

December 5, 2017

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Michael J. Zamborik Region III RE: Comments to the Allegheny National Forest from the Warren County School District

The Warren County School District (WCSD) submits these comments in response to the Allegheny National Forest's announcement of its Supplemental Environmental Assessment concerning the Porkey Heights project. The items addressed in the comments below pertain to the health of the Allegheny National Forest and are sufficiently general that these comments can be regarded as applicable to other projects such as the De Young and Pine Bear projects.

The WCSD vigorously supports the expansion of the Porkey Heights project to include measures that will address the high levels of tree mortality which exist on the Allegheny National Forest. The tree mortality, and the risk that the mortality poses to the Forest, to our communities, and in particular, to our school children, are severe.

The WCSD is very aware of the declining health of the Allegheny National Forest. Last year our school district received a presentation from a professional forest consultant concerning invasive species and, in particular, the Emerald Ash Borer. In response to that presentation, and following a tour of some of the District's own timbered acreage, the WCSD engaged in a harvest of the type contemplated in the Supplemental Environmental Assessment. Further, members of our Board and administration are working with Forest Area School Superintendent, Amanda Hetrick and others, to stay informed of the work being conducted by the Allegheny National Forest-Forest Health Collaborative. It is important to note that the work of the Collaborative highlights the risk of not only the invasive species, but also the many risks associated with the lack of age class diversity on the Allegheny National Forest.

We note that the Collabortive's threat matrix regarding age class diversity says this: "many of the other threats outlined by the collaborative would benefit from a more balanced age class distribution." And we note that the same threat matrix says this: "the creation of early structural habitat is occurring far too slow."

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https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd560960.pdf. These findings are very consistent with the most recent Forest Plan, which is now ten years old. It is of serious concern that the age class diversity problem has been recognized for so very long but that it is not being remedied.

The impact of these threats falls squarely on the school children whose welfare we must nurture. Under the Weeks Act that formed the Allegheny National Forest, special consideration is given to school children. In communities where the national forest's land was removed from the tax rolls and from the potential of other tax-creating enterprises, Congress saw fit to protect the communities' school children by providing for the percentage payment of national forest revenues for local school purposes. Since timber harvest revenue makes up nearly 100% of the revenue generated by the Allegheny National Forest, the health of the Forest is intimately linked to the welfare of our school children.

For these reasons the Warren County School District absolutely concurs that the thinning projects should be changed to regeneration harvests. Indeed, the Warren County School District believes that the steps being taken by the Allegheny National Forest do not go far enough, or quickly enough, to reasonably address the problem. One can look at nearly any section of the Allegheny National Forest and see the absence of young early successional growth. Instead, wherever one looks one sees over-mature trees or trees dead and dying from invasive species. It is frustrating that so many of these over-mature and dead and dying trees are not being harvested, especially because the harvesting would yield the multiple benefits of improving forest health and safety, creating opportunities for young tree growth and improving the lack of diversity, and yielding much-needed revenue for school children.

These comments were approved by a unanimous vote of the Warren County School District Board of School Directors at its meeting conducted on December 4, 2017.

Respectfully submitted,

Board President Warren County School District Board of School Directors

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