



WARREN COUNTY SCHOOL DISTRICT
CENTRAL ADMINISTRATIVE OFFICES
185 HOSPITAL DRIVE
WARREN PA 16365-4885

ROBERT B. TOWSEY, PH.D.
INTERIM SUPERINTENDENT

August 21, 2006

Allegheny National Forest Plan Revision
P.O. Box 36
Warren, PA 16365

To Whom It May Concern:

The Warren County School District Board of School Directors at its August 14, 2006, meeting, by resolution, authorized the Superintendent to submit comments on behalf of the Board regarding the Allegheny National Forest Plan revision. A copy of the resolution is attached along with twenty-three (23) detailed comments regarding the proposed land and resource management plan for the Allegheny National Forest, and all are being submitted prior to the August 28, 2006 deadline.

Sincerely,

Ruth A. Huck
Board Secretary

Enclosures: Board Resolution (1)
Comments on ANF Plan Revision (23)

WARREN COUNTY SCHOOL DISTRICT

RESOLUTION NO. 06-08-01

AUGUST 14, 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 WARREN CO. SD wishes to submit comments, but only after the SOLICITOR 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 Superintendent of WARREN CO. SD is empowered to approve the submission of such comments on behalf of the BOARD to the Allegheny National Forest by the August 28 deadline.

Adopted as a Resolution of BOARD OF SCHOOL DIR. this 14 day of AUGUST, 2006.

ATTEST: (SEAL)

Dick A. Chick
SECRETARY

Jaqueline Nuttall 8/14/06

Stewart & Stapleford, LLC

AUG 16 2006

Attorneys at Law

600 Market Street, Warren, Pennsylvania 16365

Arthur J. Stewart, Esquire
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Telephone: (814) 723-3445
Facsimile: (814) 723-7950

August 10, 2006

To: All Municipalities and School Districts in Elk, Forest,
McKean and Warren Counties

Dear Sir or Madame:

On July 25, 2006, our office sent you a letter indicating that the Proposed Land and Resource Management Plan for the Allegheny National Forest has been published and requesting that you pass a Resolution authorizing the Chairman (in the case of a municipality) or the Superintendent (in the case of a school district) to approve the submission of comments on the Plan **by the August 28 deadline**. In that letter I also indicated that an ad hoc committee was in the process of drafting comments and that these comments would be provided to you upon their completion. A copy of this letter has been enclosed for your convenience.

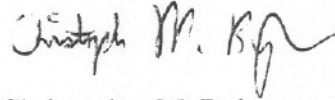
Enclosed please find the 23 comments that were created by the ad hoc committee. These comments focus on issues such as timber cutting, oil and gas development, recreation, and the planning procedure as outlined in the Code of Federal Regulations. Each of the comments is on a separate comment form and the name of the entity submitting the comment has intentionally been left blank on the forms.

In the event that you have (or will) pass the Resolution authorizing comment, please review each of the 23 comments carefully. Once you have reviewed the comments, simply fill in the name of your entity on the comments that you would like to adopt and either (1) mail the comment forms to the Allegheny National Forest, Plan Revision, P.O. Box 36, Warren, PA 16365 or (2) fax them to (814) 726-1465 **by the August 28 deadline**.

Additionally, if you would like to draft unique comments that are not included in the comments created by the ad hoc committee, our office would be glad to assist you in the drafting of such comments if need be. Thank you for your attention to this matter and, given the extraordinary economic and social impact that the Allegheny National Forest has on the four county area, the ad hoc committee (comprised of a number of local government entities) strongly encourages you to review the enclosed comments and submit those comments that you deem relevant to the interests of your entity **prior to the August 28 deadline**.

Please feel free to contact me with any questions at all regarding either the comments or the process to submit comments and we look forward to your participation in the comment process.

Very truly yours,

A handwritten signature in black ink, appearing to read "Christopher M. Byham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christopher M. Byham

CMB:lag

Enclosures

Stewart & Stapleford, LLC

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July 25, 2006

To: All Municipalities and School Districts in Elk, Forest,
McKean and Warren Counties

Ladies and Gentlemen:

As you may be aware, the Proposed Land and Resource Management Plan for the Allegheny National Forest has been published. This Plan will determine how the Forest is managed in terms of timber production, recreation, development, etc. for the foreseeable future. The Plan presents four alternative management plans and identifies alternative C as the preferred alternative.

The Code of Federal Regulations requires that local government entities be provided early, meaningful, and frequent involvement in the planning process for the Allegheny National Forest. It is the opinion of many municipalities and school districts in the area that the Proposed Land and Resource Management Plan was adopted without sufficient input from local government entities, which is unacceptable given the significant social and economic impacts that the Allegheny National Forest has on local communities.

Additionally, in 2005 a number of local government agencies passed a resolution outlining twelve points that they supported with regard to future planning for the Allegheny National Forest. To a great extent, these points were ignored by the planning team when the Proposed Land and Resource Management Plan was being developed.

Due to the fact that local government entities were not provided with the type of involvement required by the Code of Federal Regulations, an ad hoc committee comprised of a number of local government officials has identified several shortcomings in the preferred alternative C. These shortcomings 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

All Municipalities and School Districts in Elk, Forest,
McKean and Warren Counties
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July 25, 2006

as potential wilderness areas; and the potential for increased motorized recreation in the Allegheny National Forest.

We are currently in the comment period, during which time local government entities can submit input on the Proposed Land and Resource Management Plan. The Allegheny National Forest is required to consider and respond to such comments. The deadline for the submission of comments is August 28, 2006.

The ad hoc committee discussed above is currently in the process of drafting detailed comments on the plan, and specifically on alternative C of the Plan. These comments will address the areas of concern enumerated above, as well as other areas of concern not specifically listed above.

If you are interested in submitting similar comments on the Plan, the ad hoc committee asks that you please pass the enclosed Resolution at your next meeting. The Resolution authorizes the Chairman (in the case of a municipality) or the Superintendent (in the case of a school district) to approve the submission of comments by the August 28 deadline.

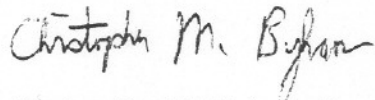
Once the Resolution has been passed, the ad hoc committee will provide you with copies of its detailed comments on the Plan and alternative C. The Chairman or Superintendent could then (1) approve the submission of these comments in their entirety, (2) choose only those comments that are relevant and submit these comments, (3) create unique comments, or (4) submit a combination of comments provided by the ad hoc committee and unique comments.

Given the extraordinary social and economic impact that the Allegheny National Forest has on Elk, Forest, McKean, and Warren Counties, the ad hoc committee strongly encourages you to adopt the Resolution and submit comments on the Proposed Land and Resource Management Plan. If a united front can be presented from a broad array of local government entities in the form of comments on the Plan, there is a greater likelihood that the Plan will have to be reformulated in order to be more consistent with the goals and objectives that local government agencies have for the Allegheny National Forest.

In the event that you would like to submit comments, please pass the enclosed Resolution and contact me as soon as possible to ensure that you receive a copy of the comments drafted by the ad hoc committee. Also, please feel free to contact me with any questions regarding the Resolution or the process for submitting comments.

I hope that this information has been helpful, and the ad hoc committee sincerely hopes that you choose to participate in the public comment process.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Christopher M. Byham". The signature is fluid and cursive, with the first name "Christopher" and last name "Byham" clearly legible.

Christopher M. Byham, Esquire

Enclosure

Mail comments to:

Allegheny National Forest
Plan Revision
PO Box 36
Warren, PA 16365

Fax comments to: 814-726-1465

E-mail to: 19_anf_fpr@fs.fed.us

Your name

Robert B. Towsey

Title (if applicable)

Super

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WARREN County School District

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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 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.

Mail comments to:

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Fax comments to: 814-726-1465

E-mail to: r9_anf_fpr@fs.fed.us

Your name ROBT. TOWSEY Title (if applicable) Supt
Organization (if applicable) WARREN County School District
Address 185 HOSPITAL DR.
City WARREN State PA ZIP 16365
Email address robert.towsey@wcsdpa.org.

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.

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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.

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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.

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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

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.

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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 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.

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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

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.

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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.

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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.

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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

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.

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☐ Special Areas including Roadless Areas and Wilderness
☐ Other Concerns

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.

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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.

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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.

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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.

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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 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.

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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.

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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.

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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 areas 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.

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| <input type="checkbox"/> Other Concerns | | |

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.

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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.

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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.

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.

Mail comments to:

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Issues in the DEIS (please check the topics you are commenting on)

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

of those that frequent the Allegheny National Forest and promote increased use and recreational development.

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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.

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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.

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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 need 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.