Bradford District that did identify a variety of new sites through more intensive shovel testing. The results of that testing would be of great interest but there appears to have been some delay in producing a report.

a.) Is there some reason for the delay?

b.) Unless there are regional or national mandates to the contrary we would think that shorter reports on Phase 1 work would be appropriate and that greater emphasis be placed on evaluations and integrating the work into a better understanding of the what the current database has to offer in terms of prior settlement and land use across the Forest.

Pennsylvania Fish & Boat Commission
Bureau of Fisheries
Division of Environmental Services
450 Robinson Lane
Bellefonte, PA 16823
814-359-5133
August 8, 2006

Allegheny National Forest
Plan Revision
P. O. Box 36
Warren, PA 16365

Dear Sir/Madam:

The Pennsylvania Fish and Boat Commission appreciates the opportunity to provide comments on the Allegheny National Forest Draft Environmental Impact Statement. Our comments follow:

Draft Environmental Impact Statement comments:

p. 3-3- and 3-31 Sediment minimization and aquatic habitat preservation.

We recognize the severe impacts road and trail construction, use and maintenance cause with sedimentation effects on streams and wetlands. We support management practices cited in the plan such as placing limestone gravel on roads within 300 feet of streams, minimizing logging roads and facilities in riparian areas, locating ATV trails away from steep slopes and wetlands and minimizing human based recreation facilities that can affect streams.

p. 3-34 Fish and Wildlife Habitat Improvements.

We suggest addition of a management initiative that allows enhancement of habitat for sensitive or state endangered or candidate fish species. These species would likely be most affected by land use perturbations.

p. 3-37 Herbicides and Fertilizers

We recommend that buffers apply also to shallow groundwater areas and saturated soils. This restriction applies to many pesticide product labels and makes sense in forest management in a sensitive environment. Small streams, in particular, are susceptible to drift. We believe that a 25-foot buffer is too narrow and suggest 50 feet unless a product labeled for aquatic use (for example Rodeo for a glyphosate product) is used in the 25 to 50 foot buffer area. The toxicity of sulfometuron is low enough for aquatic plants and animals that it should not be used within 50 feet of perennial streams, lakes, impoundments, springs, seeps, intermittent streams, shallow groundwater areas and saturated soil. This would reduce the risk of using a sulfometuron

Allegheny National Forest
August 8, 2006
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product. The cut surface treatment, which is not to occur within 10 feet of water, is a very selective treatment and is of minimal risk as described.

p. 39. Riparian corridors

In this section, as well as p. 3-37, Potential Harvest Activity, we reiterate the same recommendation we made to DCNR Bureau of State Forests, which is to limit harvest and activities within 50 feet of the top of bank to those that activities that benefit the riparian area and integrity of the waterway. This is consistent with regulation of encroachments along Commonwealth waterways in Chapter 105 Regulations. Section 105.1 of Dam Safety and Waterway Management Regulations use FEMA identified floodways, or in the absence of designation, 50 feet from top of bank to regulate encroachments on streams. Adoption of such a standard would assist statewide consistency. Necessary crossings would be minimized as stated in your plan and specifications can be reviewed by appropriate agencies as needs arise.

We observed reference to vernal pool protection in the Draft EIS Summary, but failed to see it in the full Draft EIS. We believe a 150-foot buffer that limits earth disturbance and timbering around vernal pools is important to this unique habitat. The 150' buffer would protect a portion of the larger home range used by amphibians that the pools support.

P. 3-116 Forest stocking and age

The PFBC recognizes the beneficial effect of shading on stream temperatures and the likelihood that proposed alternatives B through D would lead to additional shading. We do not, however, have the expertise to comment on the merits or pitfalls of even-aged forest management alternatives.

p. 3-224 to 3-228 Timber rattlesnake and aquatic invertebrates.

We believe that these organisms are good representative Management Indicator Species and concur with their use to measure potential impacts.

p. 3-245. Recreation Opportunities

The discussion of fishing as a current and traditional important recreation activity is conspicuously absent, as are discussion of potential impacts of various management alternatives. The Fish and Boat Commission has partnered extensively with the Allegheny National Forest in the past to manage recreational fishing. We believe such discussion is a serious omission in the Draft EIS and we offer to provide substantive input on existing and potential recreational use and resource management as potentially affected by future management.

p. 3-291. Wild and Scenic Rivers.

We note the reference to the Clarion River Water Trail and its goals of promoting stewardship and low-impact use. We support the Forest Service's concurrence on compatible use. We believe the management objectives used to evaluate all alternatives, including federal requirements, will lead to adequate protection and consideration of impacts on the Allegheny and Clarion Rivers, Clarion Creek, Bear Creek, Tionesta Creek and the East Branch of Tionesta Creek as important scenic and boating resources.

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Allegheny National Forest
August 8, 2006
Page 3

Proposed Land and Resource Management Plan comments will be provided separately. Please contact me at (814) 359-5133 or e-mail mhartle@state.pa.us with questions or follow-up comments. Thank you again for the opportunity to provide input into your process.

Sincerely,

Mark A. Hartle, Chief
Aquatic Resources Section
Division of Environmental Services

c: J. Arway, T. Ford, A. Woomer

Pennsylvania Fish & Boat Commission
Bureau of Fisheries
Division of Environmental Services
450 Robinson Lane
Bellefonte, PA 16823
814-359-5133
August 9, 2006

Allegheny National Forest
Plan Revision
P. O. Box 36
Warren, PA 16365

Re. Comments on Allegheny National Forest Proposed Land and Resource Management Plan

Dear Sir/Madam:

The Pennsylvania Fish and Boat Commission appreciates the opportunity to provide comments on the Allegheny National Forest (ANF) Proposed Land and Resource Management Plan. Our comments address some issues we have addressed from a statewide perspective as well as some locally important items.

We would like to provide the following comments:

p. I-5. Oil and gas development impacts

The plan states, "Work continues with private parties to ensure that surface development associated with subsurface oil and gas causes the least impact." No details are provided, nor were they found elsewhere as to what kind of work, activity, standard, guideline or monitoring would occur to assure the least amount of impact. Given our agency's experience and history with impacts of oil and gas extraction in Northcentral Pennsylvania, we strongly recommend that activities be planned and documented to assure minimal impact.

p. I-8. Recreation Management

We note that recreational fishing and boating were not specifically addressed in management goals. Our agency recognizes the Allegheny National Forest is an important destination for recreational fishing and boating and suggests that these activities be recognized in the statement of goals as managed activities compatible with management of the National Forest.

p. I-10. 2600 Wildlife, Fish and Sensitive Plant Habitat.

We suggest addition of a management plan goal that allows enhancement of habitat for sensitive or state endangered or candidate fish species. These species would likely be most affected by land use perturbations. We concur with the goal of rattlesnake den maintenance.

p. II-31. Monitoring Questions, 2500 Water and Soil Management.

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We support use of aquatic invertebrate annual monitoring evaluated every 5 years to reassess plan effectiveness. Such monitoring will capture natural variability and the 5-year review will be an appropriate time frame in which to evaluate changes.

p. III-3. Pesticide Application. Guidelines.

Use of an insecticide such as Bt approved for aquatic use is critical when addressing both site-specific and widespread defoliation and our agency tenaciously supports this guideline.

p. III-3. Pesticide Application. Standards.

We suggest use of a product labeled for aquatic use within 50 feet of perennial streams, lakes, impoundments, springs, seeps, intermittent streams, shallow groundwater areas and saturated soil. We make buffer recommendations immediately below.

p. III-5. Herbicide Application, Buffers.

We recommend that buffers apply also to shallow groundwater areas and saturated soils. This restriction applies to many pesticide product labels and makes sense in forest management in a sensitive environment. Small streams, in particular, are susceptible to drift. We believe that a 25-foot buffer is too narrow and suggest 50 feet unless a product labeled for aquatic use (for example Rodeo for a glyphosate product) is used in the 25 to 50 foot buffer area. The toxicity of sulfometuron is low enough for aquatic plants and animals that it should not be used within 50 feet of perennial streams, lakes, impoundments, springs, seeps, intermittent streams, shallow groundwater areas and saturated soil. This would reduce the risk of using a sulfometuron product.

p. III-21. Roads and Trails, Guidelines.

We recognize the sensitivity of the landscape to roads and runoff when slopes exceed 8%. We note that the plan states, "grades up to 20% (are) acceptable for short pitches up to 200 feet when sufficient stabilization is provided." This standard is vague, provides no substantive guidance and requires more detail to be effective. What is sufficient stabilization?

p. III-22. Water, Guidelines.

The following statement is ambiguous. "Woody material naturally occurring in streams should only be removed when fisheries habitat is being degraded." It should be restated to say, "Woody material naturally occurring in streams should only be removed when the material is degrading fish habitat in the stream section. We affirm the value of woody material.

p. III-22. Road and Trail Stream Crossings, Guidelines.

We agree with project designs favoring bridges and bottomless arches and culverts. When enclosed culverts are necessary, we recommend adoption of "fish-friendly" criteria developed by the Fish and Boat Commission and Pennsylvania Department of Transportation and recognized by the Department of Environmental Protection. Criteria are entitled BD-632M Reinforced Concrete Box Culvert Design and are found on the following website:

<http://www.dot.state.pa.us/Internet/BQADStandards.nsf/home?OpenFrameset>

p. III-23. Rivers and Streams. Suggested Standard.

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We suggest that the following standard be adopted to protect existing uses. "Support the most protective water use designation merited by the biological and chemical characteristics of a stream basin as defined by Pennsylvania Department of Environmental Protection 25 Pa. Code, Chapter 93, Water Quality Standards Regulations." Such a standard will allow Allegheny National Forest Staff to best support the most protective water quality designation.

p. III-25. Springs, Seeps and Vernal Ponds, Guidelines.

Our agency supports the 50' buffer zone in these areas. To be consistent with 25 Pa. Code, Chapter 105, Dam Safety and Waterway Management Regulations, Section 105.1, we believe the 50 feet should be further defined to include 50' from top of each bank of a spring or seep.

The Pennsylvania Department of Conservation and Natural Resources uses the following guidelines to protect vernal pools, a unique and critical habitat for amphibians. We recommend adoption of DCNR's 200' buffer in the Allegheny National Forest Plan, since we believe the DCNR standard to be better defined and more protective. Please note that the 200' buffer was misidentified as 150' in our August 8, 2006 correspondence regarding the Draft EIS. The correct language below was taken directly from the DCNR State Forest Management Plan.

Guidelines:

1. 200-foot buffer zone to retain shading and minimize soil and leaf litter disturbance.
 - a. Maintain a 100-foot wide "no disturbance" buffer around the perimeter of the pond.
 - b. Manage an additional 100-foot buffer around the "no disturbance" area in which is retained at least 50% canopy closure or a minimum basal area of 60 square feet of live tree.
 - 1) Restrict cutting operations within the buffer to November through January
 - 2) Any ruts created within the buffer must be graded or raked to the original contour.
 - 3) Recreational trails may be located within the buffer, provided the trail does not cause an influx of sediment into the pond.

III-33. Reptiles and Amphibians.

We concur with selection of Eastern box turtle, wood turtle, timber rattlesnake, four-toed salamander and coal skink guidelines and suggest that timber rattlesnake take not be allowed in Management Area 8.5 Research Natural Area. If populations continue to decline in the ANF as they have statewide, we recommend reevaluation of management plan elements affecting timber rattlesnakes in the future.

Appendix A, p. A-36.

Cut surface herbicide treatment, which is not to occur within 10 feet of water, is a very selective treatment and is of minimal risk as described.

Allegheny National Forest
August 9, 2006
Page 4

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The Pennsylvania Fish and Boat Commission is willing to discuss any comments or issues additionally. Please contact me at (814) 359-5133 or e-mail mhartle@state.pa.us with questions or follow-up comments. Thank you again for the opportunity to provide input into your process.

Sincerely,

Mark A. Hartle, Chief
Aquatic Resources Section
Division of Environmental Services

c: J. Arway, T. Ford, A. Woomer



COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Game Commission
2001 ELMERTON AVENUE
HARRISBURG, PA 17110-9797

August 9, 2006

Kathleen Morse, Supervisor
Allegheny National Forest
Plan Revision
P.O. Box 36
Warren, PA 16365

Dear Ms. Morse:

Please see attached comments on the Draft Environmental Impact Statement and Proposed Land and Resource Management Plan for the Allegheny National Forest. We appreciate the opportunity to comment and look forward to continuing our cooperative efforts with the Allegheny National Forest.

Sincerely,

Carl Roe
Executive Director
Pennsylvania Game Commission

Attachments

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ADMINISTRATIVE BUREAUS:

PERSONNEL 717-787-7836
ADMINISTRATION 717-787-5670
AUTOMOTIVE AND
PROCUREMENT DIVISION 717-787-6594
LICENSE DIVISION 717-787-2084
WILDLIFE MANAGEMENT 717-787-5529
INFORMATION & EDUCATION .. 717-787-6286
LAW ENFORCEMENT 717-787-5740
LAND MANAGEMENT 717-787-6818
REAL ESTATE DIVISION 717-787-6568
MANAGEMENT INFORMATION
SYSTEMS 717-787-4076

www.pgc.state.pa.us

 Reviewer's Guide to the DEIS and to the Proposed Land and Resource Management Plan

Mail comments to:
 Allegheny National Forest
 Plan Revision
 PO Box 36
 Warren, PA 16365

Fax comments to: 814-726-1465

E-mail to: r9_anf_fpr@fs.fed.us

Your name Carl G. Roe Title (if applicable) Executive Director
 Organization (if applicable) Pennsylvania Game Commission
 Address 2001 Elmerton Avenue
 City Harrisburg State PA ZIP 17110
 Email address croe@state.pa.us

You may comment on any parts of the DEIS and PLRMP. The following topics will help you focus your comments and help us to better respond to your comments. You do not have to fill in every section in order to comment. At the end of the form, you will find a place to comment on other issues, alternatives, management direction and monitoring. Feel free to use additional pages.

Issues in the DEIS (please check the topics you are commenting on)

- ☒ Forest Vegetation ☒ Habitat Diversity ☒ Recreation
☐ Special Areas including Roadless Areas and Wilderness
☐ Other Concerns

Reviewer's Guide to the Draft Environmental Impact Statement

PLRMP (please check the topics you are commenting on)

- ☐ Desired Condition
- ☐ Goals
- ☐ Objectives
- ☐ Suitable Uses
- ☒ Standards
- ☒ Guidelines
- ☒ Management Areas
- ☒ Monitoring

Any other comments regarding the DEIS and Proposed Land and Resource Management Plan?

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Plan Comment 1.
Intensive Use areas surrounding SGL

Alternatives A, B, and C propose two Intensive Use Areas that will surround the northern half of State Game Lands #28. If implemented, SGL 28 may inadvertently serve as an access corridor between the areas. Currently, illegal ATV and snowmobile use represent the greatest source of State Game Land citations written by Pennsylvania Game Commission Wildlife Conservation Officers. It is reasonable to believe such illegal activity will increase on SGL 28 if the parcel is surrounded by ANF Intensive Use Areas.

ATVs and snowmobiles are not permitted on most SGL due to habitat degradation, direct mortality and increased stress to wildlife. Under that premise, intensive use is contradictory to stated objectives in Management Area 2.2 (Late Structural Linkages where “wildlife management emphasizes species with viability concerns, remote and interior species with *high sensitivity to disturbance*, and protection of unique micro and macro habitats.”). In alternatives B, C and D, proposed Intensive Use Areas near SGL 28 overlap with and effectively cutoff an important Late Structural Linkage Management Area (ANF Planning Maps Alternatives B, C, D).

We propose a minimum buffer of ≥ 2 miles around State Game Lands and recommend excluding intensive use from Late Structural Linkages.

Plan Comment 2.
Monitoring of habitat diversity

Providing vegetative diversity, including an oak component, is a commendable objective for wildlife habitat. The proportion and number of acres in various age classes and forest types (as measured in the proposed Monitoring Plan) represent an important *component* when measuring habitat diversity. However, current research in wildlife-landscape relationships reveals configuration, structure, and proximity of forest types/age classes are important components that ultimately determine habitat quality. These spatial features are easily quantified with GIS and should be used to monitor wildlife, fish, and sensitive plant habitat. The “Monitoring Questions” to address these parameters include:

- Are forest types and age classes adequately interspersed to provide quality habitat?
- Are patch size and configuration adequate to provide quality habitat?

Numerous wildlife studies can provide baseline information to compare results on ANF and answer these questions.

Plan Comment 3.
Consistency in silviculture terminology

Regarding group selection in uneven-aged management, we support the suggestion made by Eric Zenner (EMAC, June 2006) to retain consistency with current silviculture terminology for uneven-aged management practices. Specifically, proposed 1 – 3-acre cuts in Allegheny hardwoods and Oak hardwoods are inconsistent with the current SAF group selection definition of, “...maximum width of groups is approximately twice the height of the mature trees.” Although there are regeneration and habitat utilities in the larger 1 – 3 acre units, they should not be referred to as “group selection”.



Pennsylvania Department of Conservation and Natural Resources

Rachel Carson State Office Building
P.O. Box 8552
Harrisburg, PA 17105-8552
August 25, 2006

Bureau of Forestry

717-787-2703
Fax 717-783-5109

Allegheny National Forest
Plan Revision
PO Box 36
Warren, PA 16365

Dear Allegheny National Forest:

The Department of Conservation and Natural Resources has coordinated with the Departments of Agriculture and Environmental Protection (DEP) to provide the Commonwealth's response to the Allegheny National Forest Proposed Land and Resource Management Plan issued May 2006 (the Plan).

The Commonwealth commends the ANF and its staff for seeking public input during its planning process. The ANF is a unique and highly-valued ecological, social, and economic resource in Pennsylvania, and particularly so for the four counties in which it resides. Local communities depend on the ANF as an important source of employment, raw materials, ecological services, peace and solitude, and recreational opportunities.

The Commonwealth finds that, among the alternatives presented by the Plan, the preferred alternative, Alternative C, offers a balanced, science-based consideration of the wide range of uses and values of the forest. This alternative represents a reasonable approach for addressing the contentious resource management conflicts that have polarized the management of this forest over the years. As such, we support the Plan premised upon the adoption of Alternative C.

Importantly, Alternative C proposes to more than double the lands protected as Wilderness while also precluding road construction and timber harvesting in the inventoried roadless areas. The disposition of the 34,000 acres originally designated as roadless will grow to over 47,000 acres proposed for roadless management under Alternative C.

Alternative C also outlines a balanced approach to timber harvest, and the plan's full implementation will represent a significant increase in activity compared to recent years, aiding in the achievement of many Plan objectives and providing economic benefit to surrounding communities.

While our specific comments are included in the attached, we briefly note a few key comments in this letter: firstly, that full protection of any management areas within the ANF is subject to exercise of subsurface rights, 93% of which are privately held. Thus, any management planning and implementation is vulnerable to disruption as a result of oil or gas development.

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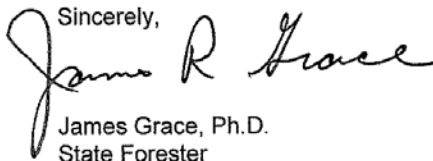
-2-

August 25, 2006

Additionally, forests in Pennsylvania, especially the ANF, face many impacts that hinder forest regeneration, the fundamental component of sustainable forest resource management. Insects, diseases, invasive plants, overpopulations of white-tailed deer and soil conditions all require specific, flexible management practices. Even-aged forest management is often the most effective system to promote desirable regeneration, balance age classes across the forest, manage timber harvesting activities and enhance biodiversity and we therefore caution against too much reliance on uneven-aged timber harvest to achieve plan goals in the ANF.

Again, the Commonwealth supports Alternative C and commends the ANF on this Plan and the collaborative process through which it was developed. If you have questions or need to discuss any aspect of our response to the Plan, please contact me.

Sincerely,

A handwritten signature in black ink that reads "James R. Grace". The signature is fluid and cursive, with the first name "James" being the most prominent.

James Grace, Ph.D.
State Forester

Commonwealth of Pennsylvania response to the Allegheny National Forest Proposed Land and Resource Management Plan (the Plan) issued May, 2006

1. Full protection of any management areas within the ANF is subject to exercise of subsurface rights, 93% of which are privately held. Development of private subsurface oil and gas rights within the protected areas could threaten management objectives and protection measures associated with the various Management Areas. While the draft management plan does not define the magnitude of this threat or estimate the value of these rights and therefore the likely costs of prohibiting roads and well pads in the proposed protected areas, we feel it is important to acknowledge this constraint to protection in the plan.
2. Acquisition by the ANF of outstanding subsurface oil, gas, and mineral rights where possible, particularly in special management areas, will powerfully impact the true ability to protect these areas. Therefore, we recommend that the ANF consider a mechanism to purchase subsurface rights to preserve the integrity of the most ecologically sensitive areas. Likewise, the ANF's assertive management of private oil and gas development will further minimize surface disturbance and associated impacts to forest users and ecological resources. We encourage communication and development of mutual understandings with DEP and private subsurface interests.
3. The Commonwealth encourages the full implementation of silvicultural treatments as planned in Alternative C. Full implementation will represent a significant increase in activity compared to recent years, which will aid in the achievement of many plan objectives and provide economic benefit to surrounding communities.
4. Forests in Pennsylvania, especially the ANF, face many impacts that hinder forest regeneration, the fundamental component of sustainable forest resource management. Insects, diseases, invasive plants, overpopulations of white-tailed deer and soil conditions are all impacts that require specific, flexible management practices to overcome. Even-aged forest management is often the most effective system to promote desirable regeneration, balance age classes across the forest, manage harvesting activities and enhance biodiversity. We caution the ANF on too heavily relying on uneven-aged silviculture to achieve plan goals. We encourage the monitoring of silvicultural treatments to ensure successful forest regeneration, making adaptations when necessary.
5. The Commonwealth supports the expansion of the Kane Experimental Forest and the continued cooperation with the NE Forest Experiment Station as proposed in Alternative C.
6. We recommend that the ANF develop a construction and maintenance program for the many miles of dirt and gravel roads and rock pits to reduce the amount of sediment that reaches streams and rivers in the region.

7. Under Forest Service File Code 2800 (Minerals and Geology), we offer the following comments to the "Private Minerals" section:

- In the fourth paragraph under "Standards," we would edit to reflect that the OGM operator must comply with Commonwealth regulations and policies for erosion and sediment control, and Commonwealth and Federal law and regulations for spill prevention and response.
- In the seventh paragraph under "Standards," we would edit to reflect that the OGM operator must also manage and dispose produced fluids, drilling and completion fluids, and other pollutorial substances in compliance with Commonwealth regulations and Federal Clean Water Act.
- In the ninth and tenth paragraphs under "Standards," if federal or state threatened or endangered species are identified; the appropriate agency (Fish and Boat Commission, Game Commission, Conservation and Natural Resources, Fish and Wildlife Service) must be notified along with a copy to Department of Environmental Protection. We recommend development of a guideline for protecting species with viability concerns so potential impacts can be mitigated.
- We recommend development of a standard for rock pit management.
- In the eighth paragraph under "Guidelines," under commonwealth law and regulations, the well site must be restored after drilling and after plugging the well. We therefore recommend that this not be a guideline but a standard, as it is a commonwealth requirement.



"Grace, James \ (DCNR -
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08/28/2006 07:06 PM

To <r9_anf_fpr@fs.fed.us>
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bcc

Subject Change to Commonwealth of PA Comments

Please amend the comments from the Commonwealth of PA to include the following change in Comment #2

We encourage efforts to balance the age-class distribution within the forest and silvicultural activities appropriate for the sites: where appropriate, the Allegheny Forest type should continue to be promoted as a component of the forest, and oak regeneration should be encouraged in areas more appropriate to the oak type.

Comment # 2 should be as follows:

The Commonwealth encourages the full implementation of silvicultural treatments as planned in Alternative C. Full implementation will represent a significant increase in activity compared to recent years, which will aid in the achievement of many plan objectives and provide economic benefit to surrounding communities.

Forests in Pennsylvania, especially the ANF, face many impacts that hinder forest regeneration, the fundamental component of sustainable forest resource management. Insects, diseases, invasive plants, overpopulations of white-tailed deer and soil conditions are all impacts that require specific, flexible management practices to overcome. Even-aged forest management is often the most effective system to promote desirable regeneration. We encourage efforts to balance the age-class distribution within the forest and silvicultural activities appropriate for the sites: where appropriate, the Allegheny Forest type should continue to be promoted as a component of the forest, and oak regeneration should be encouraged in areas more appropriate to

201

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Bruce C. Burdick John C. Egbert Clifford D. Lane
McKEAN COUNTY COMMISSIONERS
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August 24, 2006

Allegheny National Forest
Attn: Forest Plan Revision Comments
PO Box 36
Warren, PA 16365

Formal input to ANF Draft Environmental Impact Statement

Attached are observations, analysis, and recommendations to be considered as the formal input from the Commissioners of McKean County.

Introduction

1. We recognize the complex nature of managing 500,000 acres of public land.
 - impact of insects and diseases
 - oil and gas industry activity
 - competing purposes of its use
 - recreation
 - economic development
 - conservation
 - legislation
 - authorities involved
 - US Forest Service
 - Corps of Engineers
 - Commonwealth of Pennsylvania
 - Private land owners within and around the forest
 - Other Federal agencies

Considering this, the Draft Plan has, where it has control, done well at considering the vastness of the asset and the variety of the interest groups.

2. Secondly, we recognize that it is much easier to review and comment on a proposal than it is to generate one. We commend the ANF on the comprehensive and thorough treatment given to the Draft Plan. Our comments reflect a different set of goals with stronger focus on economic output.

3. As best we can, the comments and recommendations made represent the County citizens from workshops conducted in conjunction with our own Comprehensive Planning Process, discussions with forest industry interests, the Allegheny National Forest Vacation Bureau, and the Pennsylvania Bureau of Forestry.

4. The comments and analysis are based upon “Alternative C” as compared to “Alternative A”, or the current situation.

Comments and Recommendations

A. Research and Experimentation.

Comment:

We are pleased with the increase in size of the Kane Experimental Forest, MA 8.6. The findings of the Forest Laboratory promote excellent forestry practice not only on the ANF, but throughout the region. Both public and private foresters have benefited from the research conducted there and applied to our local forest types.

Recommendation:

1. Set aside a portion of the “Chestnut Ridge” area as a second Experimental Forest Laboratory for conducting research to regenerate our oak forest and hopefully, understand and someday reintroduce disease resistant chestnut into our local forests. This is in support of the description of the issue described on pages A-12 and A-13 of the Proposed Plan.

2. Change the suitability of “Interpretive Trails,” in Table IV-32 of the Proposed Land and Resource Management Plan from Unsuitable to Suitable. The experimental forest, by its very nature lends itself to “scientific and demonstration/education use” of the forest as described in the Guidelines under code 2700 (page IV-61) beyond what has been primarily conducted on a formal or group environment. Allow visitors to travel an Interpretive Trail that is self-guided. This would be especially valuable near or connecting to the three existing primitive campsites, although a trailhead at the Experimental Forest Headquarters site is preferred. This would enhance the value of the work and support the ANF guideline of “public education.”

B. Recreation Development.

Comment:

The Commissioners are pleased to see a designated special equestrian use area included in the Draft Plan. We are also in favor of the ANF working to provide connectivity for snowmobile trails.

Recommendation:

Delineate areas on the plan map that are possible sites for recreation/lodging development, such as; Willow Creek, Sugar Bay area, and Kinzua Beach area. The Plan’s discussion of Recreation in appendix B-2 of the plan concentrates on miles of trails and does not address the significant increase of demand for upscale lodging and upscale campsites as reported by the Allegheny National Forest Vacation Bureau in its tally of requests by type and frequency.

Lack of funding for such development is not a reason for not pursuing a project of motel/restaurant accommodations. This ignores the variety of funding and resources that are available from the private sector or other public agencies.

C. Forest Health

The Pennsylvania Forest Inventory, 2004, as conducted by the U S Forest Service, in partnership with the PA Bureau of Forestry, concluded that “Tree generation is severely lacking and half of Pennsylvania’s forests are at risk of regeneration failure, due mostly to white-tailed deer overbrowsing.”¹ Since 1955, Seedling-sapling stands have decreased from 23% to 10%, while large diameter tree stands have moved from 28% to 58%.

Quoting from the Pennsylvania Regeneration Study:

“Based on the following consideration – current white-tailed deer densities, understory conditions, and established guidelines for regenerating hardwood forests for those sites where overstory disturbance has created light conditions where regeneration should occur – only 50% of the study sites had sufficient seedlings and saplings to replace the existing forest with a similar tree composition. In other words, if disturbed, such as through a windstorm, insect or disease outbreak, or timber harvest, half of Pennsylvania’s forests are at risk of failing to regenerate! If this analysis includes stands with closed canopies, the outlook is even more negative.”

And again:

“It is appropriate to say that based on available evidence, although some variation exists across the commonwealth, the regeneration problem is ubiquitous and is not specific to a particular region, owner, or forest type. Forestry experts strongly recommend that tree seedlings be in place before harvesting in order to establish a new forest.”²

D. Forest Aging

	Land Area	<u>Alternative C</u>	
		Goal % in age class 0-20 yrs	>110 yrs
Wilderness/wilderness study (MA 5)	23,075Ac	very low	very high
Late Structural Linkages (MA 2.2)	123,445Ac	<4	70
Even-aged Mgmt (MA 3.0)	283,990Ac	8-10	high

Observation:

The chart shown in figure ES-2 is very revealing. The goal for age distribution in 2060 is heavily weighted to oldest age classifications. However, the description of the current situation shows a huge disparity from that goal. The older-age goal exacerbates the already serious regeneration issue in our forests.

Recommendation:

1. Preferred age distribution in MA’s suitable for timber harvest (approximately 355,000 acres): 0-50 yrs, 25%; 51-110 yrs, 50%; > 110 yrs 25%. Preferred distribution is suggested because of regeneration concerns in the forest, exacerbated by large shading canopies generated by the older age philosophy.
2. A more aggressive timber harvest plan in the short term to provide a head start of regeneration to achieve the long term plan goal of age distribution.
 - a. Increase Allowable Sale Quantity to 70-75 million board feet annually during the first ten years.

¹ The State of the Forest: A Snapshot of Pennsylvania’s Updated Forest Inventory 2004, USDA, PA DCNR, September 2004

² IBID; pg 5

Note: Refer to harvest quantities in percentage of land area instead of millions of board feet.
Example: 1% for 100 year rotation or 0.67% for 150 year rotation.

3. Change the designation of MA 2.2 to MA 6.1, still providing the connectivity for wildlife movement.
This reduces the long term age goal in line with our other comments.

E. Wilderness Study Areas

Recommendation: No wilderness study areas be designated. The following nearby areas provide wilderness type experience:

Cook Forest State Park	7182 acres of uncut forest
Allegheny State Park	65,000 acres of uncut forest
State Forests of Pennsylvania provide 27% of their 2.1 million acres (567,000 acres) as Wild and Natural Areas, Bioreserves and Old Growth.	
Pennsylvania Game Lands allow no motorized vehicles.	

Additional wilderness areas on the ANF will limit management activities such as; dealing with forest health issues like insect or disease outbreaks, natural disasters such as the 2003 windstorms, or enhancing chestnut tree recovery efforts of known chestnut populations. The areas proposed for Wilderness Study remove prime recreational areas around the reservoir from lodging development. Further, if we read the maps correctly, the Willow Bay complex is reduced in size, which is at variance with the increased demand for recreational access to the reservoir.

F. Economic Development

The County's primary concern is on sustaining and improving the economic contribution of the ANF from timber harvests, research and experimentation, education, and tourism. School districts, Townships and Boroughs depend heavily on the financial support provided from the activities on the ANF. For example, Corydon Township is approximately 90% ANF. The proposed Wilderness Study Area in that area would diminish economic development potential.

Alternatives A, B, and C indicate a significant increase in economic impact. Compared to the previous five year period, the new Plan requires a much more aggressive management of revenue generating activities presenting significant challenges.

A healthy forest, productively managed, under a plan that supports aggressive regeneration will lead to long term benefit for McKean County and the other surrounding counties.

Very truly yours,

Commissioners

John C Egbert

Clifford D Lane

Bruce C Burdick

McKean County Planning Commission

17137 Route 6
Smethport, PA 16749
Phone: (814) 887-2348
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August 25, 2006

Allegheny National Forest
Forest Plan Revision
P.O. Box 36
Warren, PA 16365-0847

Dear Sir:

The McKean County Planning Commission submits the following comments on the proposed Alternative C for the Land and Resource Management Plan Revision.

Recreation and Special Areas

1. Wilderness Study – We do not agree with the proposed Alt. C as presented. We do not support the designation of Tracy Ridge and Chestnut Ridge for Wilderness Study areas. Tracy Ridge is already designated as a National Recreation Area (NRA) and needs no other designation. It is protected as a remote area that emphasizes dispersed recreation.
2. Willow Bay is an important developed recreation area and we recommend that this area be expanded, not decreased, in size. We also recommend that the proposed study on recreation development along the shoreline of the Allegheny Reservoir include a specific focus on additional developmental opportunities at Willow Bay.
3. Opportunities for a resort, cabins, and marina expansion should be explored. The potential of a Wilderness designation for Tracy Ridge would exclude key areas from consideration, limit access and economic opportunities for recreational development.
4. There are already 8,979 acres of designated wilderness within the ANF versus 1,040 acres for developed recreation. Studies indicate only 2% of the public seeks wilderness recreational opportunities versus 33% who seek developed recreation.
5. Alt. C impacts connectivity for recreation. Establishing connections to the surrounding communities needs to be an action item within the Plan through trail development, recreation corridors and links to services.
6. We concur with the Equestrian riding recommendations. We strongly support planning that provides for both non-motorized and motorized recreation. It must include building connectivity to trail systems both internally and adjoining the National Forest, as well as, with communities in the vicinity of the Forest.

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7. We do not support the elimination of the Westline Intensive Use Area (IUA) or the decrease in size of the Marshburg-Stickney IUA. Westline is a destination for tourists and eliminating the connection to the community would have a negative economic impact on business in the village. We recommend that the alternative still provide a link to the community. The Marshburg-Stickney IUA should be expanded to provide a link to the Tack's Corners area along US Route 219. Currently the Seneca Highlands Snowmobile Association is attempting to secure legal trails from Smethport to the ANF. We would recommend that the ANF consider connectivity and trail linkages to other public and private lands.

(ES-32) Scenery

1. This topic mentions a new Forest Service Scenery Management System that will be applied across the ANF. We feel that the set of guidelines should include policies to protect the view shed of established scenic byways and recreation venues in the Forest. We recommend that the guidelines for road development be set within the forest to improve and retain existing view sheds and that new road construction be designed to consider impacts on the view shed and provide mitigation measures to assure that they are not degraded or destroyed.

Vegetative Management:

1. We support the goals stated in Alt. B versus Alt. C. Alt. B provides the largest suitable acreage for timber management, and directs up to 20% of the forest into uneven aged management. We need a healthy forest that continues to produce timber for harvesting. This will also enhance wildlife habitat diversity. The timber industry provides a good number of primary and secondary jobs (more than 1300) in this region. The annual economic contribution of the forestry sector in McKean County is \$33 million. The annual economic contribution of the wood products and paper sector in McKean County is \$42.4 million (Source: Penn State Timber Market Report; 1993). The forecast of a decline in a total number of jobs of 275 and a projected loss of labor income of 10 million dollars under Alt. C versus Alt. A. is not the direction that we would want to proceed towards.

2. We support Alt. B over Alt. C for Allowable Sale Quantity (64.9 MMBF/year) for timber harvesting. This alternative would go further in the effort to provide the timber needed to support the economy and business needs of the area. In the past, from 2001 to 2005, the ANF has only offered an average of 20.7 MMBF per year, which is way below the capacity of the Forest. In order to obtain the greatest economic value from the timber, it must be harvested at the proper time. In addition, the Forest must be managed for sustainability of the timber resource, which does include allowing an adequate amount of harvesting to assist with regeneration.

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(ES-33)

1. The statement that "Recreation activity on the ANF is not expected to substantially increase" does not take into consideration the current trends in outdoor recreation. Tourism is now the second largest industry in Pennsylvania. The State's PA Wilds initiative has already increased visitation to this area. The focus of that State promoted program is outdoor recreation, as presented in the DCNR Recreation Plan for State Parks and State Forests (May 2006-Fermata). We recommend that the ANF revisit this section of the Plan and reword this sentence.

Habitat Diversity

1. We concur with the designation of riparian corridors for the improvement of water quality, wildlife, aquatic plants and animals. In addition, we support a connected approach, or linkages, between habitat areas to improve wildlife diversity.

Thank you for the opportunity to comment on the ANF Land and Resource Management Plan Revision. We commend you for your efforts in undertaking this important project.

Sincerely,

Deborah L. Lunden

Deborah L. Lunden,
Director

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Commissioners of Warren County

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204 FOURTH AVENUE

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Fax (814) 728-3479

August 28, 2006

Kathleen Morse, ANF Supervisor
Allegheny National Forest
222 Liberty Street
Warren, PA 16365

Dear Ms. Morse:

Please receive and review the accompanying 28 page, 22 point document as the official response from Warren County. Thank you.

Yours Sincerely and Respectfully,

A handwritten signature in black ink, appearing to read "John R. Bortz, Jr.", is written over a horizontal line.

John R. Bortz, Jr.
Chairman,
Warren County Commissioners

Proposed Response to the Allegheny National Forest
Plan Alternative "C"

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COMMENTS**PROCEDURE**

(1) The Federal Land Policy and Management Act and 36 C.F.R. §219.9 require that local government agencies be provided with an early, frequent, and adequate opportunity to be involved during all stages of the planning process.

Page 2 of the Draft Environmental Impact Statement outlines the type of involvement that was allegedly afforded to local government agencies. These activities document “public involvement” in the planning process and do not meet the legal requirement to afford local government agencies a distinct “government to government” means of involvement.

In reality, local government agencies were not adequately involved in the planning process until several years after initial planning activities began in 1997 and resumed in 2003. Local government officials did not have any distinct forum for input into the plan until after the Need for Change items had been developed, the Notice of Intent had been published, and public workshops had been conducted to develop initial draft alternatives.

Local government agencies were not given the opportunity to be distinctly recognized and involved in the planning process until April of 2005 when Forest Supervisor Geoff Chandler began convening meetings of county commissioners, township supervisors, and school boards.

At the 2005 Spring meeting for the Allegheny Hardwood Utilization Group, Fred Norberry, the Deputy Chief for National Forest System Lands, stated, in response to a question, that local government agencies should be involved in the planning process no

less than two years before the notice of intent to change the Plan is filed. Involvement at these initial planning stages is critical as information gathered to determine Need For Change items play an important role in setting the parameters for the plan revision and in crafting the initial draft alternatives.

Mr. Norberry's comments accurately affirm that the lack of early, frequent, and adequate opportunities for local government agencies to be involved in this particular plan revision is a violation of both federal law and the Forest Service's own policy/operating procedure.

During the winter of 2005-2006, 19 local municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts adopted similar resolutions outlining 12 management goals and objectives for the Allegheny National Forest. These resolutions marked the first time during the current plan revision process that these local entities provided official input regarding the management of the Allegheny National Forest.

Also, beginning in late 2005, the commissioners from Elk, Forest, McKean, and Warren counties began a regular series of meetings with top ANF staff to learn about the planning process and begin to provide input to ANF staff.

This considerable level of response evidences a clear desire on the part of local government entities to participate in the process and indicates that had the Code of Federal Regulations and the Forest Service's own policy/operating procedure been followed in respect to local government involvement, a large number of local government agencies would have enthusiastically participated in the planning process in the initial stages (before the finalization of Need for Change items) and consequently would have

been afforded the opportunity to affect the scope of the plan revision and the content of the draft alternatives.

Therefore, because local government agencies were deprived of their right to participate in the planning process as required by law and the Forest Service's own policy/operating procedure, the Proposed Plan must be rescinded and the planning process renewed to allow local government agencies early, frequent, and adequate opportunity to be involved during all stages of the planning process.

2) There are 3 Local Development Districts (LDD's) of the Appalachian Regional Commission (the Northwest Commission, the North Central Commission, and the Southern Tier West) within the boundaries of the Allegheny National Forest that are federal agencies recognized as regional experts with regard to economic development. Each of these 3 LDD's adopted similar resolutions (2 unanimously and 1 with a single dissenting vote) during the winter of 2005-2006 that outlined 12 desired goals and management strategies for the Allegheny National Forest.

The Code of Federal Regulations specifically allows the Forest Service to include these entities as agents during the planning process and, given the expertise of these federal agencies, they should have been intricately involved in the planning process. However, these LDD's were not provided with an adequate opportunity to participate in the process, and the Proposed Plan (specifically the preferred alternative C) indicates that the resolutions passed were in great part ignored by the Planning Committee. Therefore, the Proposed Plan must be rescinded and begun anew so that these agencies can be given an adequate and early opportunity to significantly participate in the planning process as expert agencies.

3) The Proposed Plan follows a national model of forest management. While this model may be effective for managing other national forests, it is not an effective model to manage the Allegheny National Forest because, as stated on numerous occasions by ANF officials, there are unique characteristics associated with the Allegheny National Forest that simply are not present in other National Forests throughout the country.

For example, 93% of the subsurface rights are privately owned, which differs from any other National Forest in the country. Additionally, the Allegheny National Forest grows hardwood species of a quality and value not found in any National Forest in the country. Due to these unique attributes associated with the Allegheny National Forest, a national management model that does not take into account these characteristics should not have been implemented to develop the Proposed Plan.

Rather, a management strategy that takes into account the distinctive features of the Allegheny National Forest needs to be implemented in order to ensure that the benefits (economic and otherwise) associated with these distinctive features are maximized to the greatest extent possible. Therefore, the Proposed Plan must be revised and a new plan must be formulated based on a model of forest management that takes into account the unique characteristics associated with the Allegheny National Forest.

4) The Federal Land Policy and Management Act, the National Forest Management Act, and the Code of Federal Regulations require that federal land use plans be coordinated with and be consistent with local plans. These provisions also require that local plans and policies be considered during the planning process and that adequate consideration be given to the impact of the Proposed Plan on the local economy and

culture. Despite these requirements under federal law, there is little evidence that local plans were considered to any great extent during the planning process.

For example, page 97 of the 2005 Warren County Comprehensive Plan Update (WCCPU) specifically calls for the development of a resort at the Kinzua Reservoir near the Kinzua Beach area. Additionally, pages 98 and 99 of the WCCPU recognize the shortfall in timber harvesting and specifically call for increased timber harvesting in order to generate needed revenue for local economies. Last, page 99 of the WCCPU recognizes the lack of an adequate communications infrastructure and the need for an improved infrastructure in all areas of the county.

The federal mandates cited above require that the Proposed Plan be coordinated with and consistent with the WCCPU to the greatest extent possible. The WCCPU was drafted over a 5 year period, commencing in 2000, that included considerable public input and coincided with the time period during which the forest plan revision took place. However, there is no record of any inquiry by the ANF regarding collaboration with Warren County planning staff as the forest plan revision process took place and the proposed revised plan does not contain any Plan Objectives that are compatible with the specific recommendations of the WCCPU referenced above.

Specifically, the Proposed Plan in great part ignores the WCCPU by not listing a Plan Objective and/or new Management Areas that would support increased opportunities for highly developed recreation, by not including a Plan Objective to address the shortfall in meeting the ASQ harvests allowed in the previous plan (e.g. a “departed harvest schedule”) which would increase much need timber harvesting, and by precluding the construction of communications towers in 13 of the 15 management areas.

The WCCPU explicitly articulated the county's displeasure with the lack of local input regarding management of the ANF by stating that, "Although both the Kinzua Dam/Allegheny Reservoir complex and the ANF are located in Warren County, there is little local input into the development, or operation of these resources - resources important for local recreation opportunities and for economic development. This should, and must, change."

These sentiments appear to have been ignored by the ANF.

The above federal laws also intimate that local goals and objectives are to be taken into account during the planning process and that the Proposed Plan should reflect these local goals and objectives to the greatest extent possible. However, the Proposed Plan, and specifically the preferred alternative C, evidences the fact that the local goals and objectives with regard to the management of the Forest were in great part ignored during the planning process.

For example, during the winter of 2005-2006, 19 local municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts adopted similar resolutions outlining these entities' goals and objectives with regard to the management of the Allegheny National Forest. The resolutions called for a comprehensive shoreline management strategy and increased recreation around the shoreline, which is simply not present in the Proposed Plan. This is merely one example; the resolutions generally covered 12 points or objectives. While these resolutions are not local land use plans, they do provide clear evidence of the local intent with regard to the

management of the Forest, and they should have been given proper consideration by the Planning Committee.

These resolutions are cited in the Draft Environmental Impact Statement, but the Proposed Plan, and specifically the preferred alternative C, simply ignores these resolutions to a great extent. Because local land use plans and local goals and objectives with regard to the management of the Forest were ignored, the Plan must be revised so that, as required by federal law, the local plans and the goals and objectives of local government entities are given greater weight in the development of the Forest Management Plan.

5) 36 C.F.R. §219.10 states that, "Sustainability, for any unit of the National Forest System, has three interrelated and interdependent elements: social, economic, and ecological." As such, each these elements should be given considerable weight throughout the planning process, and the Proposed Plan should adequately analyze each element.

The Proposed Plan and accompanying Draft Environmental Impact Statement contain an in-depth and long range (through 2060) ecological analysis. However, the socioeconomic analysis is short term and rudimentary at best. Moreover, the informative and analytical materials made available to the public contain significant quantities of material concerning the ecological analysis and very little material concerning social and economic matters. For example, the Proposed Plan is fundamentally flawed because it does not adequately consider the economic impact relative to the increase in oil and gas development that will inevitably occur in the Forest during the lifespan of the Plan. Also, the Proposed Plan does not take into account local and regional economic and

demographic trends to an extent necessary to drive the plan in a direction that intends to benefit local economies to a greater extent.

This lack of analysis makes it impossible to have appropriate discussion of the social and economic issues and coordinate a response with local and regional agencies charged with the economic well being of forest communities. This inadequate analysis of the social and economic issues, especially in contrast with the ecological analysis, is inconsistent with the requirements contained in the Code of Federal Regulations. Therefore, the Proposed Plan must be rescinded and revised so that it comports with the Code of Federal Regulations by providing a long term, in depth analysis of the socioeconomic impact of the Proposed Plan.

Timber

6) The preferred alternative C sets the Allowable Sustained Quantity (ASQ) for timber harvesting at 56 MMBF per year, a figure that is 41% less than the ASQ of 94.5 MMBF per year set by the 1986 Plan and 59% less than the allowable harvest of 137 MMBF per year that was present in 1975 Functional Timber Management Plan. The economic analysis in terms of projected number of jobs, the amount of revenue derived by local municipalities and school districts, etc. are all based on timber harvesting at the proposed rate of 56 MMBF per year.

However, at public forums to explain the content of the draft alternatives, the Planning Committee has admitted that, due to current budgetary constraints, it is not possible to harvest the 56 MMBF ASQ per year proposed by Alternative C. The proposed ASQ is based on an approximately 40% increase in budget, yet the Proposed Plan contains no evidence that this increased funding will occur or from where it will

come. Based on the historic and current budget data, an annual harvest volume of 25-30 MMBF per year is a realistic harvest for the ANF.

Given the uncertainty associated with the budget that will be available, the Proposed Plan must be rescinded and revised so that it adequately sets forth a credible socio-economic scenario based on historic budget allocations (e.g. the last 5 years adjusted for inflation) and rational projections of future budgets as permitted by the National Forest Management Act. Further, alternatives to traditional budget and management tools, including stewardship management contracts, must be proposed in any revised plan alternatives.

7) The Proposed Plan creates the appearance that a healthier and more balanced age forest is being created by simply changing the age designations that were present in the 1986 Plan. However, the fact remains that the timber growth rate far exceeds the harvest rate on the Allegheny National Forest. Due to the budgetary realities cited above, it is virtually assured that the timber management required to maintain a healthy forest of the age designation targeted in the plan will not be possible. The forest will more than likely become much older than envisioned in the forest plan and suffer increased timber mortality, particularly among species with a shorter life span. This will have profound ecological and economic impacts not adequately addressed by the Proposed Plan.

For example, black cherry is currently the highest valued species of commonly traded and domestically produced hardwoods nationwide. The value of black cherry has nearly doubled over the past ten years, with its value in 2004 being \$3,000 per thousand board feet of stumpage. The Allegheny National Forest contains nearly 25% of the

nation's total inventory of black cherry sawtimber. Black cherry is the leading species in sawtimber volume on the Allegheny National Forest, comprising over 1/3 of all growing stock. Since 1986 the demand for timber from the Allegheny National Forest has increased dramatically, in great part due to the high value of black cherry.

These facts indicate that, for obvious economic reasons, black cherry should be harvested to the greatest extent possible, while still retaining the ecological diversity and integrity of the Allegheny National Forest. Nevertheless, due to the reduced ASQ proposed in Alternative C and budgetary constraints that call into question the feasibility of implementing timber harvests forecasted under Alternative C, it is likely that significant quantities of older black cherry trees will die before they can ever be harvested.

Black cherry, which became established as a significant species on the ANF in the early 1900s, has reached physical maturity across the ANF and is already beginning to experience increased natural mortality. In addition, overly mature trees are falling victim to disease (such as red rot) and wind damage.

However, because of the proposed ASQ in Alternative C and budgetary constraints, unhealthy conditions now emerging in those stands of overly mature black cherry will accelerate. As these trees fall they pose risks to other healthy trees, become fuel for forest fires, and present a danger to recreational users of the forest. In addition, the unusually high monetary value of these trees is needlessly wasted.

In sum, the Proposed Plan's reduced rate of annual harvest will not keep pace with the annual growth and normal mortality of timber on the ANF, which will result in thousands of acres of timber being left to rot on the stump. To combat these deficiencies

in the Proposed Plan, the Plan must be rescinded and revised to more adequately address the potential problems associated with an aging forest (the effect on timber harvesting, the risk of fire, the risk of disease, and other catastrophes associated with an aging forest) and to specifically allow for a rate of harvest exceeding the proposed ASQ that will prevent the unnecessary waste of the valuable timber resources and attendant negative ecological and economic consequences.

- 8) Many reputable foresters familiar with the ANF recommend that a forest should contain an equal balance between late successional habitat and early successional habitat. Nevertheless, the preferred alternative C proposes 28-32% late successional habitat, only 8-10% early successional habitat, and creates five times more late successional habitat than alternative A.

The current amount of early successional habitat serves as an indicator for the amount of mature timber that will be present at a later date. Therefore, if the preferred alternative C is adopted, a decreasing amount of early successional forest will be present, which will ultimately lead to an inadequate amount of mature timber at a later date.

This lack of mature timber will have a substantial adverse impact on the overall health and diversity of the Allegheny National Forest and in particular upon species of wildlife that require early successional habitat. Early successional habitat is the preferred habitat for a number of wildlife species including grouse, woodcock, and rabbits. As the amount of early successional habitat decreases, so does the prevalence of wildlife species that are dependent upon this habitat. Accordingly, the preferred alternative must be rescinded and revised so that, as recommended, there is a more equal balance between late successional habitat and early successional habitat.

It should also be noted that the indicator wildlife species selected for analysis in the Draft Environmental Impact Statement in great part require late successional habitat, thereby justifying the increased amount of such habitat proposed under alternative C. If different species had been selected (e.g. grouse, woodcock, rabbits, etc.), the conclusion could have just as easily been reached that more early successional habitat is required. In other words, it appears as though an unbalanced set of indicator species were selected, which skews the analysis of habitat types to be promoted through active vegetation management.

The Draft Environment Impact Statement, using the viability outcome scale as it applies to the 77 indicator species, also indicates that none of the four alternatives will have a significant impact on species diversity. Therefore, given that an increase in the amount of late successional habitat is not necessary for continued species diversity, the Proposed Plan must be rescinded and a preferred alternative must be created which puts more emphasis on the creation of early successional habitat and creates an equal balance of early successional and late successional habitat. It should also be noted that such an alternative would not have a significant impact on the amount of late successional habitat because, due to the reality of under-harvesting caused by budgetary constraints, the goal for achieving an adequate level of late successional habitat will still be met.

9) Oak trees in the Allegheny National Forest are not being managed or regenerated effectively due in part to the management strategies that are implemented where these trees are located. Oak trees will not regenerate absent active management.

There are approximately 70,000 acres of forest populated with oak trees in the Allegheny National Forest. Roughly 35,000 of these acres are in areas that preclude the effective

management of oak trees. It is acknowledged that the landscape/topography of some areas where many oak trees are located is not conducive to timber harvesting. However, this only increases the importance of designating those areas where harvestable oak trees are present as management areas that permit adequate harvesting and regeneration of the species.

Specifically, a large percentage of these acres are in Wilderness Areas, Remote Recreation Areas, or National Recreation Areas where harvesting is administratively prohibited. As a result the oak trees in these areas will not be managed for regeneration. As a consequence, under proposed plan Alternative C, the oak tree population within the Allegheny National Forest will decrease dramatically.

This result in turn will have significant adverse ecological and economic effects. Next to black cherry, oak is the most valuable species of saw timber on the ANF. A reduction in this timber species will clearly lead to a loss of economic value.

In addition, acorns produced by oaks are an important food source for deer and turkey. A decrease in this food source for deer could lead to further over browsing on tree saplings, which has been a serious, well-documented impediment to the regeneration of many species of trees on the ANF and could adversely affect the carrying capacity of deer and turkeys on the ANF.

The end result for management of oak trees under proposed plan Alternative C is that oak trees will no longer be managed in a manner that results in optimal ecological and economic benefits associated with these trees. Therefore, the Proposed Plan must be rescinded and revised so that areas where large quantities of oak trees are present and

where harvesting is possible are designated as management areas that ensure adequate harvesting and regeneration of oak species.

10) The ANF's 1995 Timber Resource Capability Study projected that the current sustainable harvest should be approximately 53 MMBF per year. The Study also indicated that the sustainable harvest could be as high as 72 MMBF per year, if upland hardwoods could be adequately regenerated. Through adaptive management strategies and improved upland hardwood science, reputable foresters believe it is possible to adequately regenerate upland hardwoods. Therefore, the Proposed Plan must be revised so that the preferred alternative proposes an ASQ of at least 72 MMBF per year, and not 56 MMBF per year.

11) The amount of revenue generated from timber sales in the Allegheny National Forest is an important revenue source for local municipalities and school districts. The projected annual timber receipts for the next two decades are considerably lower under proposed plan Alternative C than either Alternative A or Alternative B (\$107.5 million, \$137.8 million and \$130.2 million, respectively). Alternatives A and B would, accordingly, yield approximately \$1 million per year more revenue under the traditional 25% revenue sharing program.

Aside from this direct economic impact on local governments, Alternatives A and B also are projected to sustain more employment from forest activities than Alternative C.

The four counties that comprise the ANF are in a state that is among the lowest of performers in economic growth, are within a region of the state that is the lowest performer in economic growth, and themselves are at the lowest rungs of performance in

the region. In fact, Forest County is currently designated as a “distressed county” by the Commonwealth of Pennsylvania and Warren County has led the state in recent years in net job losses.

The National Forest Management Act requires the Forest Service to draft its management plans in the context of a current analysis of local economic and demographic factors. Based on this analysis, “attention should be paid to the uses, values, products, or services that the Forest Service is uniquely poised to provide”. As stated above, the ANF is unique among national forests in terms of the value of timber and the impact that the sale of that timber can have for the economies of the forest communities.

Given this dire economic situation and the potential of the ANF to provide substantial economic benefits to its host communities, special consideration should be made to promoting uses of the forest that maximize the economic benefit to the communities within the ANF in a manner consistent with other multiple use objectives. Alternative C is unacceptable from this stand point and the proposed plan must be revised to yield a greater economic benefit for the communities of the ANF.

12) Reports indicate that uneven-aged management practices are more costly than even-aged management. Additionally, even-aged management allows for higher retention of Allegheny Hardwoods, which are the most profitable species for timber harvesting in the Allegheny National Forest. Moreover, research has shown that, given high deer densities on the Allegheny National Forest, it is simply not possible to implement an uneven-aged management system without costly and intrusive measures such as fencing.

Alternative A proposes a much higher level of even-aged management than alternative C (92% vs. 60% respectively), and it also de-emphasizes uneven-aged management to a greater extent than alternative C (less than 1% vs. 25% respectively).

Therefore, the Proposed Plan must be rescinded and revised so as to emphasize even-aged management to the greatest extent possible in order to cut costs, ensure the proliferation of the most profitable tree species in the Allegheny National Forest, and to minimize the adverse effects of over browsing by deer.

- 13) The Multiple Use and Sustainable Yield Act requires that the Forest Service maintain a "sustainable yield" with regard to timber harvesting and management.

The ASQ set forth in the 1986 Plan was 94.5 MMBF per year. The ANF's 1995 Timber Resource Capability Study indicated that the sustainable harvest could be as high as 72 MMBF per year. However, from 1986 to the present, less than half of the permissible board feet have actually been harvested. Now the preferred alternative C further reduces the ASQ to 56 MMBF per year, and it is likely that, due to budgetary constraints, the actual amount of timber harvested will be in the 25-30 MMBF per year range for the duration of the planning period.

Given that the ANF's own studies demonstrate that considerably higher sustainable yields are possible than either proposed plan Alternative C or budgetary constraints will allow, the Forest Service will not maintain a "sustainable yield" as required by the Multiple Use and Sustainable Yield Act. Therefore, in order to comply with federal law, the Proposed Plan must be rescinded and revised so that the amount of timber harvesting is sufficient to maintain a "sustainable yield".

OGM

14) The Proposed Plan designates certain management areas as Wilderness Study Areas or Remote Recreation Areas, which would normally preclude road development and timber cutting in those locations. However, in those same areas, a vast percentage of subsurface rights are privately held, which will likely lead to further road development and related timber cutting as oil and gas exploration proceeds. The Plan does not address how to reconcile this paradox in any meaningful way.

Appendix F of the Proposed Plan projects that as much as 301,000 acres (58.7%) of the 513,000 acres of the ANF, where the mineral rights are privately owned, may be under development for oil and gas production within the next 15-20 years. Overall, 93% of the subsurface rights within the ANF are privately owned and oil and gas production in the ANF currently stands at 6.5 million barrels of oil per year and 20 BCF of natural gas per year.

The Proposed Plan projects that these figures will increase to 8.7 million barrels and 28 BCF annually. Given dwindling oil and gas supplies elsewhere in the world, there is a possibility that these projections may in fact be surpassed, which will lead to even more road development and a significant amount of permanent timber removal within areas designated as Wilderness Areas or Remote Recreation Areas. All of the above will preclude effective implementation of the desired Plan conditions along with the management goals and objectives associated with these management areas.

For example, the Forest Service manages approved Wilderness Study Areas to "preserve wilderness values," which simply is not possible if oil and gas development occurs.

Therefore, the Proposed Plan must be rescinded and revised so that those proposed Wilderness Study Areas where the United States does not own the mineral rights are eliminated for consideration as Wilderness Areas. Further, Standards and Guidelines must be reinforced, where legally permissible, to protect ANF surface resources to the maximum extent (e.g. Guidelines reworded to state "must" for requirements rather than "should").

15) Oil and gas development provides a significant and positive economic impact to local communities and employs more local citizens than even timber harvesting. Jobs directly related to oil and gas production within the Allegheny National Forest are estimated to be 1,321 and are projected to reach more than 1,800 at the mid-point of the planning period; labor income related to oil and gas production is currently at \$42 million annually and is projected to increase to \$58 million annually by the mid-point of the planning period.

Despite the inevitable oil and gas development and the economic benefits associated with such development, the preferred alternative C designates areas where there are known to be large quantities of oil and gas deposits as non-motorized Remote Recreation Areas or Wilderness Areas. Such a plan sets into motion a fundamental conflict between the rights to remove the privately owned oil and gas and the usage limitations inherent in Wilderness and non-motorized Remote Recreation Areas.

For example, the Proposed Plan includes a new type of management area, a Remote Recreation Area where no motorized activities are permitted. This management area overlies a future oil and gas development zone, which means that future management actions associated with remote recreation in this area will be in conflict with oil and gas development.

However, there is no discussion of how management actions might be employed to accommodate development of subsurface rights in a manner that meets the social, economic and ecological goals of the Plan. For instance, the Plan acknowledges that the increased level of subsurface development will likely bring results such as soil compaction and significant increases in road development. The Plan fails to actually analyze the consequence of these impacts.

As noted above, the non-motorized Remote Recreation and Wilderness Areas are advanced as though subsurface consequences and their attendant impacts did not exist. Also, the Plan fails to consider how the subsurface consequences might be used as opportunities for alternative management objectives. For example, the Plan fails to consider that areas subject to significant surface disturbance due to oil and gas extraction might subsequently be appropriate areas for motorized or other recreation activities.

The Proposed Plan must be rescinded and revised so that it recognizes that oil and gas development is going to occur, acknowledges the conflict that such development will create, and emphasizes the economic benefits of such development. Additionally, all management areas in the Proposed Plan that overlay potential oil and gas development zones that conflict with planned management goals must be modified to include resource management objectives compatible with active oil and gas development.

RECREATION

16) Since the creation of the original ANF Forest Plan in 1986, fundamental changes in the economy have led state and local officials to recognize the need for increased tourism development to sustain rural economies. Both the Warren County Comprehensive Plan and a state initiative called the Pennsylvania Wilds call for the heightened significance of tourism development as a means to bolster local and regional economies. The Pennsylvania Wilds effort identifies the ANF as one of the premier tourism resources in the region – indeed, the ANF is the only National Forest in the Commonwealth of Pennsylvania and the rugged beauty of the Kinzua Reservoir offers unrivaled fresh water recreation and solitude.

However, a study being conducted by the Warren County Visitors' Bureau contains preliminary findings that conclude that the ANF is currently not bringing visitors to the area to an extent needed to sustain meaningful tourism development

Local officials have made the case numerous times that the ANF will simply not support a thriving tourism industry without more opportunities for highly developed recreation, lodging and supporting services and amenities. A plan commissioned by Warren County in 1963, authored by the Simmonds and Simmonds group, provided a detailed analysis of tourism opportunities on the ANF centered around the Kinzua Reservoir. Very few of the recommendations in the Simmonds plan were implemented.

In 1986 local officials retained the Stormstown Group to determine the feasibility of a resort facility on the ANF. That study, as well as a subsequent study by Gannon University MBA candidates, found that a resort facility could be sustained and would

provide positive economic impact to the region. Although supported by the ANF Supervisor, the resort proposal was rejected by the Regional Forester for procedural reasons.

Since beginning to meet with the ANF planning team in 2005, the Warren County Commissioners have repeatedly made the case that more highly developed recreation, lodging, and other facilities targeted at attracting visitors are critically needed on the ANF. However, the Desired Condition stated in the Proposed Plan does not envision anything other than the status quo regarding use of the forest by visitors. Consequently, the Proposed Plan contains no Objectives or changes in Management Areas that would support anything other than a continuation of current uses of the forest and certainly no advancement toward providing additional opportunities for highly developed recreation and lodging. Not one additional acre of the ANF has been made available to meet the needs local officials see for tourism development. Yet, the Proposed Plan creates new “Remote Recreation” management areas and “Wilderness Study” areas, together comprising over 44,000 acres.

Due to this imbalance in recreational uses, lack of responsiveness to local officials as well as incompatibility with local and regional planning efforts pertaining to tourism development, the Proposed Plan must be revised to state a Desired Condition that envisions enhancement of the entire range of opportunities for visitors to enjoy and make use of the ANF, particularly in terms of highly developed recreation and lodging. In addition, plan Objectives must be created to support the Desired Condition and, most importantly, additional Management Areas (MA 7.1) must be identified in the Proposed Plan that would support new uses attuned to tourism development, particularly in the

vicinity of the Kinzua Reservoir. Merely stating that the ANF will conduct a recreation study *subsequent* to adoption of the Final Plan does not serve as a proxy for what should be in the Plan. Rather, the to-be-conducted study should add the detail necessary to move toward implementation of Objectives and examine site specific uses within Management Areas already determined by the Plan.

17) The Pennsylvania Wilderness Act of 1984 (16 USC § 460qq) designated approximately 23,100 acres as the Allegheny National Recreation Area (NRA). The Act required the Forest Service to prepare a management plan for the use of the NRA which could be “prepared in conjunction with, or incorporated with, ongoing planning for the Allegheny National Forest”. ANF officials have acknowledged that, some 22 years later, such a plan required by Congress has never been developed for the Allegheny NRA. Even now, as the opportunity has occurred for a management plan to be written “in conjunction with” the forest plan revision, no plan for the NRA has been developed. Instead, the Proposed Plan contains a single management Objective for the NRA – to “write a specific management plan for the NRA *within five years*” (emphasis supplied). This is an unacceptable violation of the Pennsylvania Wilderness Act.

For 22 years, users of the ANF have had their right to use the Allegheny NRA (MA 8.2) unilaterally dictated by the Forest Service, without any public involvement in creating a management plan for the NRA. As a result, although the Pennsylvania Wilderness Act does not explicitly prohibit certain forms of recreational use in the NRA (e.g. snowmobiling), the ANF has imposed its own restrictive management regimen in the absence of the legal required management plan.

Moreover, conversion of existing NRA acreage (i.e. Tracy Ridge) to Wilderness Study Area without ever having created a management plan for the NRA is not acceptable. Without the benefit of having the NRA managed to maximize the beneficial use of the area for all forms of recreation, as Congress intended, the Forest Service proposes through the plan revision to potentially further restrict use of these public lands by managing them as Wilderness.

This unacceptable situation must be corrected by revising the Plan to incorporate a full management plan for the Allegheny NRA. Waiting until *after* adoption of the revised Forest Plan to create a management plan for the NRA and in the mean time converting part of the NRA to a Wilderness Study Area only furthers the illegal status of the Forest Service's management of the NRA.

18) The 1986 Forest Plan envisioned that the ATV/OHV trail system would grow to 350 miles. This has not occurred and instead the trail system consists of just 108 miles of trails, inadequately sized trail head areas, and a lack of connector trails to link motorized recreation to gas stations, lodging, restaurants, and other commercial services that would magnify the economic impact for local economies.

Many local restaurants and other businesses within easy reach of the motorized trail system have closed in recent years that could have thrived if trail connectors were in place. In addition, during periods of heavy use motorized trail users frequently are forced to park along highways, leading to unsafe conditions due to undersized trail head areas.

Moreover, in a manner atypical with other national forests, snowmobiles have been unduly restricted to a trail system that does not include fuller use of forest roads and right of way areas that would not be suitable for other motorized uses. In most respects,

snowmobiles seem to be treated as if their impact on the forest is similar to ATV and OHV use when that is clearly not the case.

In recent years, ATV/OHV and snowmobile use has become an increasingly popular form of recreation in the Allegheny National Forest, with revenue from ATV permits totally approximately \$221,790 in 2003, \$243,260 in 2004, and \$210,750 in 2005. ATV/OHV and snowmobile use has a much greater economic impact on local communities than non-motorized recreation. For example, the Allegheny National Forest data estimates that the direct economic impact to the Allegheny National Forest four county area from this use is \$17 million annually.

In recognition of this economic benefit, the 12 Point Resolutions adopted by 19 municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts echoed the 1986 Forest Plan's desire to create additional ATV trails within the Intensive Use Areas on the Allegheny National Forest. While short of the 350 miles as expressed in the 1986 plan, the 12 Point Resolution called for ATV trail mileage to be increased to 300 miles, an amount that would nearly triple the current system's capacity.

Despite the Proposed Plan's Goal of increasing the "quality and quantity of motorized trail riding opportunities", this Goal is not supported by the Proposed Plan Alternative C, which actually reduces both the number of Intensive Use Areas available for ATV/OHV trail development and reduces the total number of acres in those areas.

Conversely, the Proposed Plan states that an increase in non-motorized recreation is not expected to occur during the planning period, yet the Preferred Alternative C designates tens of thousands of acres as Remote Recreation and Wilderness Study areas,

which are only conducive to non-motorized recreation. Also, as stated above, no management plan exists for the Allegheny NRA and motorized recreation has been arbitrarily restricted in the NRA by the Forest Service on these 23,100 acres.

The Proposed Plan must be revised to specifically state a Desired Condition, Goals, and Objectives, that support increased motorized recreation on the ANF by making additional acreage available for trail development and changing Standards, Guidelines, and other elements of the Proposed Plan, including those pertaining to the Allegheny NRA, to allow increased use of forest service roads and right of way areas for snowmobiles. In addition, trails heads must be enlarged and designated as M.A. 7.1 to permit additional, specially designed facilities to be sited at trail heads that benefit equine, snowmobile, and ATV/OHV users.

19) In recent years a number of competitive events have developed and continue to increase in popularity for which the ANF is an extremely attractive venue. These events include cross country skiing, snowshoeing, dog sledding, mountain biking, road biking, triathlon, and adventure race competitions. It has been the experience of local event organizers that the vast majority of competitors for these events travel from outside of the region and create a positive economic impact and more exposure to support tourism promotion of the ANF.

Portions of the Proposed Plan that prohibit special use permits for competitive recreation events must be revised to allow for the issuance of special use permits for *non-motorized* competitive recreation events in all management areas. Otherwise, established events, such as the Kinzua Country Tango held in part in an area to be designated as

Remote Recreation, will be jeopardized and the ability to develop new events will be significantly curtailed.

OTHER

20) It has been evident that the federal government has not made the financial resources available to effectively manage the entire acreage contained in the Allegheny National Forest, as shown by the inability of the ANF to complete scheduled timber harvests and the deterioration of ANF recreation facilities and forest roads. The Proposed Plan bears an admission of this situation by listing an Objective to “reduce backlogged and deferred maintenance by 10 percent annually”. Moreover, in order for the ANF to make the desired contribution to local economies, it is not enough to perform “maintenance”; new investments in forest infrastructure and management capabilities are needed.

Therefore, the Plan should be revised to recognize the gap between Plan Objectives and the resources available to meet those Objectives. This can be accomplished by identifying and expressing the desire to utilize alternative management tools, such as stewardship contracts, partnerships with other government agencies (in particular state and local governments), and private sector leases – all practices utilized throughout the Forest Service system – that will increase the level of resources available to the ANF.

21) Designating areas as Wilderness Areas, Remote Recreation Areas, Wild and Scenic Areas, or National Recreation Areas precludes the construction of a

telecommunications infrastructure in these areas. Currently, 13 of the 15 land use designations do not permit the construction of communications towers.

Given the current inadequacy of telecommunications service in the area and the barriers that the Proposed Plan creates for the construction of a telecommunications infrastructure, a safety issue is present for those individuals who frequent the Allegheny National Forest. Therefore, rather than modifying the Plan at a later date, the Proposed Plan must be rescinded and revised so that all management areas will allow for the construction and placement of communications towers. This will better ensure the safety of those that frequent the Allegheny National Forest and promote increased use and recreational development.

22) The National Forest Management Act requires that monitoring programs be implemented to determine how the land use plans are affecting local economies and communities that are dependent on the Allegheny National Forest. The monitoring programs are designed to determine whether local economies and community stability are adequately being protected through the planning process and actual implementation of the Plan. To our knowledge, no such monitoring plan or a codified protocol for government to government communications regarding the monitoring plan exists, nor does the proposed plan revision.

Local government agencies have specialized knowledge related to the performance of local economies that are essential to an accurate analysis of the impact of the Forest Plan. Therefore, the proposed plan must be revised to expressly provide for a formal means of ongoing government to government communication throughout the life of the Plan.

04

**HEATH TOWNSHIP
2801 PINE RUN ROAD
SIGEL, PA 15860**

Dan Leonard—Secretary-814-752-2972

SUPERVISORS

Mike Wingard (2008) 752-2577

Dan Leonard (2010) 752-2972

Mike Emery (2012) 752-2511

TO: ANF

FROM: Dan Leonard

DATE: 6-5-06

RE: 15 Year Plan

Two things that I think need addressed. 1. Please take the burden off of the Townships by making more “way more” areas for 4 wheelers. 15 years is a long time to comply with the demand, but our world wants to play and with no place to play puts a burden on those that don’t want to play but relax. People that own or rent a small lot to live on and then buy their child a 4 wheeler are setting them up for trouble in many ways.

2. Either stop the camping along the river near Belltown, Elk County or put in proper sewage facilities. And charge them a fee!!! Everyone else pays their way!!!!

Thanks for reading. Dan Leonard

MILLCREEK TOWNSHIP PLANNING COMMISSION
P.O. Box 134 - Fisher, PA 16225 - (814)764-3239

June 1, 2006

The comments herewith are from the Millcreek Planning Commission and carry the imprimatur of the Millcreek Township Board of Supervisors.

Millcreek Township is located close to the Allegheny National Forest, with significant economic and cultural ties to the Allegheny National Forest. We focus on multiple use of the resource, with the reservation that no single function within our Township—or the Allegheny National Forest—should be allowed to tilt the management plan to the disadvantage of citizen who have usufruct rights and also the responsibility to preserve the forest for future generations of American Citizens.

→ The map of “Alternative D” offers the best option to continue the Allegheny National Forest in sustainable yield and undamaged condition.

(We are aware that individuals, groups, corporations and politicians will propose, demand, claim and request changes which will give them a financial advantage or unfair use benefit. We support Forestry Professionals who will buffer the new plan from selfish or destructive changes.)

Aspects with significant impact not mentioned in the strategic plan: acid rain is capable of destroying tree species. Mercury pollution can kill aquatic species and negatively affect their biology. Overtime, there may be climate change, with first a change in precipitation. These are potentiated by the present administration's reliance on Fossil Fuel.

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The mind-set of high level politicians at this time is unlikely to change. Therefore, the final plan should have options for emergency modification when there is a catastrophic danger of this type.

Pesticides are mentioned. There never has been the elimination of imported forest insect pest in the history of American Entomology. (The Hall Scale was destroyed by burning all of the dozen palm trees on which this pest was discovered, but that was not due to pesticides.) Biological control has the track record of reducing loss to tolerable levels, or the threatened tree species was decimated or killed and chemical agents were unable to halt the damage. A Sub Rosa Agreement to avoid pesticides gives biological agents (predators and parasites) a more rapid reduction of the pest population.

Herbicides are mentioned. There are numerous scientific publications documenting the carcinogenic and/or mutagenic effects of the chemicals. See: Schurr, et AL 1990 A NEW METHOD FOR DETECTING GENOTOXIC CHEMICAL IN WATER OR ENVIRONMENTAL SAMPLES; PROC. National conference "PESTICIDES IN THE NEXT DECADE", pp 294-299. Also, Schurr et AL 1990 GENOTOXICITY OF 22 PESTICIDES DOCUMENTED BY MICROTITRATION SOS CHROMOTEST. INTERNATIONAL JOURNAL OF TOXICITY ASSESSMENT 5: pp 1-5.

Vincent Garry and seven coauthors published: 1989, 13 OCTOBER, IN SCIENCE p 251 "HUMAN GENOTOXICITY: PESTICIDE APPLICATORS" with documentation that workers spraying phosphine (and earlier sprayed other pesticides) suffered 106.6 times the chromosome breakage and genetic injury than control subjects. Since control humans are likely to never have been exposed to pesticides from food, garden, yard and farm activities, this data is conservative. If the Forest Service Employees are exposed to pesticides in their workplace, any future cases of cancer or defective offspring would leave the Forest Service liable for damages. The best alternative is to avoid use of pesticides.

Sincerely yours,



Dr. Karl Schurr, Chairperson
Millcreek Township Planning Commission

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RESOLUTION # 441

GLADE TOWNSHIP
99 Cobham Park Road
Warren, PA 16365-4464

A RESOLUTION AUTHORIZING COMMENT ON THE PROPOSED LAND
AND RESOURCE MANAGEMENT PLAN FOR THE ALLEGHENY NATIONAL
FOREST

WHEREAS, the Allegheny National Forest has published a Proposed Land and Resource Management Plan for the Allegheny National Forest; and

WHEREAS, the Allegheny National Forest has officially entered into the public comment period relative to the Proposed Land and Resource Management Plan; and

WHEREAS, the Proposed Land and Resource Management Plan presents four possible alternatives (A,B,C, and D) for public consideration; and

WHEREAS, in the Proposed Land and Resource Management Plan, the officials of the Allegheny National Forest have identified alternative C as the preferred alternative; and

WHEREAS, during the early stages as well as throughout the entire timeline of the planning process, local governments, school districts, and associated agencies were not provided with adequate opportunity for input into the planning process; and

WHEREAS, a codified system of communication relative to critical developments within the planning process, which would have fostered efficient dialogue between local governments, school districts, and affected agencies, was never developed nor implemented

WHEREAS, none of the proposed alternatives, including alternative C, sufficiently address the economic and social needs of local government entities; and

WHEREAS, in an effort to create a public response, local governments, school districts, and other interested agencies have banded together in an ad hoc format to review, assess, and address the preferred alternative C and to consider the impact of its perceived shortcomings; and

WHEREAS, the ad hoc committee recognizes the significant contributions that the Allegheny National Forest makes to local governments, school districts, and communities; and

WHEREAS, the ad hoc committee recognizes that, due to the August 28 deadline created by the Allegheny National Forest for the submission of comments on the Proposed Land and Resource Management Plan, comments must be generated and submitted in an expeditious and efficient manner; and

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WHERE AS, the ad hoc committee's concerns include, but are not necessarily limited to, alternative C's lack of adequately addressing the following issues: a departed harvest schedule for timber cutting; additional alternatives for shoreline management and developed recreation; an economic analysis considering the effect of divestiture of federally owned property within the Allegheny National Forest; the effect of oil, gas and mineral development on the forest in general, and specifically on those areas designated as potential wilderness areas; and the potential for increased motorized recreation in the Allegheny National Forest.

WHERE AS, the ad hoc committee will draft detailed comments on these issues and other issues not enumerated above prior to the August 28, 2006 deadline; and

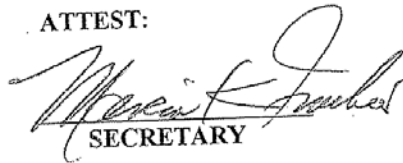
WHERE AS, the Glade Township Supervisors wish that their following comments be added to this Resolution for recognition:

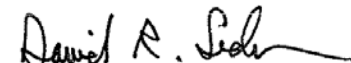
1. Go from 100 to 150 mmbf to help with the local economy.
2. That there will not be any more land approved for wilderness.
3. That there will not be any more additional ATV trails.
4. That there will not be any more additional horse trails.
5. That there will not be any resorts built on the Allegheny National Forest land.

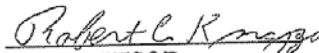
WHERE AS, the Glade Township Supervisors wishes to submit the above comments for review by the ad hoc committee.

NOW THEREFORE, be resolved that detailed comments are reserved until such time the ad hoc committee makes it final comments and the Chairperson of Glade Township is empowered to approve the submission of such comments on behalf of the Glade Township Supervisors to the Allegheny National Forest by the August 28, 2006.

ATTEST:


SECRETARY


SUPERVISOR


SUPERVISOR


SUPERVISOR

112 Bayard Rustin
P. O. Box 79
Kane, PA 16735



Phone: (814) 837-9240
Home: (814) 837-8639
FAX: (814) 837-6609

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**Doug Caldwell, Mayor
Kane, Pennsylvania**

August 23, 2006

Allegheny National Forest
Plan Revision
P.O. Box 36
Warren, PA 16365

Dear Forest Plan Team:

Please accept these comments that I gave at the ANF Management Plan public hearing held at Kane, PA on August 22, 2006.

Although I have not reviewed the entire proposed plan and do not know the technical terms included in the plan, I do have some thoughts and recommendations from an elected official's viewpoint. I would hope that those responsible for the creation and implementation of the plan will consider the economic and social impact that the Allegheny National Forest will have on the adjacent areas affected by such a plan. With the changing industrial and job picture we must focus on areas that we did not need to address in the past or were not as important as they are presently.

As an elected official, I would like to see the government get out of the forest and real estate business. One reason I don't believe the funding (which is tax monies) is made available to properly manage the real estate and the forest. That probably won't happen so I will offer a few suggestions.

The designation of any or additional acreage that has any restrictions is a mistake. The restriction of any land without any avenue for change is a possible hindrance for any future plans for development. When any economic opportunity presents itself, we in the rural areas need whatever advantage we can get to complete. The land restrictions also could have an impact on our national security in the area of technology especially the communications field if towers and/or stations are prohibited.

The revenues from the gas, oil and timber are extremely important to our area. They are directly related to our tax base which is critical, especially to our elderly. And, finally,

"Black Cherry Timber Capital of the World"

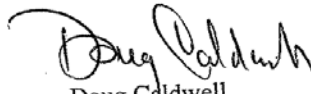
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Allegheny National Forest
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August 23, 2006

the multi use of our national forest for timbering, gas and oil production and all recreational uses is a must for all adjacent areas.

I would like to thank you for your time and I hope that you keep us in your thoughts.

Sincerely,


Doug Caldwell
Mayor

DC/lai



www.bradfordpa.org

OFFICE OF ECONOMIC AND
COMMUNITY DEVELOPMENT
20 Russell Boulevard
P.O. Box 490
Bradford, PA 16701

August 23, 2006

TDD Only: 1-800-654-5984
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Office: (814) 368-7170
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Allegheny National Forest
Forest Plan Revision
PO Box 36
Warren, PA 16365

RE: Proposed Land and Resource Management Plan

Dear Sir or Madam:

This letter serves to provide the following comments on the proposed Allegheny National Forest Alternative C Plan from the standpoint of economic and tourism development in this region. Tourism and recreation need to be recognized as an important economic factor in the forest. It appears that developed recreation has not received a priority in the Plan as presented under Alternative C, as only 1,477 acres within the 513,000 acre forest are listed as MA 7.1 for developed recreation. This is less than .002% of the forest. We support the increase in developed recreation as presented in Alternate B, which increases developed recreation to 1,772 acres. Additionally, the establishment of connections to the surrounding communities needs to be an action item within the Plan through trail development, recreation corridors and links to services.

Alternative C does not recognize or propose a plan that addresses current recreation demands and future tourism needs. There are already 8,979 acres of designated wilderness within the ANF versus 1,040 acres for developed recreation. Studies indicate that only **2%** of the public seeks wilderness recreational opportunities versus **33%** who seek developed recreational opportunities.

We do NOT support the designation of Tracy Ridge and Chestnut Ridge as presented for Wilderness Study areas. Tracy Ridge already has a National designation as a National Recreation Area (NRA) and needs no other designation. It is protected as a remote area that emphasizes dispersed recreation. It has an excellent system of new hiking trails and borders the shoreline of the Allegheny Reservoir. Opportunities for a resort, cabins and possibly marina expansion or development should be explored. The potential of a Wilderness designation for Tracy Ridge would exclude key areas from these development opportunities, limiting access and economic vitality for recreation development. The Allegheny Reservoir is the focal point for developed recreation on the ANF and is in close proximity to Interstate 86 in New York State.

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The City of Bradford is an Equal Opportunity Provider, Lender & Employer*

Allegheny National Forest
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Willow Bay is of significant importance as it currently is a developed recreation area and we recommend that this designation be expanded and not decreased as currently recommended in Alternative C. A proposed study on recreational development along the shoreline of the Allegheny Reservoir delineate developmental opportunities specifically include Willow Bay. Willow Bay presents a unique opportunity to link NY I-86 transportation corridors and is near to private land holdings that could stimulate development on non-public lands. In addition to Willow Bay, the Sugar Bay and Kinzua Beach areas should be pinpointed as study areas for future development.

Alternative C does not address the need to designate interpretive recreation areas – we support the addition of interpretive recreation areas in the forest. A study area to be developed along Chestnut Ridge as a second experimental forest laboratory for conducting research to regenerate our oak forest, with interpretive trails and the inclusion of a plan for a resource management plan that lends itself to scientific and educational demonstration areas.

Other comments on Plan:

Summary of the Draft Environmental Impact Statement- ES-27- Outline a strategy for interpretation of the Native American history of the region, along with other historic areas. Emphasize opportunities to establish educational demonstration and interpretive sites. In the summary report, only road less areas and wilderness designations areas are listed as special areas of concern.

ES-32-Scenery is only mentioned in the context of even aged management. We recommend an action item for the ANF Plan of drafting a set of guidelines to protect the view shed of established scenic byways and recreation venues. As a working forest with active timber, gas and oil extraction, smart planning can protect view sheds along scenic byways, trails and recreation areas. Approximately 93 percent of the ANF subsurface is owned by private concerns. Wilderness designation has no impact on road development for oil and gas extraction, which is and will remain a major source of economic vitality for the region.

Guidelines for road development for oil, gas and forest extraction be set that improve view shed retention with an eye to future trail connectivity for non-motorized and motorized recreation development.

ES-13 Economics- The forecast of a decline in a total of 275 jobs and a projected loss of labor income of 10 million dollars under Alt. C versus Alt A. are alarming projections and signal an immediate need for revisions to Alt. C.

Allegheny National Forest
Forest Plan Revision
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We ask that you consider these comments and the negative impact of Alternative C not only on the economies of the communities surrounding the ANF, but on the stunting of the development of recreational opportunities to be offered to the public. We are in agreement with the public in that the development of recreational and tourism opportunities should be identified as a priority in the proposed Land and Resource Management Plan for the ANF.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara Andrews".

Sara Andrews
Executive Director



August 24, 2006

Allegheny National Forest
Forest Plan Revision
PO Box 36
Warren, PA 16365

The City of Bradford would like to offer the following comments on the Proposed Land and Resource Management Plan:

Developed recreation has not received a priority in the plan as presented under Alternative C, only 1,477 acres within the 513,000 acre forest are listed as MA 7.1 for developed recreation. This is less than .002% of the forest.

Tourism and recreation need to be recognized as an important economic factor of the forest. Tourism is now the second largest industry in Pennsylvania.

Establishing connections to the surrounding communities needs to be an action item within the plan through trail development, recreation corridors and links to services.

We support the increase in developed recreation as presented in Alt. B, increasing developed recreation to 1,772 acres.

We do NOT support the designation of Tracy Ridge and Chestnut Ridge as presented for Wilderness Study areas. Tracy Ridge already has a National designation as a National Recreation Area (NRA) and needs no other designation. It is protected as a remote area that emphasizes dispersed recreation. It has an excellent system of new hiking trails and borders the shoreline of the Allegheny Reservoir.

There are already 8,979 acres of designated wilderness with the ANF versus 1,040 acres for developed recreation. Studies indicate only 2% of the public seeks wilderness recreational opportunities versus 33% who seek developed recreation opportunities.

Alternative C does not recognize or propose a plan that addresses current recreation demands and future tourism trends.

Opportunities for a resort, cabins, and possibly marina expansion or marina development should be explored. The potential of a Wilderness designation for Tracy Ridge would exclude key areas from these developmental opportunities, limiting access and economic vitality for recreational development.

The Allegheny Reservoir is the capstone for developed recreation on the ANF, and it is close in proximity to New York I-86.

Willow Bay is of significant importance currently as a developed recreation area and we recommend that this designation area be expanded not decreased as currently recommended in Alternative C.

A proposed study on recreation development along the shoreline of the Allegheny Reservoir delineate developmental opportunities specifically include Willow Bay.

Willow Bay presents an unique opportunity to link with NY Interstate 86 transportation corridors and is near to private land holdings that could stimulate private development on non public lands.

Sugar Bay Area and the Kinzua Beach Area be pinpointed as study areas for future recreation development.

Alternative C does not address the need to designate interpretive recreation areas, we support the addition of interpretive recreation areas in the forest.

A study area be developed along Chestnut Ridge as a second experimental forest laboratory for conducting research to regenerate our oak forest, with interpretive trails and the inclusion of plans for a resource management plan that lends itself to scientific and educational demonstration areas.

Summary of the Draft Environmental Impact Statement
ES-27-Outline a strategy for interpretation of the Native American history of the region, along with other historic areas. Emphasize opportunities to establish educational demonstration and interpretive sites. In the summary report, only road less areas and wilderness designations area listed as special areas of concern.

ES-32-Scenery is only mentioned in the context of even aged management. We recommend an action item for the ANF Plan of drafting a set of guidelines to protect the view shed of established scenic byways and recreation venues. As a working forest with active timber, gas and oil extraction, smart planning can protect view sheds along scenic byways, trails and recreation areas. Approximately 93 percent of the ANF subsurface is owned by private concerns. Wilderness designation has no impact on road development for oil and gas extraction which is and will remain a major source of economic vitality for the region.

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Guidelines for road development for oil, gas and forest extraction be set that improve view shed retention with an eye to future trail connectivity for non-motorized and motorized recreation development.

ES-13 Economics

The forecast of a decline in a total of 275 jobs and a projected loss of labor income of 10 million dollars under Alt. C versus Alt A. are alarming protections and signal an immediate need for revisions to Alt. C.

Full plan for review is available on-line at:

http://www.fs.fed.us/r9/forests/alleggheny/projects/forest_plan_revision/DEIS-LRMP/index.php

Respectfully submitted,



Michele Corignani, Mayor
City of Bradford



THE BOROUGH OF RIDGWAY
108 Main St, P.O. Box 149, Ridgway, PA 15853
(814)776-1125
Fax: (814)772-5167
Email: ridboro@alltel.net

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August 23, 2006

Allegheny National Forest
Plan Revision
P.O. Box 36
Warren, PA 16365

To Whom It May Concern:

Please find enclosed a copy of Ridgway Borough's Resolution 10-2006 and the comments that have been reviewed and forwarded.

Please also be advised the Borough's Water Treatment Plant and Reservoir along Mill Creek that are in or on the fringe of the Allegheny National Forest the Borough does not want any development that could possibly contaminate or adversely affect the borough's water supply.

Thank you in advance for your cooperation.

Sincerely,

Martin R. Schuller
Borough Manager

MRS/lk
Enclosures

Table A-2. Government Entities using 23 Point Letter and/or Resolution

ANF Letter Number(s)	Originator	Points Included	Points Not Included
75	Tionesta Borough	4	16, 15, 20, 21 (points included)
89	Mead Township	23	N/A
225	Columbus Township	Resolution and 20 points	2, 3, 23
245	Jones Township	Resolution and 9 points	1, 2, 4, 5, 10, 13, 14, 15, 16, 18, 19, 20, 22, 23
279 and 493	Elk Township	Resolution and 22 points	16
280	Freehold Township	Resolution only	N/A
469	Smethport Area School District	Resolution only	N/A
475	Bradford Area School District	Resolution only	N/A
481	Howe Township	10 points	7, 8, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 23
482	Forest Area School District	Resolution and 23 points	N/A
485	Sheffield Township	21	17, 19
486	Brokenstraw Township	23	N/A
487	Ridgway Borough	Resolution, letter, and 23 points	N/A
488	Clarendon Borough	23	N/A
489	Farmington Township	22	16
490	City of Bradford	Letter plus 23 points	N/A
491	Cherry Grove Township	23	N/A
492	Pine Grove Township	23	N/A
494	Pleasant Township	22	17
495	Corydon Township	18	4, 5, 8, 13, 21
496	Ridgway Area School District	23	N/A
497	Ridgway Township	Resolution plus 23 points	N/A
498	Watson Township	23	N/A
499	Warren County School District	Resolution plus 23 points	N/A
500	Eldred Township	23	N/A
502	Kane Area School District	23	N/A

23 Point Comment Letter

1) The Federal Land Policy and Management Act and 36 C.F.R. §219.9 require that local government agencies be provided with an early, frequent, and adequate opportunity to be involved during all stages of the planning process. Page 2 of the Draft Environmental Impact Statement outlines the type of involvement that was allegedly afforded to local government agencies.

In reality, however, local government agencies were not adequately involved in the planning process because the contacts described in the Draft Environmental Impact statement were predominantly informative in nature, the agencies did not have adequate opportunity to express their concerns to the Planning Committee until after the Proposed Plan had been released, and an appropriate system for communication was not established so that the concerns of these agencies could be effectively expressed to the Planning Committee during the early stages of the planning process.

For example, at the 2005 Spring meeting for the Allegheny Hardwood Utilization Group, Fred Norberry, the Deputy Chief for National Forest System Lands, stated, in response to a question, that local government agencies should be involved in the planning process no less than two years before the notice of intent to change the Plan is filed. However, local government agencies were not given the opportunity to be involved in the planning process until April of 2005 (the time at which Geoff Chandler became the Forest Supervisor), which was well after the time frame indicated by Fred Norberry. This was a violation of both federal law and the Forest Service's own policy/operating procedure.

Additionally, during the winter of 2005-2006, 19 local municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts adopted similar resolutions outlining 12 management goals and objectives for the Allegheny National Forest. These resolutions marked the first time that these local entities were given the opportunity to provide official input regarding the management of the Allegheny National Forest, and the above numbers indicate a clear desire on the part of local government entities to participate in the process. This indicates that had the Code of Federal Regulations and the Forest Service's own policy/operating procedure been complied with, a large number of local government agencies would have enthusiastically participated in the planning process.

The intent of the federal laws referenced above is to foster adequate government to government communication during the planning process. However, during the planning process, a flawed collaborative learning model was present, thus impairing the ability of local government agencies to participate in the planning process. For example, the vast majority of sessions that local government officials were invited to attend were also open to the general public and advocacy groups, which impaired the ability of local officials to effectively participate in the planning process.

Therefore, because the planning process was not in compliance with federal law and the Forest Service's own policy/operating procedure, local government agencies were deprived of their right to participate, and the Proposed Plan must be rescinded and begun anew to ensure that local government agencies are provided with the type of involvement that they are entitled to under the Code of Federal Regulations, the Federal Land Policy and Management Act, and the Forest Service's own policy/operating procedure.

2) There are 3 Local Development Districts (LDD's) of the Appalachian Regional Commission (the Northwest Commission, the North Central Commission, and the Southern Tier West) within the boundaries of the Allegheny National Forest that are federal agencies recognized as regional experts with regard to economic development. Each of these 3 LDD's adopted similar resolutions (2 unanimously and 1 with a single dissenting vote) during the winter of 2005-2006 that outlined 12 desired goals and management strategies for the Allegheny National Forest.

The Code of Federal Regulations specifically allows the Forest Service to include these entities as agents during the planning process and, given the expertise of these federal agencies, they should have been intricately involved in the planning process. However, these LDD's were not provided with an adequate opportunity to participate in the process, and the Proposed Plan (specifically the preferred alternative C) indicates that the resolutions passed were in great part ignored by the Planning Committee. Therefore, the Proposed Plan must be rescinded and begun anew so that these expert agencies can be given an adequate and early opportunity to significantly participate in the planning process.

3) The Proposed Plan follows a national model of forest management. While this model may be effective for managing other national forests, it is not an effective model to manage the Allegheny National Forest because there are unique characteristics associated with the Allegheny National Forest that simply are not present in other National Forests throughout the country.

For example, 93% of the subsurface rights are privately owned, which differs from any other National Forest in the country. Additionally, the Allegheny National Forest grows hardwoods of a quality not found anywhere else in the nation. This timber is the most valuable timber of any National Forest in the country. Due to these unique attributes associated with the Allegheny National Forest, a national management model that does not take into account these characteristics should not have been implemented to develop the Proposed Plan.

Rather, a management strategy that takes into account the distinctive features of the Allegheny National Forest needs to be implemented in order to ensure that the benefits (economic and otherwise) associated with these distinctive features are maximized to the greatest extent possible. Therefore, the Proposed Plan must be rescinded and a new plan must be formulated based on a model of forest management that takes into account the unique characteristics associated with the Allegheny National Forest.

4) The Federal Land Policy and Management Act, the National Forest Management Act, and the Code of Federal Regulations require that federal land use plans be coordinated with and be consistent with local plans. These provisions also require that local plans and policies be considered during the planning process and that adequate consideration be given to the impact of the Proposed Plan on the local economy and culture. Despite these requirements under federal law, local plans were in great part ignored during the planning process.

The above federal laws also intimate that local goals and objectives are to be taken into account during the planning process and that the Proposed Plan should reflect these local goals and objectives to the greatest extent possible. However, the Proposed Plan, and specifically the preferred alternative C, evidences the fact that the local goals and objectives with regard to the management of the Forest were in great part ignored during the planning process.

For example, during the winter of 2005-2006, 19 local municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts adopted similar resolutions outlining these entities' goals and objectives with regard to the management of the Allegheny National Forest. The resolutions called for a comprehensive shoreline management strategy and increased recreation around the shoreline, which is simply not present in the Proposed Plan. This is merely one example, the resolutions generally covered 12 points or objectives. While these resolutions are not local land use plans, they do provide clear evidence of the local intent with regard to the management of the Forest, and they should have been given proper consideration by the Planning Committee.

These resolutions are cited in the Draft Environmental Impact Statement, but the Proposed Plan, and specifically the preferred alternative C, simply ignores these resolutions to a great extent. Because local land use plans and local goals and objectives with regard to the management of the Forest were ignored, the Plan must be rescinded and revised so that, as required by federal law, the local plans and the goals and objectives of local government entities are given greater weight in the development of the Forest Management Plan.

5) 36 C.F.R. §219.10 states that, "Sustainability, for any unit of the National Forest System, has three interrelated and interdependent elements: social, economic, and ecological." As such, these elements should be given equal weight throughout the planning process, and the Proposed Plan should adequately analyze each element.

The Proposed Plan and accompanying Draft Environmental Impact Statement contain an in depth and long range (through 2060) ecological analysis. However, the socioeconomic analysis is short term and rudimentary at best. Moreover, the informative and analytical materials made available to the public contain significant quantities of material concerning the ecological analysis and very little material concerning social and economic matters. For example, the Proposed Plan is fundamentally flawed because it does not adequately consider the economic impact relative to the increase in oil and gas development that will inevitably occur in the Forest during the lifespan of the Plan.

This lack of analysis and material makes it impossible to have appropriate discussion of the social and economic issues. This inadequate analysis of the social and economic issues, especially in contrast with the ecological analysis, is inconsistent with the requirements contained in the Code of Federal Regulations. Therefore, the Proposed Plan must be rescinded and revised so that it comports with the Code of Federal Regulations by providing a long term, in depth analysis of the socioeconomic impact of the Proposed Plan.

Timber

6) The preferred alternative C sets the ASQ for timber harvesting at 56 MMBF per year, a figure that is 41% less than the ASQ of 94.5 MMBF per year set by the 1986 Plan and 59% less than the allowable harvest of 137 MMBF per year that was present in 1975 Functional Timber Management Plan. Additionally, the number of jobs, the amount of revenue derived by local municipalities and school districts, etc. are all based on timber harvesting at the proposed rate of 56 MMBF per year.

Interestingly, the Planning Committee openly admits that, due to current budgetary constraints, it is not possible to harvest even the 56 MMBF per year as proposed by Alternative C. The proposed ASQ is based on an approximately 40% increase in budget, yet the Proposed Plan contains no evidence that this increased funding will occur or from where it will come.

Based on the current budget, an annual offer/harvest volume of 25-30 MMBF per year is the level that the Forest Service itself claims is an appropriate figure. Given the uncertainty associated with the budget that will be available, the Proposed Plan must be rescinded and revised so that it adequately sets forth a realistic socio-economic scenario based on past budget allocations (e.g. the last 5 years adjusted for inflation) as permitted by the National Forest Management Act. This is, after all, the current budget reality.

Additionally, the Proposed Plan must be rescinded and revised so that it addresses and explores both the possibility of stewardship contracting and how the budget can be increased to permit timber harvesting at a rate of 56 MMBF per year so that the economic benefits associated with the higher ASQ can be achieved.

7) The Proposed Plan creates the appearance that a younger and more even-aged forest is being created by simply changing the age designations that were present in the 1986 Plan. However, the fact remains that the timber growth rate far exceeds the harvest rate on the Allegheny National Forest. This fact results in the creation of an aging, and in some circumstances a dying, forest.

For example, black cherry is currently valued the highest of commonly traded and domestically produced hardwoods nationwide; the value of black cherry has nearly doubled over the past ten years, with its value in 2004 being \$3,000 per thousand board feet of stumpage; the Allegheny National Forest contains nearly 25% of the

nation's total inventory of black cherry sawtimber and a higher relative proportion of top grade sawtimber; black cherry is the leading species in sawtimber volume on the Allegheny National Forest, comprising over 1/3 of all growing stock; and since 1986 the demand for timber from the Allegheny National Forest has increased dramatically, in great part due to the high value of black cherry.

These figures indicate that, for obvious economic reasons, black cherry should be harvested to the greatest extent possible while still retaining the diversity and integrity of the Allegheny National Forest. Nevertheless, due to the established ASQ and budgetary constraints associated with the Proposed Plan, black cherry trees that are at an age in which they have been routinely harvested in the past will not be harvested and older black cherry trees will die before they can ever be harvested.

The black cherry which became established following the liquidation harvest at the turn of the century by and large has reached financial and physical maturity across the Allegheny National Forest and is currently at a critical development stage as it suffers increased mortality. However, because of the proposed ASQ and budgetary constraints, the result is that mature tree stands will not be harvested. Instead the unhealthy conditions now present in those stands will accelerate. Overly mature trees are falling victim to disease (such as red rot) and wind damage. As these trees fall they pose risks to other healthy trees as well as users of the forest. Additionally, the unusually high monetary value of these trees is needlessly wasted.

In essence, the Proposed Plan's reduced rate of annual harvest will not keep pace with the annual growth and normal mortality, which will result in thousands of acres of timber being left to rot on the stump. To combat these deficiencies in the Proposed Plan, the Plan must be rescinded and revised to more adequately address the potential problems associated with an aging forest (the effect on timber harvesting, the risk of fire, the risk of disease, and other catastrophes associated with an aging forest) and to specifically allow for a rate of harvest exceeding the ASQ with the potential for stewardship contracting as a processing option to stimulate the economy and prevent the unnecessary waste of the valuable timber resources that are so intricately connected to local economies.

8) Forest Managers recommend that a forest should contain an equal balance between late successional habitat and early successional habitat. Nevertheless, the preferred alternative C proposes 28-32% late successional habitat, only 8-10% early successional habitat, and creates five times more late successional habitat than alternative A.

Early successional habitat is the preferred habitat for a number of wildlife species including grouse, woodcock, and rabbits. As the amount of early successional habitat decreases, so does the prevalence of these wildlife species that are dependent upon this habitat for their continued existence.

Additionally, there are endangered species that are dependent upon an adequate amount of early successional habitat to ensure survival. Given the decreasing amount of early successional habitat that is proposed under the preferred alternative C, this alternative increases the possibility of these endangered species becoming extinct.

Last, the current amount of early successional habitat serves as an indicator for the amount of mature timber that will be present at a later date. Therefore, if the preferred alternative C is adopted, an inadequate amount of early successional forest will be present, which will ultimately lead to an inadequate amount of mature timber at a later date after what is now mature timber begins to die or is harvested.

This lack of mature timber will have a substantial impact on the overall health and diversity of the Allegheny National Forest. Accordingly, rather than relying on disturbances (such as fires, oil and gas production, etc.) to create greater levels of early successional habitat, the preferred alternative must be rescinded and revised so that, as recommended, there is an equal balance between late successional habitat and early successional habitat.

It should also be noted that the indicator wildlife species selected for analysis in the Draft Environmental Impact Statement in great part require late successional habitat, thereby justifying the increased amount of such habitat proposed under alternative C. If different species had been selected (e.g. grouse, woodcock, rabbits, etc.), the conclusion could have just as easily been reached that more early successional habitat is required. In other words, it appears as though the indicator species selected were selected in order to bolster a desired result, rather than to ensure the overall health of the Forest and the species that occupy it.

The Draft Environment Impact Statement, using the viability outcome scale as it applies to the 77 indicator species, also indicates that none of the four alternatives will have a significant impact on species diversity. Therefore, given that an increase in the amount of late successional habitat is not necessary for continued species diversity, the Proposed Plan must be rescinded and a preferred alternative must be created which puts more emphasis on the creation of early successional habitat and creates an equal balance of early successional and late successional habitat as recommended by Forest Managers. It should also be noted that such an alternative would not have a significant impact on the amount of late successional habitat because, due to the reality of under-harvesting caused by budgetary constraints, the goal for achieving an adequate level of late successional habitat will still be met.

9) Oak trees in the Allegheny National Forest are not being managed or regenerated effectively due in part to the management strategies that are implemented where these trees are located. There are approximately 70,000 acres of oak trees in the Allegheny National Forest. Roughly 35,000 of these acres are in areas that preclude the effective management of oak trees.

For example, a large percentage of these acres are in Wilderness Areas, Remote Recreation Areas, or National Recreation Areas where harvesting is administratively prohibited. The oak trees will not regenerate absent active management. As a result of being in these areas the oak trees will not be managed for regeneration, the oak trees which are now reaching maturity and which eventually will die will not be replaced with oak trees, and oak trees will not be able to be adequately harvested. As a consequence, the oak tree population within the Allegheny National Forest will decrease dramatically.

The end result is that oak trees, which were once the number one producing tree in the Allegheny National Forest, are no longer being managed in a manner that exploits the wildlife, aesthetic, and economic benefits associated with these trees. It is acknowledged that the landscape/topography of the areas where many oak trees are located is not conducive to timber harvesting. However, this only increases the importance of designating those areas where harvestable oak trees are present as management areas that permit adequate harvesting and regeneration of the species. Therefore, the Proposed Plan must be rescinded and revised so that areas where large quantities of oak trees are present and where harvesting is possible are designated as areas that can be managed in a manner that ensures adequate harvesting and regeneration of oak and prevents the overall aging and mismanagement of the species.

10) The 1995 Timber Resource Capability Study projected that the current sustainable harvest would be approximately 53 MMBF per year. The Study also indicated that the sustainable harvest could be as high as 72 MMBF per year if upland hardwoods could be adequately regenerated. Through adaptive management strategies and improved upland hardwood science, it is now possible to adequately regenerate upland hardwoods. Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative proposes an ASQ of at least 72 MMBF per year, and not 56 MMBF per year.

11) The amount of revenue derived from timber cutting in the Allegheny National Forest has a direct correlation to the amount of revenue derived by local municipalities and school districts from such timber cutting, the amount of jobs within the timber industry, and the overall economic well being of municipalities and school districts in Elk, Forest, McKean, and Warren County. The projected annual timber receipts for the next two decades are

considerably higher for alternatives A and B (\$137.8 million and \$130.2 million respectively) than for alternative C (\$107.5 million).

Additionally, the projected 25% payments to local municipalities and school districts under alternatives A and B would be approximately \$1 million per year greater than for the preferred alternative C, and alternative A offers nearly 31,000 more acres of “suitable forest land” for timber production than does the preferred alternative C. Last, the preferred alternative C doubles the amount of “no active management” land, which contributes to the decline of Allegheny Hardwoods.

Given the economic benefits that timber harvesting creates for local communities, in order to meet the needs of local communities the preferred alternative must maximize the permissible amount of timber harvesting and the amount of land available for timber management to the greatest extent possible. As indicated above, the preferred alternative C clearly fails in this regard. Therefore, the Plan must be rescinded and revised so that the preferred alternative maximizes the amount of revenue derived from timber cutting in the Allegheny National Forest to the greatest extent possible.

12) Reports indicate that uneven-aged management is more costly and more intrusive than even-aged management. Additionally, even-aged management allows for higher retention of Allegheny Hardwoods, which are the most profitable species for timber harvesting in the Allegheny National Forest.

Therefore, the preferred alternative must emphasize even-aged management to the greatest extent possible in order to cut costs and ensure the proliferation of the most profitable tree species in the Allegheny National Forest. Alternative A proposes a much higher level of even-aged management than alternative C (92% vs. 60% respectively), and it also de-emphasizes uneven-aged management to a greater extent than alternative C (less than 1% vs. 25% respectively). Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative allows the benefits associated with even-aged management (as described above) to be exploited.

Moreover, research has shown that, given high deer densities on the Allegheny National Forest, it is simply not possible to implement an uneven-aged management system. Therefore, the Proposed Plan must be rescinded and revised so that uneven-aged management is excluded as a forest management strategy to the greatest extent possible.

13) The Multiple Use and Sustainable Yield Act requires that the Forest Service maintain a “sustainable yield” with regard to timber harvesting and management. Additionally, the Code of Federal Regulations mandate that a declining timber yield from decade to decade is not permissible. Last, the Weeks Law of 1911 (which authorized the creation of the Allegheny National Forest) specifically states that the Forest is to be managed in accordance with two primary objectives: timber for local economies and water shed protection. Despite the above regulations, the amount of timber harvesting in the Allegheny National Forest has decreased from decade to decade, and the current level of timber harvesting is not sufficient to maintain a “sustainable yield,” all of which is in violation of federal mandates.

The ASQ set forth in the 1986 Plan was 94.5 MMBF per year. However, from 1986 to the present, less than half of the permissible board feet have actually been harvested. Now the preferred alternative C further reduces the ASQ to 56 MMBF per year, and it is likely that, due to budgetary constraints, the actual amount of timber harvested will be in the 25-30 MMBF per year range for the duration of the planning period.

Research indicates that as much as 118 MMBF of timber per year is being produced in the Allegheny National Forest. Given that 118 MMBF per year is being generated while only 25-30 MMBF per year will be harvested, the Forest Service is not maintaining a “sustainable yield” as required by the Multiple Use and Sustainable Yield Act.

Additionally, over the past several decades, the amount of timber harvesting has steadily declined in violation of the Code of Federal Regulations. These disturbing trends are in violation of the Code of Federal Regulations, the Multiple Use and Sustainable Yield Act, and the Weeks Law of 1911. Therefore, in order to comply with federal law, the Proposed Plan must be rescinded and revised so that the amount of timber harvesting is sufficient to maintain a “sustainable yield,” to prevent the continuing decline of timber harvesting from decade to decade, and to meet the needs of local economies.

OGM

14) The Proposed Plan designates certain areas as Wilderness Study Areas or Remote Recreation Areas, with such designations precluding road development and timber cutting. However, the Plan does not adequately account for the impact that a significant increase in the amount of oil and gas development will have on such areas.

Appendix F of the Proposed Plan projects that 191,000-241,000 acres of National Forest surface, where the mineral rights are either outstanding or privately owned, will be developed within the next 15-20 years. Ninety-three percent of the subsurface rights within the Allegheny National Forest are privately owned and oil and gas production in the Allegheny National Forest currently stands at 6.5 million barrels per year and 20 BCF per year.

The Plan projects that these figures will increase to 8.7 million barrels and 28 BCF annually. Additionally, given dwindling oil and gas supplies elsewhere in the world, there is a possibility that these projections may in fact be surpassed, which will lead to extensive road development and a significant amount of timber removal within areas designated as Wilderness Areas or Remote Recreation Areas. All of the above will preclude effective implementation of the desired condition along with the management goals and objectives associated with these management areas.

For example, the Forest Service manages approved Wilderness Study Areas to “preserve wilderness values,” which is simply not possible if oil and gas development occurs. Therefore, the Proposed Plan must be rescinded and revised so that those proposed Wilderness Study Areas which are located in areas where the United States does not own the mineral rights are dropped and reclassified as management areas which permit and facilitate the inevitable oil and gas development.

In essence, unless these subsurface rights can be purchased by the federal government or these areas and the associated rights are condemned, little can be done to prevent the increased exercising of oil and gas rights within the Allegheny National Forest. Therefore, the Proposed Plan must be revised so that it recognizes the conflict associated with the co-ownership (surface and subsurface) of the Allegheny National Forest, provides a much more detailed analysis on exactly how oil and gas rights may affect these areas, and designates areas where there is known to be large quantities of oil and gas as management areas that permit and foster the inevitable oil and gas development.

15) Oil and gas development provides a significant and positive economic impact to local communities and employs more local citizens than even timber harvesting (jobs directly related to oil and gas production within the Allegheny National Forest are estimated to be 1,321 and are projected to reach more than 1,800 at the mid-point of the planning period; labor income related to oil and gas production is currently at \$42 million annually and is projected to increase to \$58 million annually by the mid-point of the planning period).

Despite the inevitable oil and gas development and the economic benefits associated with such development, the preferred alternative C designates areas where there are known to be large quantities of oil and gas deposits as non-motorized Recreation Areas or Wilderness Areas. Such a plan sets into motion fundamental conflict between the rights to remove the privately owned oil and gas and the usage limitations inherent in Wilderness and non-motorized Recreation Areas.

For example, the Proposed Plan proposes management area 6.2 as a Remote Recreation Area. This management area overlies a future oil and gas development zone, which means that future management actions in this area will be in conflict with oil and gas development.

The social and economic impact of oil and gas development within the Forest boundaries is very significant. Nevertheless, the Proposed Plan makes only passing reference to these impacts. Certainly there is no analysis of how the conflict between the proposed management actions and the private development of the subsurface rights will impact these social and economic factors. Certainly there is no discussion of how alternative management actions might be employed to facilitate development of subsurface rights and the effect such facilitation would have from the social, economic and ecological perspectives.

Additionally, the Proposed Plan fails to contain management objectives which account for the reality of the expected subsurface development. It is true that the Plan acknowledges the increased level of subsurface development; the Plan acknowledges that such activities will likely bring results such as soil compaction and significant increases in roaded areas. However, the Plan fails to actually apply these consequences. As noted above, the non-motorized Recreation and Wilderness Areas are advanced as though subsurface consequences did not exist. More important, the Plan fails to consider how the subsurface consequences might be used as opportunities for alternative management objectives. For example, the plan fails to consider that areas subject to significant surface disturbance due to oil and gas extraction might subsequently be appropriate areas for motorized or other recreation activities.

The Proposed Plan must be rescinded and revised so that it recognizes that oil and gas development is going to occur, acknowledges the conflict that such development will create, and emphasizes the economic benefits of such development (the Proposed Plan only seems to focus on the negative aspects of oil and gas development). Additionally, all management areas in the Proposed Plan that overlay high potential oil and gas development zones and where management goals conflict with oil and gas development must be replaced with management areas that have resource management objectives compatible with active oil and gas development.

RECREATION

16) The land designations contained in the preferred alternative C, or any of the four alternatives for that matter, do not specifically allow for the construction of a resort, or similar development, within any area of the Allegheny National Forest. This is the case even though a \$208,000 recreational study exploring the feasibility of such a resort at the Allegheny Reservoir has not been completed, and a previous study said that a resort on the Allegheny Reservoir was feasible.

By not specifically allowing for the construction of a resort, the Plan deters potential developers from seriously considering the construction of such a resort and ultimately precludes the counties and school districts from the potential for a significant amount of tax revenue that could be derived from such a resort.

For example, if 1/3 of the 90 miles of shoreline along the Allegheny Reservoir were to be developed, this would create a potential area in excess of 18,000 acres. Assuming hypothetically that the assessed value is \$25,000 per acre and that the area is developed one mile deep, this would create approximately \$4,106,250 in additional tax revenue for counties and approximately \$10,125,000 in additional tax revenue for school districts.

This revenue is much needed given the decreasing citizen and student populations throughout the four county area that comprises the Forest, and these local needs should have been given much more weight during the planning process. By not clearly stating that the construction of a resort, or similar development, is permissible under the Proposed Plan, this is potential revenue that will likely never be realized because reputable developers will be deterred from considering the construction of such a resort. Therefore, understanding that site specific factors will have to be taken into account at a later time, the Forest Service must recognize the extraordinary economic

impact that such a development would have on local communities, and the Proposed Plan must be rescinded and revised so that it carries forward the decision in the 1986 Plan by specifically allowing for the development of a motel/restaurant. It should also be noted that such a designation would actually be an asset for the proposed recreation study for the remainder of the reservoir because one controversial aspect of reservoir development will have been resolved, and the study can then simply focus on supplemental and complimentary developments for the resort.

17) The 1986 Plan, as well as the similar 12 Point Resolutions adopted by 19 municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts called for in excess of 300 miles of ATV trails within the Intensive Use Areas on the Allegheny National Forest. This objective has not been met and the preferred alternative C, by proposing 173 miles of ATV trails, indicates that there is no intention of ever having 300 miles of trail.

In recent years, ATV use has become an increasingly popular form of recreation in the Allegheny National Forest, with revenue from ATV permits totally approximately \$221,790 in 2003, \$243,260 in 2004, and \$210,750 in 2005. Given the increased popularity of ATV use in the Allegheny National Forest, creating an excess of 300 miles of ATV trails would bring a greater number of people into contact with the Forest and ultimately create much needed economic benefits for local communities.

ATV use has a much greater economic impact on local communities than non-motorized recreation. For example, the Allegheny National Forest data estimates that the direct economic impact to the Allegheny National Forest four county area from ATV use is \$17 million annually. Therefore, the Proposed Plan must recognize the economic benefits associated with ATV's and increase the number of trail miles to an excess of 300 miles in order to generate more revenue for local communities from ATV use. These potential benefits to local communities were ignored in the Proposed Plan.

Alternatives A and B offer a greater number of ATV trail miles (181 miles and 232 miles respectively) than the preferred alternative C (173 miles), but none of the alternatives reach the 1986 proposal for in excess of 300 miles of trail. Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative increases the miles of ATV trails to the 300 miles originally contemplated in the 1986 Plan by expanding the number and/or size of Intensive Use Areas (which currently limit the miles of trail available) or by removing special land use designations which preclude the use of ATV's. Such revisions would adequately consider the needs of local communities and allow these communities to enjoy the economic benefits associated with ATV use that are described above, while also increasing the number of people that frequent the Allegheny National Forest.

18) The Proposed Plan specifically states that an increase in non-motorized recreation is not expected to occur during the planning period, yet the preferred alternative C designates more areas as remote recreation areas, which are only conducive to non-motorized recreation. There is no need or desire for an increase in the number and/or acreage of remote recreation areas.

For example, the percentage opportunity of semi-primitive non-motorized activities nearly doubles from alternative A to alternative C (34,000 acres to 60,000 acres respectively), despite the fact that only 3% of the recreation in the Allegheny National Forest is of this type. Therefore, the Proposed Plan needs to be rescinded and revised so that a new alternative can be developed that decreases the number of remote recreation areas and replaces them with designations that accommodate motorized recreation by permitting such recreation. This would respond to public demand as articulated during the public comment phase for the draft plan. Additionally, this would enable local communities to receive the economic benefits associated with motorized recreation that are not present for non-motorized recreation.

OTHER

19) It is clear that the federal government does not possess the budget, human resources, or active management policy to effectively manage the entire acreage contained in the Allegheny National Forest. Therefore, the Proposed Plan must be rescinded and revised so that it sanctions the possibility of divesting the management and/or ownership of portions of the forest to either the state, local government, or private entities in the event that federal legislation is enacted which permits such a partnership between the federal government and these entities.

In Idaho, a Resolution was passed which allowed the state to manage portions of a National Forest because it was not being managed effectively by the federal government. The Proposed Plan must be rescinded and revised so that it acknowledges the fact that the same type of situation is present in the Allegheny National Forest and sanctions the possibility of divesting management and/or ownership in order to ensure that the forest is managed adequately in all respects.

If this is contained in the Plan, it would serve as a catalyst for the enactment of the needed federal legislation, which would ultimately permit such a divestiture to occur. Such divestiture could also accommodate the needs of local government agencies and communities by providing much needed sources of increased revenue to offset the revenue lost as a result of decreases in residency and the number of jobs available.

20) Designating areas as Wilderness Areas, Remote Recreation Areas, Wild and Scenic Areas, or National Recreation Areas precludes the construction of a telecommunications infrastructure in these areas. Currently, 13 of the 15 land use designations do not permit the construction of communications towers.

Given the current inadequacy of telecommunications service in the area and the barriers that the Proposed Plan creates for the construction of a telecommunications infrastructure, a safety issue is present for those individuals who frequent the Allegheny National Forest. Therefore, rather than modifying the Plan at a later date, the Proposed Plan must be rescinded and revised so that all management areas will allow for the construction and placement of communications towers. This will better ensure the safety of those that frequent the Allegheny National Forest and promote increased use and recreational development.

21) Many local industries have left the area over the past several years, and a sufficient number of jobs have not been created to replace the number of jobs eliminated due to the departure of these prominent industries. As a result, an increased number of people have been required to leave the area, thus decreasing the populations in Elk, Forest, McKean, and Warren Counties.

In order to reverse this trend, new jobs need to be created so that, as industries leave the area, local residents still have an opportunity to remain. However, the preferred alternative C projects a far less increase in employment (730 jobs) than Alternatives A and B (1,000 jobs). Additionally, a greater labor income is projected for alternatives A and B (\$40 million, an 85.6% increase) than for the preferred alternative C (\$30 million, a 62.6% increase). Therefore, the Proposed Plan must be rescinded and revised so that the preferred alternative emphasizes increased employment and labor income to the greatest extent possible.

22) 36 C.F.R. §219.6 requires that monitoring programs be implemented to determine how the land use plans are affecting local economies and communities that are dependent on the Allegheny National Forest. The monitoring programs are designed to determine whether local economies and community stability are adequately being protected through the planning process and whether the intent of National Forest establishment legislation is being carried out.

To our knowledge, no such monitoring plan or a codified communications protocol regarding the monitoring plan exists and, if it does exist, it would clearly indicate that local economies were not adequately protected under the 1986 Plan, and will be protected to an even lesser degree under the Proposed Plan. For example, local

communities are largely dependent upon timber harvesting and oil and gas production as key sources of revenue for their economies.

Despite this, the preferred alternative C decreases the ASQ by nearly 40 MMBF, projects an actual harvest of 25 to 30 MMBF annually, and designates areas where there are known to be large quantities of oil and gas as Wilderness Study Areas or Remote Recreation Areas, which creates barriers to development in these areas. Additionally, the Proposed Plan does not build on the 1986 Plan by specifically sanctioning the construction of a resort on the Allegheny Reservoir, which would of course provide a much needed economic boost to local communities and greatly enhance the likelihood that a reputable developer would come forward with a development proposal.

Given that any such monitoring program would clearly indicate that local economies have not, and will not, be protected by the current management plans, the Proposed Plan must be rescinded and revised so that the preferred alternative ensures that local economies and community stability are adequately protected.

23) The Federal Land Policy and Management Act, the National Forest Management Act, and the Code of Federal Regulations require that federal land use plans be coordinated with and be consistent with local plans. These provisions also require that local plans and policies be considered during the planning process and that adequate consideration be given to the impact of the Proposed Plan on the local economy and culture. Despite these requirements under federal law, local land use plans developed by Warren County were in great part ignored during the planning process.

For example, page 97 of the Warren County Comprehensive Plan Update (August of 2005) specifically calls for the development of a resort at the Allegheny Reservoir near the Kinzua Beach area. Additionally, pages 98 and 99 of the Plan Update recognize the shortfall in timber harvesting and specifically call for increased timber harvesting in order to generate needed revenue for local economies. Last, page 99 of the Plan Update recognizes the lack of an adequate communications infrastructure and the need for an improved infrastructure.

The federal mandates discussed above require that the Proposed Plan be coordinated with and consistent with the Plan Update, and the Plan Update was formulated in plenty of time for this to have occurred. However, the Proposed Plan in great part ignores the Plan Update by not specifically allowing for the construction of a resort near the Kinzua Beach area, by not taking action to increase much needed timber harvesting, and by precluding the construction of communications towers in 13 of the 15 management areas.

The Plan Update even goes so far as to articulate the lack of local input with regard to the management of the Forest by stating that, “Although both the Kinzua Dam/Allegheny Reservoir complex and the ANF are located in Warren County, there is little local input into the development, or operation of these resources - resources important for local recreation opportunities and for economic development. This should, and must, change.”

Because the Planning Committee made no effort to make the Proposed Plan consistent with Warren County local land use plans, the Proposed Plan is in violation of federal law. Therefore, The Proposed Plan must be rescinded and revised so that the preferred alternative is coordinated with and consistent with the Warren County Comprehensive Plan Update and other Warren County local land use plans.

Resolution

(Identical to the other resolutions listed in Table A-2 except for the government entity signing)

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ELK TOWNSHIP
WARREN COUNTY
PENNSYLVANIA D4-2006

A RESOLUTION AUTHORIZING COMMENT ON THE PROPOSED LAND AND RESOURCE MANAGEMENT PLAN FOR THE ALLEGHENY NATIONAL FOREST

WHEREAS, the Allegheny National Forest has published a Proposed Land and Resource Management Plan for the Allegheny National Forest; and

WHEREAS, the Allegheny National Forest has officially entered into the public comment period relative to the Proposed Land and Resource Management Plan; and

WHEREAS, the Proposed Land and Resource Management Plan presents four possible alternatives (A,B,C, and D) for public consideration; and

WHEREAS, in the Proposed Land and Resource Management Plan, the officials of the Allegheny National Forest have identified alternative C as the preferred alternative; and

WHEREAS, during the early stages as well as throughout the entire timeline of the planning process, local governments, school districts, and associated agencies were not provided with adequate opportunity for input into the planning process; and

WHEREAS, a codified system of communication relative to critical developments within the planning process, which would have fostered efficient dialogue between local governments, school districts, and affected agencies, was never developed nor implemented

WHEREAS, none of the proposed alternatives, including alternative C, sufficiently address the economic and social needs of local government entities; and

WHEREAS, in an effort to create a public response, local governments, school districts, and other interested agencies have banded together in an ad hoc format to review, assess, and address the preferred alternative C and to consider the impact of its perceived shortcomings; and

WHEREAS, the ad hoc committee recognizes the significant contributions that the Allegheny National Forest makes to local governments, school districts, and communities; and

WHEREAS, the ad hoc committee recognizes that, due to the August 28 deadline created by the Allegheny National Forest for the submission of comments on the Proposed Land and Resource Management Plan, comments must be generated and submitted in an expeditious and efficient manner; and

WHEREAS, the ad hoc committee's concerns include, but are not necessarily limited to, alternative C's lack of adequately addressing the following issues: a departed harvest schedule for timber cutting; additional alternatives for shoreline management and developed recreation; an economic analysis considering the effect of divestiture of federally owned property within the Allegheny National Forest; the effect of oil, gas, and mineral development on the forest in general, and specifically on those areas designated as potential wilderness areas; and the potential for increased motorized recreation in the Allegheny National Forest.

WHEREAS, the ad hoc committee will draft detailed comments on these issues and other issues not enumerated above prior to the August 28 deadline; and

WHEREAS, the TOWNSHIP wishes to submit comments, but only after the TOWNSHIP has reviewed the comments drafted by the ad hoc committee.

NOW THEREFORE, be it resolved that detailed comments are reserved until such time that the ad hoc committee makes its final comments and the Chairperson of ELK TOWNSHIP is empowered to approve the submission of such comments on behalf of the TOWNSHIP to the Allegheny National Forest by the August 28 deadline.

Adopted as a Resolution of ELK TOWNSHIP this 9th day of August, 2006.

ATTEST: (SEAL)

Linda C. Hittner
SECRETARY

Paul J. Lutz
Joseph A. Underwood
Mark R. [Signature]

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