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Allegheny National Forest
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)

- ☐ Forest Vegetation ☐ Habitat Diversity ☐ Recreation
☒ Special Areas including Roadless Areas and Wilderness
☐ Other Concerns

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

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 Therefore, the Proposed Plan must be rescinded and revised so that those proposed Wilderness Study Areas which are located in areas where the United States does not own the mineral rights are dropped and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

development.