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Allegheny Forest Alliance

Winter 2003 Newsletter

Straying from our typical format, the AFA has some important issues to present to our readers. It is our hope that armed with this information and points of view, our readers may make an informed submission to the public comment phases of public policy.

AFA Action Alert 1..... Categorical Exclusions

COMMENTS MUST BE SENT BY Monday, March 10, 2003

On January 7, 2003, the Bush Administration announced its intent to create three (3) categories of "Categorical Exclusions" designed to give the agency the ability to respond in a timely manner to forest health needs and bypass environmental studies and assessments, when no negligible environmental impacts have been identified. This action establishes the following categories:

- **Category 10** – Harvest of live trees not to exceed 50 acres, requiring no more than ½ mile of temporary road construction. This will be primarily used for the commercial thinning to increase health, fuel wood products, and to reduce fuel loading in overstocked stands.
- **Category 11** – Salvage of dead or dying trees not to exceed 250 acres, requiring no more than ½ mile of temporary road construction. To be used to remove trees damaged by fire, or a wind or ice event.
- **Category 12** – Sanitation harvest of trees to control insects or disease not to exceed 250 acres, and requiring no more than ½ mile of temporary road construction. This may require removal of adjacent green trees to control the spread of insects and disease.

Send comments to the USFS and USDA supporting these changes to:

Limited Timber Harvest
U.S. Forest Service – CAT
U.S. Department of Agriculture
P.O. Box 221090
Salt Lake City, UT 84122
Or by FAX to: (801) 517-1014

Or via e-mail to: limitedtimber@fs.fed.us

AFA Action Alert 2..... Forest Service Planning Rules

PUBLIC COMMENT IS NEEDED BEFORE MARCH 6, 2003

The Bush Administration is proposing changes to the 2000 USDA FS Planning Rules. The proposed rules were published in the *Federal Register* on December 6, 2002, allowing 90 days for comment.

Points for consideration may include the following:

- **The Forest Service is facing a grave forest health crisis.** The Administration's new proposal will better prepare the Forest Service to begin addressing critical issues such as

catastrophic fires and insect infestation and disease affecting nearly 40% of our national forests.

- **Returning forest managers to the forest.** The Forest Service estimates it spends 40% of its budget and man-hours in court rather than managing the forests. The proposed revisions will direct more resources toward forest health issues where they are urgently needed.
- **The 2000 Rules are technically impossible to meet.** The new rule contains definitions and analytical requirements that are unrealistic if not impossible to meet. Issues such as population monitoring, species viability, ecological sustainability, and many others are unworkable.
- **The federal land managers are drowning in paperwork and red tape.** The Forest Service, recognizing delay only exacerbates the forest health crisis, is attempting to streamline the regulatory process so environmentally responsible, scientifically-based forest plans can move forward.
- **The 2000 Rules are too cumbersome and therefore too costly to implement.** The 2000 Rules contain more process and procedures than do the 1982 Rules, which took far too long to implement. Therefore, it is reasonable to conclude the new Rules would cause even more delay and be far more costly to implement than the 1982 Rule.
- **Gridlock created by the 2000 Rules drastically reduce critical habitat.** More wildlife species inhabit early successional forests (0-20 years) than any other. Forest management neglect has put many species at risk. The new rules will help address that critical issue.

Written comments may be mailed to: USDA FS Planning Rules, Content Analysis Team, P.O. Box 8359, Missoula, MT 59807; or via e-mail to planning_rule@fs.fed.us; or by fax to Planning Rule Comments at (406) 329-3556. (All comments must include the name and address of the provider)

For further information contact: Jody Sutton, Content Analysis Team Program Coordinator, Forest Service, (801) 517-1023.

Action Alert 3..... Paralysis by Analysis

COMMENT IS REQUIRED ON OR BEFORE 2/18/03

The US Forest Service is seeking comments on a very important piece of proposed regulation designed to address the gridlock problem, or as had been referred by Chief Dale Bosworth as "paralysis by analysis."

This new proposal would significantly amend the rule adopted in 1994 for the notice, comment, and appeal procedures for a project as well as activities implementing land and resource management plans on the National Forest system lands.

Comments of the "Regulations on Notice, Comments and Appeal of Projects" initiative as published in **67 Federal Register** (77011) are to sent to:

USDA FS Appeal Rule Content Analysis Team

P.O. Box 9079

Missoula, MT 59807

Or may be faxed to: **(406) 329-3556**

Or e-mailed to: **215appeals@fs.fed.us**

Will We Be Better Off?

By Jack Hedlund, AFA Executive Director

Often we hear that ending commercial logging and mineral extraction from the ANF will have

little or no impact on the economy of the region. In fact, enhancing tourism and retraining displaced forest industry folks are viewed by some as being a benefit to our struggling economy. For those who harbor such thoughts, I offer two interesting studies for review.

Dr. Robert Lee, a social science professor at the University of Washington, studied the economic ramifications of the “1994 Northwest Forest Plan,” which drastically reduced logging on federal land in the Pacific Northwest to protect the spotted owl. In a nutshell, the study reports that “social capital” (defined as working collaboratively to build trust in the production of something beneficial to all) as well as earnings declined dramatically. Demographics shifted from a citizenry of moderate income to a predominance of retirees and service workers, including a substantial influx of migrants. The tourism industry, hailed as a worthy replacement, actually trapped local residents in a downward spiraling economy. It was heavily dependent upon the whims of Mother Nature and offered jobs requiring little skill. Educational expectations dropped precipitously causing schools to under-perform. Substance abuse rose rapidly from the hopelessness of the socio-economic situation, a glowing picture, indeed.

The second study was released last month by a non-profit California think-tank called *Forest Community Research*. The report was two years in the making and was funded jointly by the U.S. Bureau of Land Management, Forest Service, non-profit foundations and others costing \$600,000. A summary of the report concludes that much of the \$1.2 billion pledge by the Clinton Administration to re-train loggers and assist their communities with adjustment after the collapse of the timber harvesting industry failed miserably. Interestingly, 85% of the money was not new money at all, but rather re-package funding already earmarked for a variety of other regional projects. The long and short of it all, many moved out of the area and those that

remained were forced to accept low-paying service jobs.

Does this really sound like a success formula for our region, currently facing a similar fate? I think not!

East Side Project Gets Green Tag

After nearly a year of auditing by Ken Kane, certified forester with Keith Horn, Inc. the report is complete on the East Side Project. And the news is encouraging.

You may recall the **AFA** authorized an audit of the East Side Project by an Association of Consulting Foresters (ACF) representative to determine if the negative press reported by various preservationist groups was indeed true. The Allegheny National Forest was billed as being the “most endangered national forest in the East” primarily because of the “8,000 acre clear-cut” as the East Side Project was described. The results of the comprehensive, independent audit disprove the allegation.

Green Tag Certification measures the extent to which a project complies with ten specific principles, further defined by 46 criteria. The principles are:

- Forest Planning and Management
- Forest Health, Inventory and Natural Diversity
- Logging, Post Harvest Evaluation and Reforestation
- Road Construction, Stream Crossings, Protection of Special Sites
- Product Utilization and Aesthetics
- Chemical Utilization
- Community and Social Relations
- Economic Viability
- Record Keeping and Tracking
- Commitment to Sustainability

The USFS cannot seek or promote third party certification primarily because it is bound by law

to pursue “best management practices.” The plaintiffs charge the law is being violated while the AFA contends that the FS is in compliance. The audit confirms our belief.

While the audit indicates the FS does indeed pursue “best management practices,” it is failing in its obligation to achieve sustainability, particularly with regard to the globally unique ecosystem existing on the ANF. Following extensive clear cutting at the turn of the 20th century, Allegheny Hardwoods evolved as the dominant forest type. Through lack of management and/or neglect the FS is now allowing for a reversion to less valuable Northern Hardwoods, which are hardly unique. This circumstance affects the local economy as well as the ecosystem as the report indicates.

An official announcement will be made early this spring as the ANF becomes only the second national forest to be independently certified.

Consider Eastern Forests, Too; AFA Influences National Policy

The AFA has forged a cooperative arrangement with the “National Hardwood Lumber Association” (NHLA) to provide input for President Bush’s forest planning initiative. In order to make the initiative nationwide in scope, eastern issues needed more emphasis to counter-balance the higher profile western issues. The NHLA sought issues from AFA and its membership that are unique to the eastern forests.

Some issues that received mention were the de-emphasis and huge reduction of ASQ (Allowable Sale Quantity) in eastern planning, forest health issues created by exotic specie infestation (beech and hemlock in particular), the need for more intense management due to shorter harvest rotation and greater population density, and mismanagement/neglect by the FS regarding perpetuation of the unique ecosystem

that has evolved on the Allegheny Plateau over the past 80-100 years.

These and other issues are expected to receive some attention when the final “Forest Health Initiative” is laid out by the Bush Administration.

Wilderness Talking Points

The following points deserve thorough consideration when determining the merits of more wilderness on the ANF. In addition, other points appear on the AFA website.

1. Decisions regarding additional wilderness must be market-based.
 - a. Wilderness attacks less than 1% of recreational visitor days (RVD) nationwide
 - b. Only 2% of the population ever visits a wilderness.
 - c. Wilderness designation excludes all resource extraction.
 - d. Wilderness is roadless when 99% of RVD is on roaded areas.
 - e. Wilderness promotes only the most primitive recreation.
 - f. Typical wildernists bring their amenities with them, do not purchase locally.
 - g. A typical wilderness visit is one day or less.
 - h. Nationally, as wilderness acreage has increased, use per acre has decreased.
 - i. The federal government spends over one hundred millions dollars annually maintaining wilderness with no economic return.
2. Why target PA?
 - a. The 18% national average is highly skewed and irrelevant
 - 1) 95.3% of all protected wilderness exists in 12 western states.

2) 56% is in Alaska alone.

3) Only 4.7% of all national wilderness lies east of the 100th meridian.

b. Seven states do not have any wilderness including PA neighbors MD and DE.

c. PA neighbors NY and OH have less than 0.01% of wilderness.

d. Dense population and wilderness are incompatible by definition.

3. Wilderness is legally indefensible, multiple use and sustained yield becomes no use and no yield.

4. Friends of Allegheny Wilderness (FAW) is concentrating on MAs 6.1, 6.2, and 6.4, which

are integral to proper forest management and multiple use.

5. Ecosystem stability is threatened in wilderness through benign neglect, causing the biotic community to self-destruct.

6. Wildlife species favor early successional forest over old growth nearly 4 to 1.

7. DCNR maintains 229,000 wilderness-like acres (“wild” or “natural” areas.)

8. Wilderness is a prelude to the creation of wildlands.

9. Recreation loses more money than any other activity on federal land, less than 15 cents earned for every dollar spent.

ALLEGHENY FOREST ALLIANCE:

Phone: 814-837-9249

Email: afa@penn.com

Web: www.renewableforests.com

Reminder: Keep your membership current. Payment helps to ensure that your voice is represented in advocating multiple use of the Allegheny National Forest and other public lands. Thank you!

Allegheny Forest Alliance
22 Greeves Street
Kane, PA 16735

