

Walt Atwood

Comments regarding the Allegheny National Forest Recreation Facility Analysis  
5 Year Proposed Plan of Work

Submitted July 28, 2008

Please consider this message be recorded as my personal comments for the  
Recreation Facilities Analysis on the Allegheny National Forest.

I attended the Recreation Facilities Analysis (RFA) event at the Sheffield Lion's Den on 29 January 2008, as well as the RFA "open house" at the Bradford Ranger Station on 28 June 2008. I was there because I am a lifelong recreational user of the Allegheny National Forest (ANF), and I have been riding or driving a snowmobile for as far back as I can remember. I was also in attendance because I am a recreational trails volunteer, possibly for a longer period of time than most of the U.S. Forest Service employees I have met during this RFA process.

The RFA public input process, as I have witnessed it thus far, has treated the public as a nuisance if not an outright adversary. During the 29 January 2008 RFA event held in Sheffield, the Forest Service personnel did not even have the courtesy to go around the room and ask each person to publicly introduce himself (or herself) at the beginning of the meeting as a way of getting everyone acquainted and they did not even circulate a sign-in sheet. The January 29 event seemed chaotic, as if to discourage those in attendance from taking the time to continue participating in the future. The real giveaway during the January 29th event was when the Forest Service had a table with comment sheets printed out, and the comments sheets did not even contain an e-mail address. Did anyone in the Forest Service hand the comment sheets out to the attending public while they were seated, to pass them around and go over the sheet's content? No, the Forest Service personnel left the sheets sitting on a table. People had to go to the table after the meeting to pick a sheet up. Did Forest Service personnel who spoke at the event bring their business cards to hand out, so the public would know who to contact with questions and comments? No, the Forest Service personnel did not offer any business cards. I asked Linda White and she said she didn't have any.

The 28 June 2008 RFA "open house" event was equally as lackluster. I requested that the Forest Service show me where on their web-site RFA documents could be accessed. The Forest Service personnel had to take me to another room and show me on a computer because they did not have a web-address printed out. Worse, one of the documents I discovered on the conference room table (where the RFA "open house" was held) was an "RFA

Rank Tool" spreadsheet (a Microsoft Excel file) that the agency employees could not show me on the web-site. The volunteer organization I support, Tionesta Valley Snowmobile Club, repeatedly requested this spreadsheet. It took until July 15 before the agency personnel would e-mail it to the Club.

One worksheet in the "RFA Rank Tool" spreadsheet is labeled "Available Allocated Funds Process". This worksheet indicates that, on the \$901,986 allocated to the ANF for the "adjusted working budget total", only \$220,144 actually made it to "the ground" for developed recreation. To be fair, there were funds appropriated for categories other than developed recreation that was not part of the calculation: General Forest, Rec Special Uses, Wilderness, Heritage, and Interpretation, all of which are worthy programs. If one applies the same overhead to each of these programs as was applied to developed recreation (about 22% for the Forest Supervisor's Office, and 30% of the remainder for the Ranger Districts) about 54% of the original appropriation actually "makes it to the ground". I find this to be shocking. I also understand that the agency has received an increase in recreation funding of over twenty percent over the last decade. Clearly, this is an agency administrative problem, not a lack-of-funding problem.

I oppose the closure or so-called "decommissioning" of any existing recreation sites on the ANF. The RFA Rank Tool spreadsheet, along with other data, shows that the agency has ample funding to support existing facilities. I am also dismayed that sites which offer the public historic value, such as the CCC-built fixtures at Loleta and Twin Lakes, would be considered for any downgrading of facilities at all. If anything, these facilities should given priority to be preserved and enhanced. Again, the ANF personnel have revealed another bias, this time against the historic value of special sites on the Forest.

I have been visiting the Rimrock Scenic Overlook and Picnic Area repeatedly in recent months. Without a doubt, this is one of the most valuable recreation and tourist sites in my native Warren County. During my visits to Rimrock, I have had the pleasure of meeting hundreds of tourists from Pennsylvania, New York state, North Carolina, and numerous other states. I am dismayed that the Rimrock area would be targeted for proposed oil and gas drilling. If anything, the Pennsylvania Oil and Gas Law, which protects public recreation areas such as parks, should empower the Forest Service to intervene and prevent the Rimrock area from being touched. Also, I am shocked that oil and gas drilling proposals are not being subjected to the National Environmental Policy Act of 1969, and public comment. According to the December, 2007 Revised Environmental Assessment document for the Trans Superior Resources, Inc. project for Private Minerals Exploration in the Matchwood Tower Road Area of the Bergland Ranger District in the Ottawa National Forest, page number 1, "Federal actions such as permitting and/or authorizing access and surface

occupancy for the exercise of private mineral rights must be analyzed to determine potential environmental consequences pursuant to the National Environmental Policy Act of 1969 (NEPA)." I, as a citizen, should have the right to comment directly on the proposed drilling of the Rimrock area through a NEPA process, yet the ANF administration is avoiding such an environmental review and public comment process. I feel my rights as a citizen are being circumvented by agency mismanagement. This clearly proves to me that the ANF administration is biased against recreation.

I have noted deficiencies in the facilities available for the public at Rimrock. On 13 April 2008, shortly after Rimrock re-opened for the year for public use, I noticed a pronounced buildup of leaves on some stairways and in certain areas on the walkways of the Overlook itself. This wasn't just leaves from trees over a short period of time. This was layers of leaves that were inches thick, and the bottom layers were starting to compost and see a buildup of roots. This would suggest that these stairs and walkways have been neglected, having not been cleaned for at least three years. I understand that the "Older Americans" work crew used to take care of these things. Is this correct? When they stopped doing it, who assumed the burden of doing this? How often was it done? I can say these things because on 20 April 2008, "Friends of Rimrock" volunteers, including myself, informally went about raking leaves and trying to clean up some of the mess. I feel we were doing the agency's job, but the agency seems to have "too many chiefs and not enough indians".

It never ceases to amaze me how impractical and poorly maintained ANF recreation facilities are. Restroom facilities always stink like they have been neglected. Parking lots, walkways and stairways are covered with layers of leaves that have begun to compost. Picnic facilities are both poorly maintained and structured illogically. Rimrock picnic area is a classic Forest Service example: there are picnic tables that are dilapidated, and there is no water available. The Forest Service could provide at least a hand-pump well like the one at Tracy Ridge campground.

I attended the Pennsylvania Department of Environmental Protection hearing in June 2007 at the Bradford Ranger Station, regarding the permitting for the ranger station expansion. To this day, I have not been provided with any information about the ANF's Act 537 wastewater management plan. I would think an Act 537 plan would go hand-in-hand with the RFA planning process. It is my understanding that the ANF personnel were supposed to submit their Act 537 plan to the PA DEP in June, yet I have heard nothing about it. Has there been any public announcement about the ANF's Act 537 plan? At this time, I am formally requesting that the agency provide me with the ANF's Act 537 plan. Lack of such information makes it difficult for me to see how the RFA is supposed to work.

I would feel that the deficiencies in the information available to the public during the ANF RFA, including the concerns and unanswered questions raised by the Tionesta Valley Snowmobile Club and the Allegheny Defense Project, have made it clear that the ANF personnel have not properly involved (and informed) the public in recreation facilities planning. I understand the Forest Service Chief Kimball has allowed national forests to extend the RFA comment period until December 31, 2008. I now ask that Forest Supervisor Marten do so for the ANF RFA.