Commenting on ANF Projects:

How can you effectively comment on ANF vegetation management projects?

Most vegetation management projects on the ANF are developed using a standard process:

- An area to manage is identified and data on stand conditions are gathered.
- A silviculturist reviews the data and field conditions to develop a proposal.
- The proposal is surveyed and refined by a team of resource specialists.
- 4. The proposal is scoped.
 Referred to as scoping, the ANF summarizes key information about the proposed action, contacts interested parties, and typically asks for comments back within 30 days.

Schedule of Proposed Actions (SOPA) 04/01/2019 to 06/30/2019

This report contains the best available information at the time of publication. Questions may be directed to the Project Contact.

Report Contents (click to jump to a section):

- R9 Eastern Region, Allegheny, National Forest, Forestwide (excluding Projects occurring in more than one Forest)
- R9 Eastern Region, Allegheny, National Forest, Bradford Ranger District (excluding Projects occurring in more than one District).
 R9 Eastern Region, Allegheny, National Forest, Marienville Ranger District (excluding Projects occurring in more than one District).

Allegheny National Forest, Forestwide (excluding Projects occurring in more than one Forest)								
Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact			
Penelec First Energy Special Use Renewal CE	- Special use management	In Progress: Scoping Start 03/08/2019	Expected:05/2019	05/2019	Wendy Andersen 814-728-6165 wandersen@fs.fed.us			
NEW LISTING	Description: Reissue six expired special use permits authorizing approximately 68.6 miles of electric transmission lines, electric distribution lines, and related facilities. If approved, the permits will be consolidated into 2 permits issued for a 30 year term. Web Link: http://www.fs.usda.gov/project/?project=55514							
	Location: UNIT - Allegheny National Forest All Units. STATE - Pennsylvania. COUNTY - Elk, Forest, McKean, Warren. LEGAL - Not Applicable. Elk, Forest, McKean, and Warren Counties, Pennsylvania.							

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Allegheny National Forest, Bradford Ranger District (excluding Projects occurring in more than one District)							
Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact		
Bradford Forest Restoration Project EA *UPDATED*	- Forest products - Vegetation management (other than forest products) - Road management	In Progress: Objection Period Legal Notice 09/18/2017	Expected:09/2019 Actual: 12/11/2018	09/2019	Richard Hatfield 814-363-6098 rhatfield@fs.fed.us		
	Description: Regenerate declining stands of Allegheny hardwood through tree harvesting and reforestation activities, removal of nonnative invasive plants, and road management activities. Web Link: http://www.fs.usda.gov/project/?project=47650 Location: UNIT - Bradford Ranger District. STATE - Pennsylvania. COUNTY - Forest, McKean, Warren. LEGAL - Not Applicable Warrants 2735, 2877, 4634, 4702, 4712, 4713, 4732, 4738, and 4739 of Sheffield Township and warrants 3195, 3198, 3211, 323 3235, 3238, 3239, and 3240 of Cherry Grove Township, Warren County; warran.						
Cherry Run EA *NEW LISTING*	Land management planning Forest products Vegetation management (other than forest products)	In Progress: Scoping Start 03/20/2019 Est. Comment Period Public Notice 06/2019	Expected:11/2019	11/2019	Richard Hatfield 814-363-6098 rhatfield@fs.fed.us		
	Description: The Forest Service, Allegheny National Forest (ANF) proposes the Cherry Run Project to improve forest streams and fisheries, and wildlife habitat within the 7,578 acre project area, within Sheffield Township, Warren County Pennsylvania.						

Example of a SOPA (Schedule of Proposed Actions Report) available on the ANF website.

- 5. The proposal's effects on natural resources are analyzed in an environmental assessment.
- The environmental assessment is completed. Referred to as the <u>environmental assessment com-</u> <u>ment period</u>, the ANF releases its analysis for review, informs interested parties, and asks for comments back within 30 days.
- 7. A decision on the proposal is made.

Comments may request changes to the proposed action, request clarification or ask questions, and/or serve as general expressions of support or disagreement. Comments received during either scoping or the environmental assessment comment period are most helpful if they:

- are submitted in **writing**, within the **requested time periods**;
- give site-specific detail regarding the effects of our proposal at specific locations on specific resources;
- identify different activities or implementation methods to consider in resolving identified concerns; and
- provide references to supporting data and scientific literature.



Commenting on ANF Projects (cont'n):



These types of comments receive substantial consideration in project development. Below are some tips and examples:

Good comments:

- Focus on the proposed action or some specific aspect of the analysis;
- Provide additional information we may have missed or show material defects in our analysis or proposal;
- Are written coherently;
- Help with solutions and legitimate, concrete actions that we could pursue.

Scenario:

A member of the public expressed concerns during scoping (step 4 above) regarding our management of age class imbalance and specifically an area proposed to be managed for late structural habitat. When they review the EA, they still feel like the proposed action could benefit by including some trees within close proximity to the proposed project boundary (step 6 above). They identify specific stands and topography, discuss how the proposed action, if modified, could help meet Forest Plan objectives and ask if previously approved decisions may be sufficient to cover this addition. In response, the ANF reviews the proposed changes, notes that this would be permissible under the current plan, help meet forest objectives, and that the area has recent, previously approved wildlife and heritage surveys. We provide responses to the comments and move forward with a decision that approves the action, which has been modified based on the responder's comments.

Not-so-good comments:

- Broad-scale, sweeping generalizations e.g., "cutting trees down is bad."
- Off-topic or not project specific; e.g., "any blading of roads, anywhere, is a significant impact."
- Discourteous or invective; e.g., "I hate the Forest Service."
- Can't be verified; e.g., "my sources say..." with no sources provided.

Scenario:

We receive a comment from an individual who expresses their opinion that timber harvesting (in general) has a "catastrophic" impact on nature-based recreation and will "irrevocably" harm the habitat quality needed for species viability. They claim that cheat grass is ruining the rangelands in the Western U.S. and that they believe all lands held in federal ownership should be turned over to the local counties. They cite no literature or references and misidentify the proposed action. The ANF would respond to this comment by clarifying the nature of the project and citing analyses that pertain to project specific impact but no changes would be made to the document or the proposed action.

Considerations to keep in mind:

- Adding more vegetation management to a proposal could be challenging to accommodate on a large scale given field work is generally already completed before scoping;
- Substantially increasing our proposal could delay a final decision and take staff away from work on the next project;
- Instead of waiting for us to request comments, you can work with us during the earlier stages of proposal development.