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Plan Revision
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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)

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Forest Vegetation

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Habitat Diversity

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Recreation

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Special Areas including Roadless Areas and Wilderness

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Other Concerns

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.