

COMMENTS

PROCEDURE

(1) 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. These activities document “public involvement” in the planning process and do not meet the legal requirement to afford local government agencies a distinct “government to government” means of involvement.

In reality, local government agencies were not adequately involved in the planning process until several years after initial planning activities began in 1997 and resumed in 2003. Local government officials did not have any distinct forum for input into the plan until after the Need for Change items had been developed, the Notice of Intent had been published, and public workshops had been conducted to develop initial draft alternatives.

Local government agencies were not given the opportunity to be distinctly recognized and involved in the planning process until April of 2005 when Forest Supervisor Geoff Chandler began convening meetings of county commissioners, township supervisors, and school boards.

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. Involvement at these initial planning stages is critical as information gathered to determine Need For Change items play an important role in setting the parameters for the plan revision and in crafting the initial draft alternatives.

Mr. Norberry's comments accurately affirm that the lack of early, frequent, and adequate opportunities for local government agencies to be involved in this particular plan revision is a violation of both federal law and the Forest Service's own policy/operating procedure.

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 during the current plan revision process that these local entities provided official input regarding the management of the Allegheny National Forest.

Also, beginning in late 2005, the commissioners from Elk, Forest, McKean, and Warren counties began a regular series of meetings with top ANF staff to learn about the planning process and begin to provide input to ANF staff.

This considerable level of response evidences a clear desire on the part of local government entities to participate in the process and indicates that had the Code of Federal Regulations and the Forest Service's own policy/operating procedure been followed in respect to local government involvement, a large number of local government agencies would have enthusiastically participated in the planning process in the initial stages (before the finalization of Need for Change items) and consequently would have

been afforded the opportunity to affect the scope of the plan revision and the content of the draft alternatives.

Therefore, because local government agencies were deprived of their right to participate in the planning process as required by law and the Forest Service's own policy/operating procedure, the Proposed Plan must be rescinded and the planning process renewed to allow local government agencies early, frequent, and adequate opportunity to be involved during all stages of the planning process.

2) 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.

The Code of Federal Regulations specifically allows the Forest Service to include these entities as agents during the planning process and, given the expertise of these federal agencies, they should have been intricately involved in the planning process. 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 agencies can be given an adequate and early opportunity to significantly participate in the planning process as expert agencies.

3) 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, as stated on numerous occasions by ANF officials, 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 Forest grows hardwood species of a quality and value not found in any National Forest in the country. Due to these unique attributes associated with the Allegheny National Forest, a national management model 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 revised 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.

4) 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, there is little evidence that local plans were considered to any great extent during the planning process.

For example, page 97 of the 2005 Warren County Comprehensive Plan Update (WCCPU) specifically calls for the development of a resort at the Kinzua Reservoir near the Kinzua Beach area. Additionally, pages 98 and 99 of the WCCPU 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 WCCPU recognizes the lack of an adequate communications infrastructure and the need for an improved infrastructure in all areas of the county.

The federal mandates cited above require that the Proposed Plan be coordinated with and consistent with the WCCPU to the greatest extent possible. The WCCPU was drafted over a 5 year period, commencing in 2000, that included considerable public input and coincided with the time period during which the forest plan revision took place. However, there is no record of any inquiry by the ANF regarding collaboration with Warren County planning staff as the forest plan revision process took place and the proposed revised plan does not contain any Plan Objectives that are compatible with the specific recommendations of the WCCPU referenced above.

Specifically, the Proposed Plan in great part ignores the WCCPU by not listing a Plan Objective and/or new Management Areas that would support increased opportunities for highly developed recreation, by not including a Plan Objective to address the shortfall in meeting the ASQ harvests allowed in the previous plan (e.g. a “departed harvest schedule”) which would increase much need timber harvesting, and by precluding the construction of communications towers in 13 of the 15 management areas.

The WCCPU explicitly articulated the county's displeasure with the lack of local input regarding management of the ANF 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."

These sentiments appear to have been ignored by the ANF.

The above federal laws also intimate that local goals and objectives are to be taken into account during the planning process and that the Proposed Plan should reflect these local goals and objectives to 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 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.

5) 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, each these elements should be given considerable 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 and analytical materials made available to the public contain significant quantities of material concerning the ecological analysis and very little material concerning social and economic matters. For example, the Proposed Plan is fundamentally flawed because it 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. Also, the Proposed Plan does not take into account local and regional economic and

demographic trends to an extent necessary to drive the plan in a direction that intends to benefit local economies to a greater extent.

This lack of analysis makes it impossible to have appropriate discussion of the social and economic issues and coordinate a response with local and regional agencies charged with the economic well being of forest communities. 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.

Timber

6) The preferred alternative C sets the Allowable Sustained Quantity (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. The economic analysis in terms of projected 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.

However, at public forums to explain the content of the draft alternatives, the Planning Committee has admitted that, due to current budgetary constraints, it is not possible to harvest the 56 MMBF ASQ per year 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 historic and current budget data, an annual harvest volume of 25-30 MMBF per year is a realistic harvest for the ANF.

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 credible socio-economic scenario based on historic budget allocations (e.g. the last 5 years adjusted for inflation) and rational projections of future budgets as permitted by the National Forest Management Act. Further, alternatives to traditional budget and management tools, including stewardship management contracts, must be proposed in any revised plan alternatives.

7) The Proposed Plan creates the appearance that a healthier and more balanced age 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. Due to the budgetary realities cited above, it is virtually assured that the timber management required to maintain a healthy forest of the age designation targeted in the plan will not be possible. The forest will more than likely become much older than envisioned in the forest plan and suffer increased timber mortality, particularly among species with a shorter life span. This will have profound ecological and economic impacts not adequately addressed by the Proposed Plan.

For example, black cherry is currently the highest valued species 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. Black cherry is the leading species in sawtimber volume on the Allegheny National Forest, comprising over 1/3 of all growing stock. 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 facts indicate that, for obvious economic reasons, black cherry should be harvested to the greatest extent possible, while still retaining the ecological diversity and integrity of the Allegheny National Forest. Nevertheless, due to the reduced ASQ proposed in Alternative C and budgetary constraints that call into question the feasibility of implementing timber harvests forecasted under Alternative C, it is likely that significant quantities of older black cherry trees will die before they can ever be harvested.

Black cherry, which became established as a significant species on the ANF in the early 1900s, has reached physical maturity across the ANF and is already beginning to experience increased natural mortality. In addition, overly mature trees are falling victim to disease (such as red rot) and wind damage.

However, because of the proposed ASQ in Alternative C and budgetary constraints, unhealthy conditions now emerging in those stands of overly mature black cherry will accelerate. As these trees fall they pose risks to other healthy trees, become fuel for forest fires, and present a danger to recreational users of the forest. In addition, the unusually high monetary value of these trees is needlessly wasted.

In sum, the Proposed Plan's reduced rate of annual harvest will not keep pace with the annual growth and normal mortality of timber on the ANF, 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 proposed ASQ that will prevent the unnecessary waste of the valuable timber resources and attendant negative ecological and economic consequences.

8) Many reputable foresters familiar with the ANF 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.

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, a decreasing amount of early successional forest will be present, which will ultimately lead to an inadequate amount of mature timber at a later date.

This lack of mature timber will have a substantial adverse impact on the overall health and diversity of the Allegheny National Forest and in particular upon species of wildlife that require early successional habitat. 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 wildlife species that are dependent upon this habitat. Accordingly, the preferred alternative must be rescinded and revised so that, as recommended, there is a more 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 an unbalanced set of indicator species were selected, which skews the analysis of habitat types to be promoted through active vegetation management.

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. 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.

9) 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. Oak trees will not regenerate absent active management.

There are approximately 70,000 acres of forest populated with oak trees in the Allegheny National Forest. Roughly 35,000 of these acres are in areas that preclude the effective

management of oak trees. It is acknowledged that the landscape/topography of some 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.

Specifically, a large percentage of these acres are in Wilderness Areas, Remote Recreation Areas, or National Recreation Areas where harvesting is administratively prohibited. As a result the oak trees in these areas will not be managed for regeneration. As a consequence, under proposed plan Alternative C, the oak tree population within the Allegheny National Forest will decrease dramatically.

This result in turn will have significant adverse ecological and economic effects. Next to black cherry, oak is the most valuable species of saw timber on the ANF. A reduction in this timber species will clearly lead to a loss of economic value.

In addition, acorns produced by oaks are an important food source for deer and turkey. A decrease in this food source for deer could lead to further over browsing on tree saplings, which has been a serious, well-documented impediment to the regeneration of many species of trees on the ANF and could adversely affect the carrying capacity of deer and turkeys on the ANF.

The end result for management of oak trees under proposed plan Alternative C is that oak trees will no longer be managed in a manner that results in optimal ecological and economic benefits associated with these trees. 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 management areas that ensure adequate harvesting and regeneration of oak species.

10) The ANF's 1995 Timber Resource Capability Study projected that the current sustainable harvest should 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, reputable foresters believe it is possible to adequately regenerate upland hardwoods. Therefore, the Proposed Plan must be revised so that the preferred alternative proposes an ASQ of at least 72 MMBF per year, and not 56 MMBF per year.

11) The amount of revenue generated from timber sales in the Allegheny National Forest is an important revenue source for local municipalities and school districts. The projected annual timber receipts for the next two decades are considerably lower under proposed plan Alternative C than either Alternative A or Alternative B ((\$107.5 million, \$137.8 million and \$130.2 million, respectively). Alternatives A and B would, accordingly, yield approximately \$1 million per year more revenue under the traditional 25% revenue sharing program.

Aside from this direct economic impact on local governments, Alternatives A and B also are projected to sustain more employment from forest activities than Alternative C.

The four counties that comprise the ANF are in a state that is among the lowest of performers in economic growth, are within a region of the state that is the lowest performer in economic growth, and themselves are at the lowest rungs of performance in

the region. In fact, Forest County is currently designated as a “distressed county” by the Commonwealth of Pennsylvania and Warren County has led the state in recent years in net job losses.

The National Forest Management Act requires the Forest Service to draft its management plans in the context of a current analysis of local economic and demographic factors. Based on this analysis, “ attention should be paid to the uses, values, products, or services that the Forest Service is uniquely poised to provide”. As stated above, the ANF is unique among national forests in terms of the value of timber and the impact that the sale of that timber can have for the economies of the forest communities.

Given this dire economic situation and the potential of the ANF to provide substantial economic benefits to its host communities, special consideration should be made to promoting uses of the forest that maximize the economic benefit to the communities within the ANF in a manner consistent with other multiple use objectives. Alternative C is unacceptable from this stand point and the proposed plan must be revised to yield a greater economic benefit for the communities of the ANF.

12) Reports indicate that uneven-aged management practices are more costly 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. 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 without costly and intrusive measures such as fencing.

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 as to emphasize even-aged management to the greatest extent possible in order to cut costs, ensure the proliferation of the most profitable tree species in the Allegheny National Forest, and to minimize the adverse effects of over browsing by deer.

13) The Multiple Use and Sustainable Yield Act requires that the Forest Service maintain a "sustainable yield" with regard to timber harvesting and management.

The ASQ set forth in the 1986 Plan was 94.5 MMBF per year. The ANF's 1995 Timber Resource Capability Study indicated that the sustainable harvest could be as high as 72 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.

Given that the ANF's own studies demonstrate that considerably higher sustainable yields are possible than either proposed plan Alternative C or budgetary constraints will allow, the Forest Service will not maintain a "sustainable yield" as required by the Multiple Use and Sustainable Yield Act. 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".

OGM

14) The Proposed Plan designates certain management areas as Wilderness Study Areas or Remote Recreation Areas, which would normally preclude road development and timber cutting in those locations. However, in those same areas, a vast percentage of subsurface rights are privately held, which will likely lead to further road development and related timber cutting as oil and gas exploration proceeds. The Plan does not address how to reconcile this paradox in any meaningful way.

Appendix F of the Proposed Plan projects that as much as 301,000 acres (58.7%) of the 513,000 acres of the ANF, where the mineral rights are privately owned, may be under development for oil and gas production within the next 15-20 years. Overall, 93% of the subsurface rights within the ANF are privately owned and oil and gas production in the ANF currently stands at 6.5 million barrels of oil per year and 20 BCF of natural gas per year.

The Proposed Plan projects that these figures will increase to 8.7 million barrels and 28 BCF annually. 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 even more road development and a significant amount of permanent timber removal within areas designated as Wilderness Areas or Remote Recreation Areas. All of the above will preclude effective implementation of the desired Plan conditions 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 simply is not possible if oil and gas development occurs.

Therefore, the Proposed Plan must be rescinded and revised so that those proposed Wilderness Study Areas where the United States does not own the mineral rights are eliminated for consideration as Wilderness Areas. Further, Standards and Guidelines must be reinforced, where legally permissible, to protect ANF surface resources to the maximum extent (e.g. Guidelines reworded to state "must" for requirements rather than "should").

15) 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 Remote Recreation Areas or Wilderness Areas. Such a plan sets into motion a fundamental conflict between the rights to remove the privately owned oil and gas and the usage limitations inherent in Wilderness and non-motorized Remote Recreation Areas.

For example, the Proposed Plan includes a new type of management area, a Remote Recreation Area where no motorized activities are permitted. This management area overlies a future oil and gas development zone, which means that future management actions associated with remote recreation in this area will be in conflict with oil and gas development.

However, there is no discussion of how management actions might be employed to accommodate development of subsurface rights in a manner that meets the social, economic and ecological goals of the Plan. For instance, the Plan acknowledges that the increased level of subsurface development will likely bring results such as soil compaction and significant increases in road development. The Plan fails to actually analyze the consequence of these impacts.

As noted above, the non-motorized Remote Recreation and Wilderness Areas are advanced as though subsurface consequences and their attendant impacts did not exist. Also, 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. Additionally, all management areas in the Proposed Plan that overlay potential oil and gas development zones that conflict with planned management goals must be modified to include resource management objectives compatible with active oil and gas development.

RECREATION

16) Since the creation of the original ANF Forest Plan in 1986, fundamental changes in the economy have led state and local officials to recognize the need for increased tourism development to sustain rural economies. Both the Warren County Comprehensive Plan and a state initiative called the Pennsylvania Wilds call for the heightened significance of tourism development as a means to bolster local and regional economies. The Pennsylvania Wilds effort identifies the ANF as one of the premier tourism resources in the region – indeed, the ANF is the only National Forest in the Commonwealth of Pennsylvania and the rugged beauty of the Kinzua Reservoir offers unrivaled fresh water recreation and solitude.

However, a study being conducted by the Warren County Visitors' Bureau contains preliminary findings that conclude that the ANF is currently not bringing visitors to the area to an extent needed to sustain meaningful tourism development

Local officials have made the case numerous times that the ANF will simply not support a thriving tourism industry without more opportunities for highly developed recreation, lodging and supporting services and amenities. A plan commissioned by Warren County in 1963, authored by the Simmonds and Simmonds group, provided a detailed analysis of tourism opportunities on the ANF centered around the Kinzua Reservoir. Very few of the recommendations in the Simmonds plan were implemented.

In 1986 local officials retained the Stormstown Group to determine the feasibility of a resort facility on the ANF. That study, as well as a subsequent study by Gannon University MBA candidates, found that a resort facility could be sustained and would

provide positive economic impact to the region. Although supported by the ANF Supervisor, the resort proposal was rejected by the Regional Forester for procedural reasons.

Since beginning to meet with the ANF planning team in 2005, the Warren County Commissioners have repeatedly made the case that more highly developed recreation, lodging, and other facilities targeted at attracting visitors are critically needed on the ANF. However, the Desired Condition stated in the Proposed Plan does not envision anything other than the status quo regarding use of the forest by visitors. Consequently, the Proposed Plan contains no Objectives or changes in Management Areas that would support anything other than a continuation of current uses of the forest and certainly no advancement toward providing additional opportunities for highly developed recreation and lodging. Not one additional acre of the ANF has been made available to meet the needs local officials see for tourism development. Yet, the Proposed Plan creates new “Remote Recreation” management areas and “Wilderness Study” areas, together comprising over 44,000 acres.

Due to this imbalance in recreational uses, lack of responsiveness to local officials as well as incompatibility with local and regional planning efforts pertaining to tourism development, the Proposed Plan must be revised to state a Desired Condition that envisions enhancement of the entire range of opportunities for visitors to enjoy and make use of the ANF, particularly in terms of highly developed recreation and lodging. In addition, plan Objectives must be created to support the Desired Condition and, most importantly, additional Management Areas (MA 7.1) must be identified in the Proposed Plan that would support new uses attuned to tourism development, particularly in the

vicinity of the Kinzua Reservoir. Merely stating that the ANF will conduct a recreation study *subsequent* to adoption of the Final Plan does not serve as a proxy for what should be in the Plan. Rather, the to-be-conducted study should add the detail necessary to move toward implementation of Objectives and examine site specific uses within Management Areas already determined by the Plan.

17) The Pennsylvania Wilderness Act of 1984 (16 USC § 460qq) designated approximately 23,100 acres as the Allegheny National Recreation Area (NRA). The Act required the Forest Service to prepare a management plan for the use of the NRA which could be “prepared in conjunction with, or incorporated with, ongoing planning for the Allegheny National Forest”. ANF officials have acknowledged that, some 22 years later, such a plan required by Congress has never been developed for the Allegheny NRA. Even now, as the opportunity has occurred for a management plan to be written “in conjunction with” the forest plan revision, no plan for the NRA has been developed. Instead, the Proposed Plan contains a single management Objective for the NRA – to “write a specific management plan for the NRA *within five years*” (emphasis supplied). This is an unacceptable violation of the Pennsylvania Wilderness Act.

For 22 years, users of the ANF have had their right to use the Allegheny NRA (MA 8.2) unilaterally dictated by the Forest Service, without any public involvement in creating a management plan for the NRA. As a result, although the Pennsylvania Wilderness Act does not explicitly prohibit certain forms of recreational use in the NRA (e.g. snowmobiling), the ANF has imposed its own restrictive management regimen in the absence of the legal required management plan.

Moreover, conversion of existing NRA acreage (i.e. Tracy Ridge) to Wilderness Study Area without ever having created a management plan for the NRA is not acceptable. Without the benefit of having the NRA managed to maximize the beneficial use of the area for all forms of recreation, as Congress intended, the Forest Service proposes through the plan revision to potentially further restrict use of these public lands by managing them as Wilderness.

This unacceptable situation must be corrected by revising the Plan to incorporate a full management plan for the Allegheny NRA. Waiting until *after* adoption of the revised Forest Plan to create a management plan for the NRA and in the mean time converting part of the NRA to a Wilderness Study Area only furthers the illegal status of the Forest Service's management of the NRA.

18) The 1986 Forest Plan envisioned that the ATV/OHV trail system would grow to 350 miles. This has not occurred and instead the trail system consists of just 108 miles of trails, inadequately sized trail head areas, and a lack of connector trails to link motorized recreation to gas stations, lodging, restaurants, and other commercial services that would magnify the economic impact for local economies.

Many local restaurants and other businesses within easy reach of the motorized trail system have closed in recent years that could have thrived if trail connectors were in place. In addition, during periods of heavy use motorized trail users frequently are forced to park along highways, leading to unsafe conditions due to undersized trail head areas.

Moreover, in a manner atypical with other national forests, snowmobiles have been unduly restricted to a trail system that does not include fuller use of forest roads and right of way areas that would not be suitable for other motorized uses. In most respects,

snowmobiles seem to be treated as if their impact on the forest is similar to ATV and OHV use when that is clearly not the case.

In recent years, ATV/OHV and snowmobile 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. ATV/OHV and snowmobile 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 this use is \$17 million annually.

In recognition of this economic benefit, the 12 Point Resolutions adopted by 19 municipalities, 3 Local Development Districts of the Appalachian Regional Commission, and a number of school districts echoed the 1986 Forest Plan's desire to create additional ATV trails within the Intensive Use Areas on the Allegheny National Forest. While short of the 350 miles as expressed in the 1986 plan, the 12 Point Resolution called for ATV trail mileage to be increased to 300 miles, an amount that would nearly triple the current system's capacity.

Despite the Proposed Plan's Goal of increasing the "quality and quantity of motorized trail riding opportunities", this Goal is not supported by the Proposed Plan Alternative C, which actually reduces both the number of Intensive Use Areas available for ATV/OHV trail development and reduces the total number of acres in those areas.

Conversely, the Proposed Plan states that an increase in non-motorized recreation is not expected to occur during the planning period, yet the Preferred Alternative C designates tens of thousands of acres as Remote Recreation and Wilderness Study areas,

which are only conducive to non-motorized recreation. Also, as stated above, no management plan exists for the Allegheny NRA and motorized recreation has been arbitrarily restricted in the NRA by the Forest Service on these 23,100 acres.

The Proposed Plan must be revised to specifically state a Desired Condition, Goals, and Objectives, that support increased motorized recreation on the ANF by making additional acreage available for trail development and changing Standards, Guidelines, and other elements of the Proposed Plan, including those pertaining to the Allegheny NRA, to allow increased use of forest service roads and right of way areas for snowmobiles. In addition, trails heads must be enlarged and designated as M.A. 7.1 to permit additional, specially designed facilities to be sited at trail heads that benefit equine, snowmobile, and ATV/OHV users.

19) In recent years a number of competitive events have developed and continue to increase in popularity for which the ANF is an extremely attractive venue. These events include cross country skiing, snowshoeing, dog sledding, mountain biking, road biking, triathlon, and adventure race competitions. It has been the experience of local event organizers that the vast majority of competitors for these events travel from outside of the region and create a positive economic impact and more exposure to support tourism promotion of the ANF.

Portions of the Proposed Plan that prohibit special use permits for competitive recreation events must be revised to allow for the issuance of special use permits for *non-motorized* competitive recreation events in all management areas. Otherwise, established events, such as the Kinzua Country Tango held in part in an area to be designated as

Remote Recreation, will be jeopardized and the ability to develop new events will be significantly curtailed.

OTHER

20) It has been evident that the federal government has not made the financial resources available to effectively manage the entire acreage contained in the Allegheny National Forest, as shown by the inability of the ANF to complete scheduled timber harvests and the deterioration of ANF recreation facilities and forest roads. The Proposed Plan bears an admission of this situation by listing an Objective to “reduce backlogged and deferred maintenance by 10 percent annually”. Moreover, in order for the ANF to make the desired contribution to local economies, it is not enough to perform “maintenance”; new investments in forest infrastructure and management capabilities are needed.

Therefore, the Plan should be revised to recognize the gap between Plan Objectives and the resources available to meet those Objectives. This can be accomplished by identifying and expressing the desire to utilize alternative management tools, such as stewardship contracts, partnerships with other government agencies (in particular state and local governments), and private sector leases – all practices utilized throughout the Forest Service system – that will increase the level of resources available to the ANF.

21) 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 National Forest. Therefore, rather than modifying the Plan at a later date, the Proposed Plan must be rescinded and revised so that all management areas will allow for the construction and placement of communications towers. This will better ensure the safety of those that frequent the Allegheny National Forest and promote increased use and recreational development.

22) The National Forest Management Act 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 actual implementation of the Plan. To our knowledge, no such monitoring plan or a codified protocol for government to government communications regarding the monitoring plan exists, nor does the proposed plan revision.

Local government agencies have specialized knowledge related to the performance of local economies that are essential to an accurate analysis of the impact of the Forest Plan. Therefore, the proposed plan must be revised to expressly provide for a formal means of ongoing government to government communication throughout the life of the Plan.