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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)

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

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.