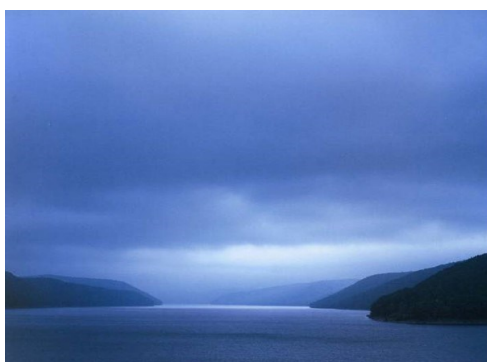


Sustainable ANF, Stable Communities



*ANF - A Land
of Many Uses*



***Understanding Sustainable Forestry
on the Allegheny National Forest
and the Connection to
Economically Stable Communities***

An education publication of the Allegheny Forest Alliance.

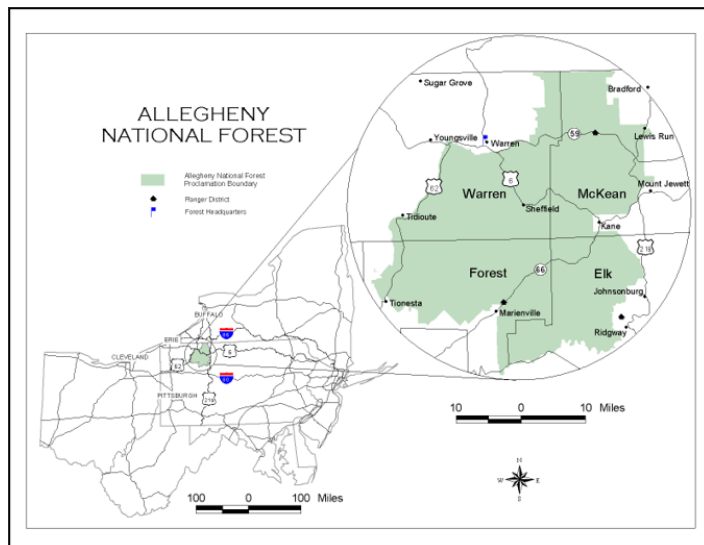
About the Allegheny National Forest

The Allegheny National Forest (ANF), established in 1923, is approximately 517,000 acres in size, and includes land in Elk, Forest, McKean and Warren counties. Approximately 463,000 acres are forested, 42,000 acres are non-forest, and 11,000 acres are covered by water. The Allegheny Reservoir, created by the U.S. Army Corps of Engineers' Kinzua Dam, falls within the ANF and impounds over 12,000 acres. The reservoir is a focal point for water-based activities and developed recreation areas on the ANF.

The ANF is headquartered in Warren, PA, and is administratively divided into two Ranger Districts—the Bradford (north) and the Marienville (south).

The Forest includes two Wilderness areas, two National Scenic Areas, two National Wild and Scenic Rivers, and the Tionesta Research Natural Area (the largest contiguous tract of old growth forest in Pennsylvania). Popular recreation activities include boating, camping, mountain biking, hunting, fishing, ATV riding and snowmobiling.

The ANF is widely known for its production of high quality hardwoods—specifically black cherry (*Prunus serotina*)—and its extensive, privately-owned oil and gas developments.



About the Allegheny Forest Alliance

The Allegheny Forest Alliance (AFA) is a non-profit, membership-based coalition of local governments, schools, businesses, organizations, and individuals who are concerned about the health of the Allegheny National Forest and the welfare of its host communities. Its purpose is to support sustainable forestry, environmental stewardship, and multiple-use management of the ANF to assure that this significant section of forestland will be here, productive, and accessible for the continued use and benefit of future generations.

Our work includes monitoring state and federal legislation and policy proposals and responding with comment letters; working with legislators on solutions to forest and community needs; holding educational events for the public, elected officials and students; creating informative and educational publications and teaching tools (such as this booklet); publishing a newsletter with information relevant to public lands management, community impacts, forest threats and AFA efforts; and more. Partnerships with the ANF, Allegheny Forest Health Collaborative, Allegheny Hardwood Utilization Group, and other regional, state, and national organizations and agencies help the AFA achieve more.

Support from school Districts and municipalities, and membership fees from individuals and businesses, fund the AFA's efforts. Visit www.alleghenyforestalliance.org to learn more about issues, AFA efforts, and becoming a member to help us advocate for a healthier ANF and more stable communities.

Origins of the Allegheny National Forest

THE PRE-SETTLEMENT FOREST WAS COMPOSITIONALLY DIFFERENT THAN THE FOREST WE KNOW TODAY

Prior to Euro American settlement, the Allegheny Plateau was a vast forest dominated by eastern hemlock and American beech growing on the plateau and upland drainages. Large white pine and oaks grew along the slopes and bottoms of the Allegheny River valley. New tree seedlings could regenerate in the shade of these trees, and would claim the free growing space when large trees died.

Early humans living in what is now the Allegheny National Forest relied on the land for survival. Hunting, fishing, and gathering were the prominent land uses of the Archaic period (ca. 8,000 B.C. - 500 B.C.). Horticulture became increasingly prominent during the Woodland period (ca. 500 B.C.- A.D. 1650), and by about A.D. 135, horticulture was being extensively practiced by the Iroquois Confederacy to the north. It's believed that the Iroquois, in order to create open areas, cleared and burned the forests, creating a mosaic landscape of varying forest ages. This pattern of land use influenced the composition of the forest.



THE HISTORY OF FORESTS STRONGLY AFFECT THEIR CONDITION TODAY

Today's forest originated after widespread near complete harvests that occurred from the late 1800s to the early 1900s to meet our growing nation's needs. This disturbance created a younger, even-aged forest that has matured into the forest we know today, which is predominantly the same age (even-aged), and mature (100+ years old). This condition is often referred to as an unbalanced age class. The species that do best in

high light environments, e.g. black cherry, red maple, white ash and yellow-poplar, are the ones that regenerated after both the Native American and late 1800s to early 1900s clearcuts.

In 1927, a clearcut resulting from the first timber sale on the ANF became the first research study area. These photos, taken over time from the same vantage point in the Little Arnot area, show this forest's regeneration.



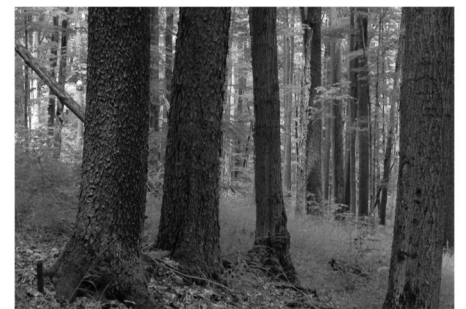
1927



1948



1998



2018

See more of this story at: <https://www.fs.usda.gov/detail/allegheny/learning/history-culture/?cid=fseprd1087590>

Forest Health Challenges on the ANF

In recent years, the forest has been impacted by multiple forest health concerns, including:

- Invasive Pests, e.g., Spongy moth, Emerald Ash Borer, Hemlock Woolly Adelgid
- Native defoliators, e.g., cherry scallop shell moth and fall webworm

- Diseases, e.g., Beech Bark Disease, Beech Leaf Disease, Sugar maple decline, Black Cherry Decline
- The persistent spread of non-native plants, e.g., glossy and common buckthorn
- Preferential deer browsing



Emerald Ash Borer



Spongy Moth Larva



Hemlock Woolly Adelgid.



Beech Bark Disease



Glossy Buckthorn



Garlic Mustard



Hay scented fern



Japanese Stilt Grass

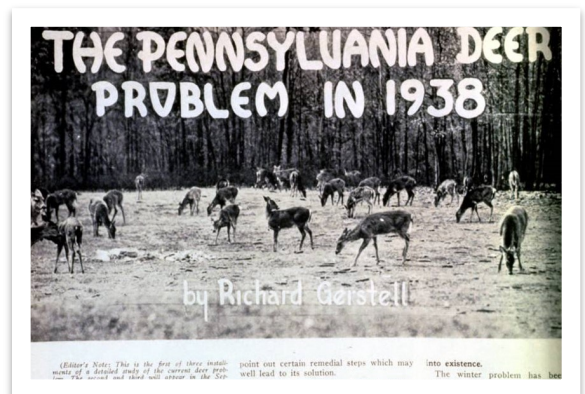


Japanese Knotweed



Multiflora Rose

Preferential deer browsing has strongly influenced forest vegetation on the ANF since the 1930s. Deer density was above 20 deer per square mile for more than 6 decades (from the late 1920s through 2000), resulting in forest understories devoid of desirable tree seedling regeneration and dominated by invasive plants less preferred by deer, such as hay scented fern, beech brush, and striped maple.



By 1940, deer densities had reached 45 deer per square mile.

Non-native invasive species seriously alter the landscape and disrupt critical ecosystem functions. The result can be loss and destruction of forage and/or habitat for wildlife/fish/plants (e.g., inadequate nutrition for birds' migratory flights), reduced groundwater levels, soil degradation, increased risk of devastating wildfires, diminished land values, lost forest productivity, and diminished recreational enjoyment.

How the USFS Treats Forest Health Threats



Land managers continually assess the existing condition of the forest and prescribe treatments to enhance it's resilience. Treatments include ...



Implementing prescribed fire treatments to regenerate desired trees.



Planting trees to enhance species diversity.



Harvesting trees to free growing space for new trees.



Chemical treatments to control interfering plants, and outbreaks of problematic insects.



Treatments to protect and enhance the growth of new trees.

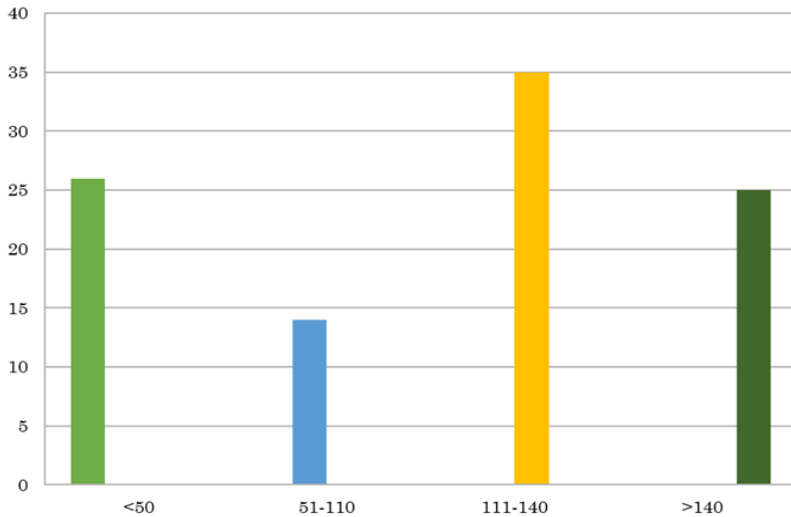


What is Age Class Balance?

What the US Forest Service wants the age of trees to be:

The Allegheny National Forest updates their Land Resource Management Plan (LRMP) every 15 years to guide their management activities. The most recent revision was completed in 2007.

2007 Forest Plan Desired Condition



A section of forest with an even distribution of age classes: 1/3 in early regeneration, 1/3 in mid structural (young trees), and 1/3 in late structural (mature trees).

Early-aged trees are tomorrow's forest and are great cover for wildlife.

On the ANF, trees are ready for harvest at about 80 years of age.

These trees still have harvest and habitat value, and also shade the forest floor.

These trees provide habitat for certain animals and plants.

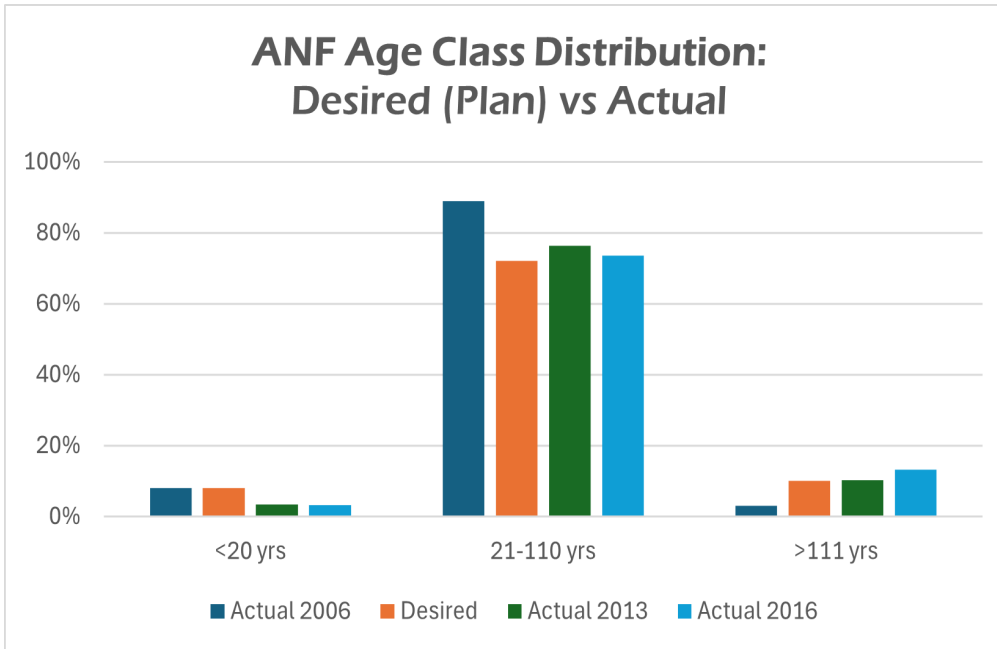
"In the longer term, if even-aged and uneven-aged regeneration harvests continue to be lower than the stated objectives, landscape-level desired vegetative structural stages and age classes will not be sustained at levels sufficient to meet desired Forest Plan ecosystem conditions. In fact, the longer implementation rates are below those listed in Forest Plan objectives, the more skewed age class distribution will become.

Recommendations – It is recommended to increase regeneration treatments on the ANF in order to move forest age class and structural stage distribution toward desired conditions in the Forest Plan.

- ANF Monitoring and Evaluation Report FY 2008—FY 2013

What is Age Class Imbalance?

What the age class actually is on the ANF (as of 2007 Forest Plan):



“Presently, approximately 3.4% of the ANF, or less than half of that desired, is in an early structural condition (less than 20 years old).”

*ANF Monitoring and Evaluation Report
FY 2008—FY 2013*

The chart at left shows that this imbalance has worsened since the Forest Plan was developed

There are not enough young trees to stock the forest into the future.

Too many trees in the 21-110 and >111 age classes shade the forest floor and prevent the growth of new trees.



Age class imbalance is illustrated here with too many large trees shading the forest floor, preventing light from reaching seedlings and using nutrients that the young trees need. Sustainable forest management harvests mature trees and allows perpetual regeneration of the forest.

“The age class distribution of the ANF is very imbalanced.” The severity is “very significant.”

- ANF Forest Health Collaborative (2017)

What Age Imbalance Looks Like:

This forester is pointing out two dying trees that should be harvested. There are no seedlings around his feet because the mature trees block the sun. These trees can be harvested to:

- 1) Free-up growing space for seedlings, and
- 2) Harvest the revenue from the trees

A portion of ANF timber harvest revenue goes to the counties in lieu of property tax, and the remaining funds are used to fund work on the ANF, e.g., road grading, culvert replacements, tree planting, timber stand improvement treatments, treatment of invasive plants, pests and diseases, etc.



This image shows a stand in the early successional age class. It is a young forest with few trees over 30 feet tall and grasses, shrubs and trees that provide food and cover for wildlife.

There is too little early successional growth on the ANF, due to insufficient harvest over the last 20+ years.



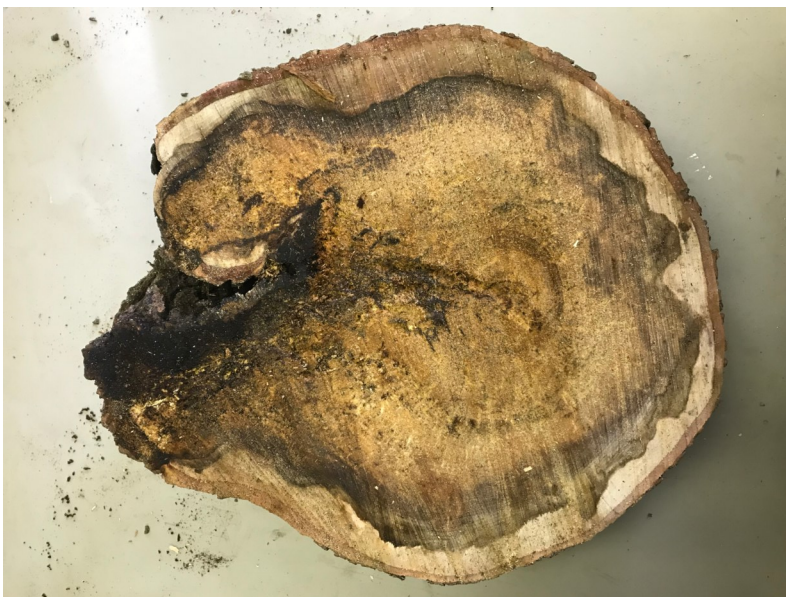
What Age Imbalance Looks Like (cont'n):



This large Soft Maple looks healthy...



...however, from the other side, you can see that it is overgrown and decayed. It now has no timber value.



On the ANF, Soft Maple trees larger than about 22" to 24" in diameter are over-mature. They discolor and rot on the inside, while appearing perfectly healthy on the outside.

As mentioned earlier, trees on the ANF are ready to harvest at about 80 years of age. If this tree could have been harvested at its prime age, its value could have contributed to forest management costs and community funding.

What Age Imbalance Looks Like (cont'n):



Red Rot affects mature Cherry trees. The tree can look healthy from the outside...

...but an inspection of the base of the tree will reveal the inner decay.



Interior of a Cherry tree suffering from Red Rot.

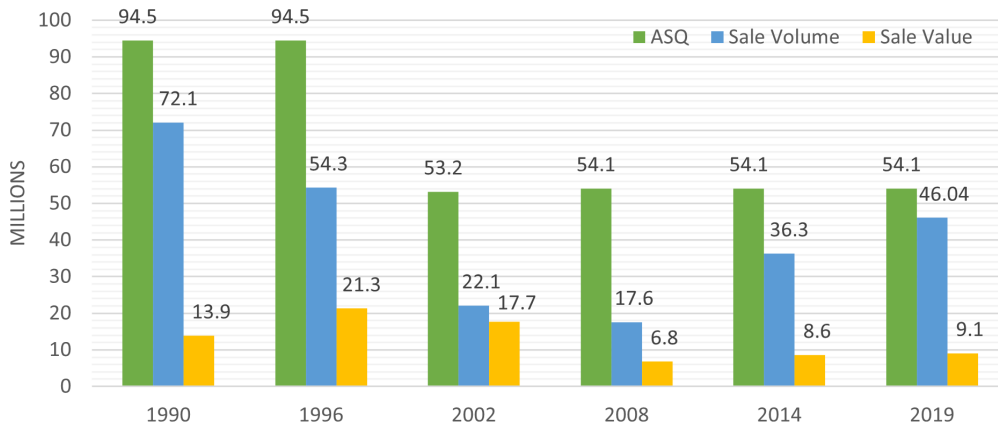


Again, if this tree could have been harvested at the 80-year prime age, its value could have been salvaged before it was destroyed by Red Rot.

Timber harvest on the ANF is not about profiting from our public lands. It is about the forest helping us maintain its health and compensating its host communities for lost property tax revenues.

Age class balance can be achieved ...

Comparing Allowable Sale Quantity, Timber Award Volume, & Timber Values



The **Allowable Sale Quantity (ASQ)** limits the sale of timber to a quantity equal to or less than that which can be removed annually in perpetuity on a sustained-yield basis. **Award Volume** is what is actually sold. **Timber Values** is what the timber sold for.

The 2007 Forest Plan calls for two treatments:

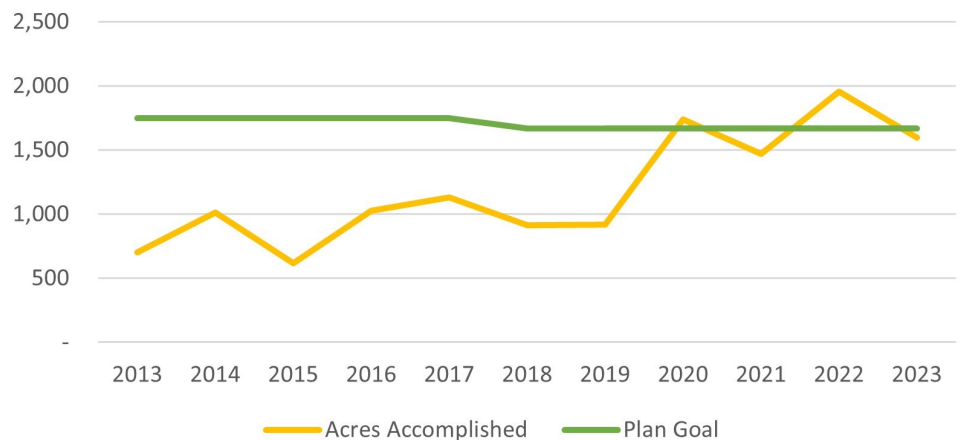
- 1) Even-aged management at about 1,400 to 1,800 acres per year (the actual treated was 3 times less at just 477 acres per year)
- 2) Uneven-aged management at 300 to 700 acres per year (the actual treated was 20 times less than called for at only 18 acres per year)

Young forest is created by completing the final harvest cuts displayed in the graph at right. A consequence of not meeting these goals is that

early successional forest (age 20 years or less) dropped from 8% in 2007 to 3.4% just 5 years later (2012), to even lower at 3.2% in 2015. In recent years, final harvest cuts have met Forest Plan goals.

Visit <https://www.fs.usda.gov/main/alleggheny/landmanagement/planning> to download ANF management documents and reports.

ANF Final Harvests 2013 - 2023 Acres Accomplished vs Plan Goal



Final harvest follows the establishment of adequate seedlings and yields the greatest timber value and volume. In 2020 and 2022, the ANF was able to meet Final Harvest Cuts Sold projected in the 2007 Forest Plan. This trend will need to continue for the ANF to “catch-up” with the Plan’s prescription for early successional forest.

What Does the Future of the ANF Look Like?

If our legislators and the USFS do not give the ANF the resources (staff and funding) it needs, management may be limited and opportunities to naturally regenerate the Forest may be lost.

In approximately 10 yrs—Mature stands that have been substantially impacted by native and non-native insects and diseases will continue to decline.

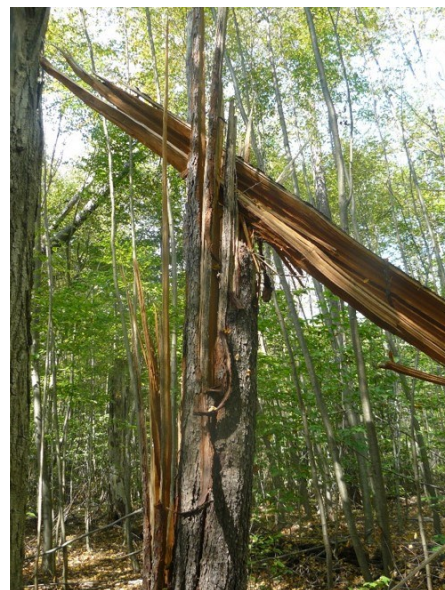
In 20 yrs—Opportunities to naturally regenerate important species, e.g., black cherry, may have been lost. The species composition of those areas will continue to shift away from those species, towards at-risk, shade-tolerant species like American beech.

In 50 yrs—There will be fewer oak trees. The oak forest type is also a product of a disturbance that occurred at the turn of the century. These areas tend to transition away from oak in the absence of disturbance, and this will become more problematic over time.

In 100 yrs—The forest may look similar to other areas that have not been managed or disturbed for the last 120+ years, e.g., Tionesta Scenic Area and Research Natural Area.

The ANF will be a different forest, and its productivity (and community funding) and ability to support the huge plant and wildlife diversity it now boasts, may be lost. It will have:

- A dense canopy shading light from the forest floor and changing the tree and plant species that can grow
- Reduced wildlife diversity, limited to those who depend on late successional habitat
- Regeneration dependent on blowdowns, fires and other natural disasters
- Increased risk of wildfire due to hazardous fuels
- Increased hazards to those who recreate on the ANF
- Reduced timber productivity to help fund forest management and community stability



The ANF was created for the purpose of securing **“favorable conditions of water flow and to furnish a continuous supply of timber”** under the *Organic Administration Act of 1897*.

The *Weeks Act* was passed in 1911 and authorized Congress to purchase private land, often denuded and abandoned, for the express purpose of **managing stream flow**. The ANF was one such acquisition in 1923, purchased to reduce flooding along the Allegheny River. It soon re-generated a new forest on its own, setting the stage for a **“continuous supply of timber.”**

In 1960, the *Multiple Use—Sustained Yield Act* was passed, directing equal attention to five areas of management on national forests, none of which were to be given lesser priority: **timber, range, water, recreation and wildlife**.

See more at: <https://alleghenyforestalliance.org/index.php/learn/legislation/>

What Does the Future Look Like for ANF Host Communities?

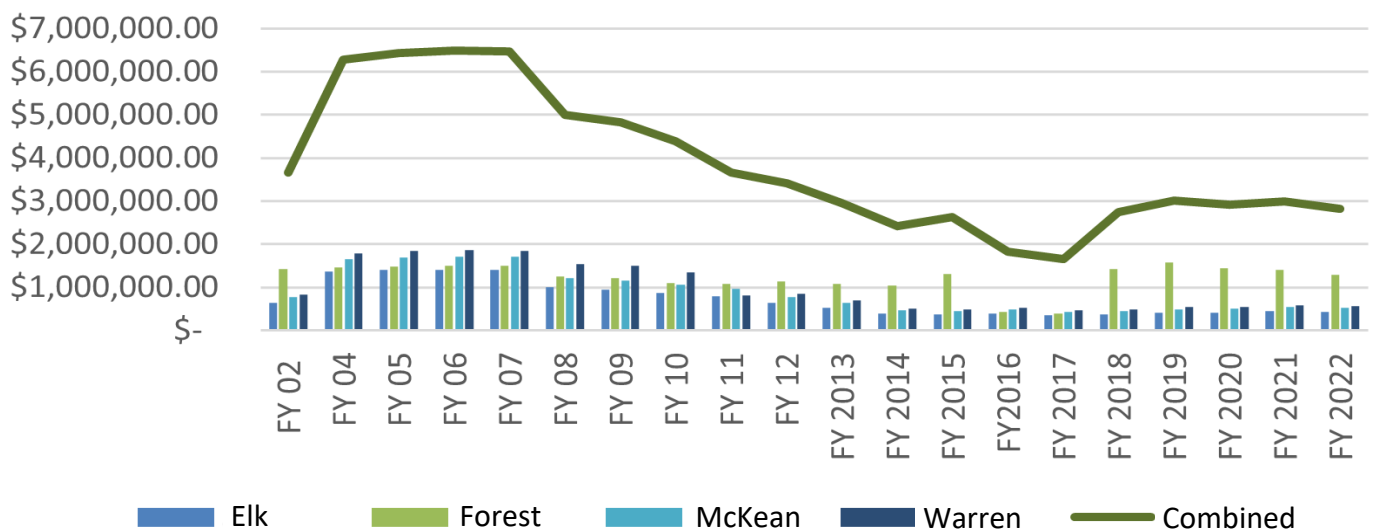
The future of our communities is also at-risk if the ANF is not provided with adequate resources to manage the forest *as directed by USFS policies, which are based on proven science*.

Seven school districts and 34 municipalities in the four counties hosting the ANF receive 25% of timber sale receipts (not including “Stewardship Sales”) under the **Good Neighbor Compact** (Forest Area Schools opted to receive Secure Rural Schools funding) to offset the loss in property tax revenues. These funds, which help cover education and road maintenance costs, have declined over the last 20+ years. This is due to a combination of timber sale volumes, timber market prices, and economic conditions.

The results of this decline, include:

- deferred road projects
- cutting of school programs
- closing businesses and lost jobs throughout the timber, lumber and their supportive industries
- declining local tax revenues due to lost jobs and business income
- declining population as workers leave to find work elsewhere
- local businesses closing due to dwindling population (restaurants, grocery stores, gas stations, etc.)
- increased tax burden upon local landowners

ANF Counties Timber Receipt History Individually and Total 2002-2022

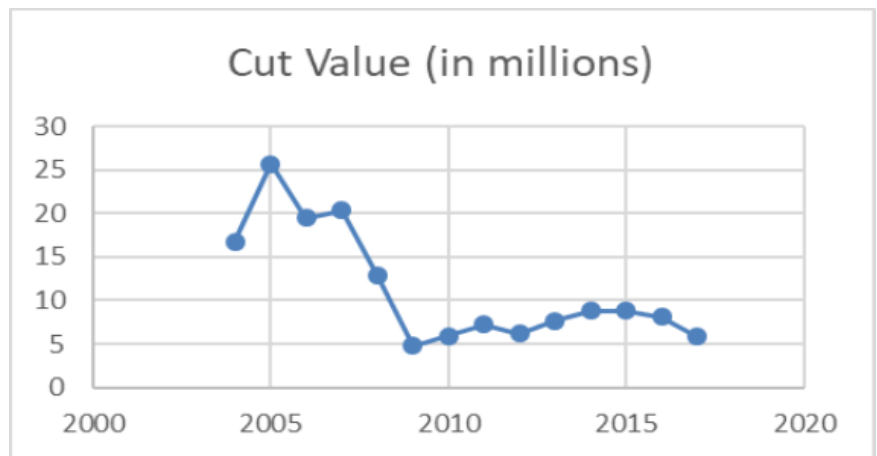


Factors for Decline in 25% Funding:

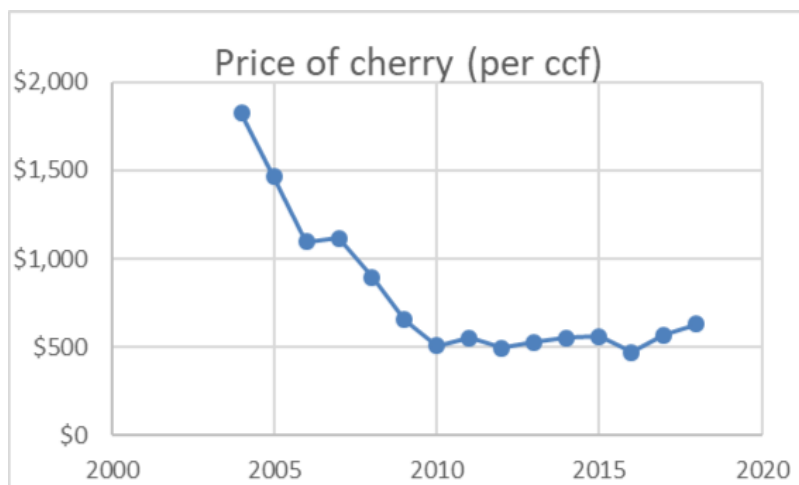
Many things have contributed to the decline in timber harvests on the ANF and, in turn, timber receipt funding:

- Obstructionist lawsuits interfering with sound forest management (timber harvest) were problematic in the 1990s and early 2000s.
- Reduced funding for staff and timber sale preparation on national forests.
- Replacement of wood with other materials for construction and manufacturing (i.e., steel, plastics, and fast growing bamboo and hemp).
- Poor forest product markets, resulting in lower bids for sales of ANF timber
(Pennsylvania Woodlands Timber Market Reports: <http://extension.psu.edu/natural-resources/forests/timber-market-report>)

Value of Timber Harvested 2004-2017



Price of Black Cherry in ANF Timber Sales 2004-2018



Timber Cut and Cut Value 2007, 2015 and 2020

| Year | Timber Cut (in ccf) | Cut Value (in millions) |
|------|---------------------|-------------------------|
| 2007 | 54,369 | \$20.4 |
| 2015 | 66,329 | \$8.8 |
| 2020 | 78,285 | \$7.4 |

Black Cherry makes up 50% of the timber volume harvested on the ANF, and 85% of the value of ANF timber sales.

Source for all timber metrics is the Forest Service's annual "Forest Products Cut and Sold from the National Forests and Grasslands" available here: <https://www.fs.fed.us/forestmanagement/products/cut-sold/index.shtml>

The Challenges ANF Staff Face:

- Funding and staffing less than adequate for the job.
- A complex, and often cumbersome, project planning process that may take 1—2 years to complete.
- Must satisfy State Historic Preservation Office by surveying every acre treated.
- 517,000 acres of forest to manage and treat.
- The scope of their duties is broad: forestry, recreation, habitat, invasives control, endangered species preservation, watershed management, wildfire control, and more.
- A responsibility to monitor the effectiveness of treatments, invasive species, age class balance, etc.
- Frequent staff (particularly leadership) changes and persistent vacancies.
- Unanticipated disturbance events (e.g., wind, ice, and flood damage, native and non-native pest and disease infestations).
- Outside influences (e.g., budget cuts, economy, market prices effecting timber sales, and more).

Recent Progress and Accomplishments:

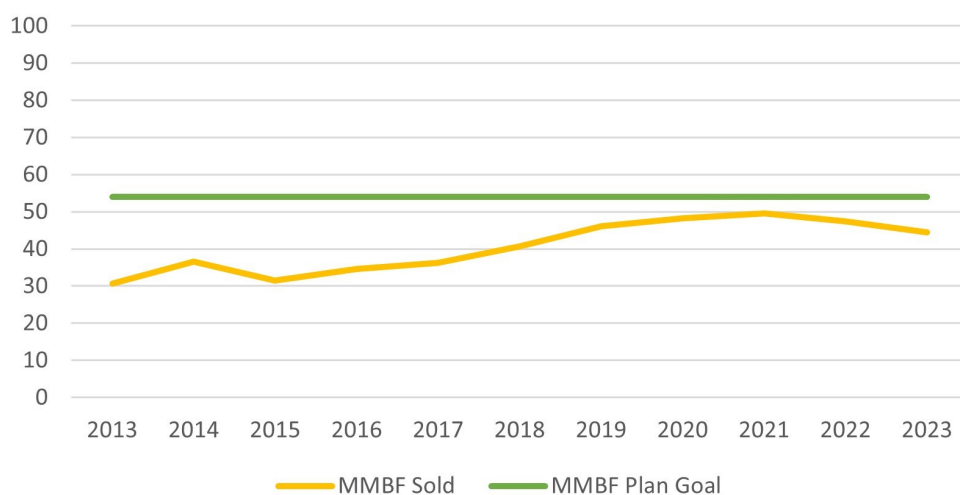
Timber harvests on the ANF have been increasing in recent years, climbing to a high of 50 MMBF in 2021. A reduced, 38 MMBF was offered in 2024 (a result of staff turnover and persistent vacancies), and 40 MMBF is planned for 2025. This is less than the 54.1 MMBF annual Allowable Sale Quantity (ASQ) under the 2007 Forest Plan.

Though sporadic, Shelterwood Seed Cuts Sold (step #1

in even-aged regeneration) have been on the rise since 2015, and are now above the 1,800 acres/yr projected. Site Preparation & Herbicide Application (step #2) has been up since 2014 and is now above the approximately 2,000—2,400 acres/yr projected. These two steps are typically required to establish new tree seedlings before Final Harvest Cuts can take place and will set-the-stage for a continued increase in harvest volume and value...*if ANF staff can maintain this level of treatment.*

The ANF is also working with local agencies and organizations through the Allegheny Forest Health Collaborative (including the Allegheny Forest Alliance) to identify issues affecting forest health and to find and implement solutions.

ANF Timber Volume Goal vs Sold: 2013 - 2023



How Can YOU Help?

→ Comment on projects on the ANF in support of sustainable, multiple-use management.

See the ANF's current SOPA (Schedule of Proposed Actions) Report online at:

<https://www.fs.usda.gov/sopa/forest-level.php?110919>

→ Educate others about sustainable forestry and the importance of multiple use management on our National Forests, and issues that are or may affect our national forests.

→ Participate in iMap Invasives, reporting aquatic and terrestrial invasive species.



Website: <https://www.paimapinvasives.org/>

Download the app: <https://www.imapinvasives.org/mobile-tools>

→ Speak to your legislators at every opportunity, and write to them to comment on legislation relative to national forest management and funding. Stress the importance of adequate funding to manage our national forests, and keeping money and key personnel on the ANF, rather than sending these resources to support fire suppression. *Our forest is facing a disaster too!*

→ Act on AFA advocacy alerts for federal legislation and management policies that threaten our national forests and their host communities.

→ Become an active member of the AFA, and participate in our programs and events.

To join, visit our website at:

<https://alleghenyforestalliance.org/index.php/join-support/membership/>



Resources:

The “2007 Land and Resource Management Plan” and associated documents can be found online at:

<https://www.fs.usda.gov/main/allegheny/landmanagement/planning>

The 2008—2016 Monitoring and Evaluation Report can be found online at:

[2008 - 2016 Monitoring and Evaluation Report Allegheny National Forest](#)

25% Fund payments to ANF counties can be found online at:

<https://www.fs.usda.gov/payments/asr/final2023-10-3-report.html>

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:

1. An area to manage is identified and data on stand conditions are gathered.
2. A silviculturist reviews the data and field conditions to develop a proposal.
3. 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.

Allegheny National Forest

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) :

- [Projects Occurring Nationwide](#)
- [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 \(excluding Projects occurring in more than one District\)](#)

| Projects Occurring Nationwide | | | | | |
|---|--|---|-------------------|-------------------------|---|
| Project Name | Project Purpose | Planning Status | Decision | Expected Implementation | Project Contact |
| Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System EIS | - Land management planning | In Progress: DEIS NOA in Federal Register 06/21/2024 Est. FEIS NOA in Federal Register 12/2024 | Expected: 01/2025 | 01/2025 | Jennifer McRae 202-791-8488 SM.FS.NFSWONGA@usda.gov |
| *UPDATED* | Description: Amend all land management plans for units of the National Forest System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of NFS. Web Link: http://www.fs.usda.gov/project?project=65356 Location: UNIT - All Districts-level Units. STATE - All States. COUNTY - All Counties. LEGAL - Not Applicable. National Forests and Grasslands (128 units). | | | | |
| Locatable Mining Rule - 36 CFR 228, subpart A. EIS | - Regulations, Directives, Orders | On Hold | N/A | N/A | Sarah Shoemaker 907-586-7886 sarahshoemaker@fs.fed.us |
| | Description: The U.S. Department of Agriculture proposes revisions to its regulations at 36 CFR 228, Subpart A governing locatable minerals operations on National Forest System lands. A draft EIS & proposed rule should be available for review/comment in late 2020 Web Link: http://www.fs.usda.gov/project?project=57214 Location: UNIT - All Districts-level Units. STATE - All States. COUNTY - All Counties. LEGAL - Not Applicable. These regulations apply to all NFS lands open to mineral entry under the US mining laws. More information is available at: https://www.fs.usda.gov/science-technology/geology/minerals/locatable-minerals/current-revisions . | | | | |

[Back To Top](#)

Allegheny National Forest, Forestwide (excluding Projects occurring in more than one Forest)

| | | | | | R9 - Eastern Region |
|--|--|--|-------------------|-------------------------|---|
| Project Name | Project Purpose | Planning Status | Decision | Expected Implementation | Project Contact |
| Invasive Plant and Interfering Vegetation Treatment EA | - Wildlife, Fish, Rare plants - Vegetation management (other than forest products) - Watershed management | In Progress: Comment Period Public Notice 08/15/2023 | Expected: 11/2024 | 01/2025 | Glenn Howard 814-728-6186 glenn.howard@usda.gov |
| | Description: Treat invasive plants and interfering vegetation to conserve native plants, wildlife habitat, and desirable vegetation. Includes a Forest Plan amendment. Web Link: http://www.fs.usda.gov/project?project=62459 Location: UNIT - Allegheny National Forest All Units. STATE - Pennsylvania. COUNTY - Elk, Forest, McKean, Warren. LEGAL - Not Applicable. Within the proclamation boundary of the Allegheny National Forest, with a potential to slightly expand to adjacent | | | | |

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.
6. The environmental assessment is completed. Referred to as the environmental assessment comment period, 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.



Sustainable Forestry
Environmental Stewardship
Stable Communities

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