

**Dear Ms. White, Forest Supervisor Marten, District Rangers and other Allegheny National Forest personnel,**

Please consider this message to be Tionesta Valley Snowmobile Club's (TVSC) comments in response to the Open House public event for the Recreation Facilities Analysis (RFA) held on June 28, 2008 At the Bradford Ranger Station (BRS) on the Allegheny National Forest (ANF). Please also be advised our Club is also a signatory to a multi-organization joint comment letter on the RFA through the Allegheny Defense Project. This e-mail message should be taken as an addendum to the Allegheny Defense Project's RFA comment letter.

On Saturday, June 28, 2008, TVSC volunteers, myself included, attended the RFA Open House at the BRS and had a direct dialogue with Bradford District Ranger Anthony V. Scardina. We discussed the RFA, its implications, the RFA whitepapers prepared by both of ANF's district rangers, and the proposed 5-year Program of Work. Our volunteers in attendance were perplexed because we felt that the RFA Open House left us with more questions than answers. Further, our volunteers made sure to ask Ranger Scardina several questions that we feel have not been answered. TVSC volunteers have been active on the ANF since before the Club formed in the 1970's. We, as long-standing volunteers (I have been a Trail Host on the ANF since the program's inception here over 15 years ago) were expecting to gain a much deeper understanding of the status and possible future of recreation on the ANF from this Open House event.

Some of our concerns were as follows:

### **COMPOSTING TOILETS**

One issue raised by Kathe Frank of the ANF Supervisor's Office during the January 29, 2008 RFA public event held at the Sheffield Lion's Den was the notion of maintenance of developed recreation facilities on the ANF in general, and the particulars of wastewater treatment (sewerage) at many of these facilities in particular. Others in attendance expressed concern about this particular topic as well: William Belitskus, president on the Allegheny Defense Project, expressed curiosity as to why many (if not all) ANF recreation facilities were not using composting toilets, and that ANF employee Greg Porter had reported to Belitskus in June, 2007 that the composting toilet facilities at Twin Lakes were working fine and required very little maintenance. Belitskus said Porter told him that the composting toilets needed to be emptied once every five years. TVSC volunteer Walt Atwood also wondered why composting toilets were not being used as a lower-cost alternative to current wastewater treatment systems. Ranger Scardina informed us that there were problems with the Twin Lakes facility, and that according to Robert Wetherell of the ANF Supervisor's Office that were "many sites on the ANF that would not be compatible with composting toilets" without offering any specifics. To date, our Club's volunteers have not heard any report from Ranger Scardina or Mr. Wetherell on the wastewater treatment situation, the possibility of using composting toilets, or what problems or compatibility issues there might be with composting toilets. We fail to see how the use of composting toilets can be summarily ruled out as a low-cost, low-maintenance alternative that should be considered in the RFA. This brings us to our first

unanswered question: Why hasn't the use of composting toilets been considered as part of the RFA?

### **WHY DIDN'T MORSE TELL SANTORUM ABOUT SEWERAGE CRISIS?**

Repeating a passage from our Club's February 15, 2008 letter to ANF employee Linda White regarding the RFA:

During a media event held at the Marienville Ranger Station on Wednesday, July 5, 2006, then-U.S. Senator Rick Santorum, State Senator Mary Jo White, State Representative Kathy Rapp, and all three Forest County Commissioners (at that time) sat around a picnic table with then-Forest Supervisor Kathleen Morse. The event was swirling with reporters and television cameras; we know this because we recorded this strange, foodless picnic when it was telecast on PCN (Pennsylvania Cable Network) later that week. The elected officials listened to Supervisor Morse speak on the LRMP process, the timber harvest, NEPA and trail needs on the ANF. Morse also spoke about the Forest Service budgetary needs. During the foodless picnic conversation, Morse spoke about federal budget allocations and how they affect the timbering agenda for the ANF. Morse also stressed the value of timber harvest. Even though then-Forest County Commissioner Norman Wimer lead Morse's conversation to the importance and needs of recreation on the ANF, Morse never mentioned the sewerage issue, or the ANF's needs to address deteriorating recreation facilities. During the January 29, 2008 meeting, Ms. Frank and other Forest Service personnel present said that the ANF staff cannot directly ask for funds. While this may indeed be true, we were dismayed by the Morse's PCN appearance because it confirmed to us that even when the then-ANF Forest Supervisor has the opportunity to discuss budgetary needs when prompted by a friendly audience of elected officials, Morse would obviously prefer to discuss funding for timber harvest, and ignore the deteriorating recreation facilities entirely.

This leads us to our second unanswered question: Given that the ANF has been in arrears with the Pennsylvania Department of Environmental Protection since as far back as 1994 (and possibly further) over the Forest Service's handling of the wastewater treatment for recreation facilities on the ANF, and given that on July 5, 2006 then-Forest Supervisor Morse was asked by a Forest County Commissioner and a United States Senator about recreation needs during a live-on-tape cable television show for public consumption, why didn't Forest Supervisor Morse report openly about the ongoing wastewater treatment crisis at that interview or at any time since then while she was still ANF supervisor, and why have no other ANF administrators come forward to publicly report on this problem?

### **WHY AREN'T THE RANGER STATIONS MENTIONED IN THE RFA?**

It was understood during the January 29 event in Sheffield that the RFA was to deal with developed recreation sites. However, our Club's volunteers are baffled that neither of the two Ranger Stations on the ANF were mentioned in the RFA whitepapers. Our Club's volunteers would point out that the Forest Service has never bothered to connect any recreational trails to either of the Ranger Stations. For a public forest that is supposedly "multiple use", this makes no sense. Recreational users of a national forest should logically expect to be able to visit any Forest Service public facility for help or relief, and

those users should expect to use those facilities as a visitor's service center. Given that there are no other public facilities on the ANF as highly developed as the Ranger Stations, this would seem imperative to service the recreating public. There should be facilities made available to aid the needs of campers, hikers, bikers, snowmobilers and any other lawful users of the national forest. Yet the RFA seems to put forth the impression that these facilities are somehow exempt, only offering very minimal service to the public. This is especially confusing, since Ranger Scardina said "there's somebody at the front desk to help the public seven days a week". If the ANF Ranger Stations are not directly connected to recreation activity on the ANF, and given that the RFA makes it clear that Forest Service personnel regard these facilities as exempt from the RFA, then the notion of these facilities serving the recreating public seems contradictory at best. At worst, it suggests that the Forest Service does not take the recreating public seriously.

This brings us to our third unanswered question: Why aren't the Ranger Stations covered in the RFA, and what does the Forest Service do to make these facilities useful and accessible to the recreating public?

### **RFA AND THE FOREST SERVICE'S RELATIONSHIP WITH VOLUNTEERS**

In the RFA whitepapers prepared by the ANF District Rangers for the June 28 RFA Open House, there is a repeated recommendation for "increase use volunteers" to maintain certain facilities covered in the RFA. I pointed out that ANF personnel, including those historically in the Bradford and former Sheffield Ranger Districts, have a history of sloppy handling of the agency's relationships with volunteer groups. This includes losing documents containing volunteer agreements with our Club. TVSC volunteers in attendance at the June 28 Open House at the BRS, told Ranger Scardina about this, and asked about how the RFA will affect the relationship the agency maintains with volunteers. Specifically, we asked Ranger Scardina if ANF personnel were prepared to take responsibility for managing volunteerism if the agency plans to rely more heavily on said volunteerism. We asked Ranger Scardina which specific agency personnel are responsible for volunteer management, and what agency policies and procedures are in place to assure the public of responsible management to recruit, retain, recognize and keep a record of Forest Service volunteers (The four R's of volunteer management in any situation. How does the Forest Service keep track of the donation of volunteer man-hours, donated materiel, and donated equipment-hours? Our Club also sent a follow-up message to Ranger Scardina about this issue on June 29, 2008. Ranger Scardina responded on June 30, 2008 in an e-mail saying:

Mr. Atwood,

I appreciate you comments, however, your characterization of our conversation is not accurate and I must clarify. I stated that I was not sure of how the ANF is tracking and managing volunteers. This is something that I have to look into and get back to you on.

Second, I did not state that I was unprepared to deal with volunteers, rather I agreed with you when you stated that it takes time and effort to properly manage and utilize volunteers and that you had good suggestions on how to do so. I also stated that this is something that we have to be

prepared for and manage properly if we utilize more volunteers in the future.

I will look more into this issue and get back to you on how we are managing volunteers and tracking their efforts. Thank you.

Anthony V. Scardina

Allegheny National Forest

District Ranger, Bradford Ranger District

Regardless of the specifics of our conversation or how Ranger Scardina would characterize said conversation, members of our Club have been volunteering on the ANF since before most current ANF personnel were first employed by the agency. Our Club is older than Ranger Scardina himself. The mention of increased reliance on volunteers in the RFA whitepapers concerns us greatly. To date, Ranger Scardina has not provided any information on Forest Service volunteer management. In essence, he stated in his June 30 e-mail message that he would answer our questions, but he never bothered to do so. Since it was the ANF District Rangers who are credited with authoring the RFA whitepapers, and since it is therefore logical to assume the District Rangers are responsible for proposing the increased reliance on volunteers in the first place, it is only logical to assume that ANF personnel should have been ready on June 28, 2008 (if not long before that date) to explain their volunteer management responsibilities, procedures and policies to the public. This information should be made available for anyone wishing to donate their efforts, materiel or equipment-hours to the agency whether there is an RFA or not. Since Ranger Scardina never answered our questions, we can only assume the Forest Service is unprepared to take responsibility for volunteer management. Even worse, we can only assume that agency personnel do not take volunteers seriously.

This brings us to our fourth unanswered question: If the ANF RFA whitepapers are to recommend the increased reliance on volunteerism, what Forest Service policies and procedures are in place to recruit, retain, recognize and record (the four R's) the voluntary donation of man-hours, materiel, and equipment-hours, who in the agency will be designated to take responsibility for the 4 R's, and how will the agency demonstrate its commitment to the public by maintaining this responsibility and reporting to the public?

#### **RFA LACKED PUBLIC OUTREACH**

During the time TVSC volunteers spent at the RFA Open House in the BRS on June 28, Chris Mosebach, a retired former employee of the U.S. Army Corps of Engineers, made several comments to Ranger Scardina about the condition of recreation facilities on the ANF, the handling of the ANF RFA, and what should be done to address problems. Mosebach was sharply critical of the Forest Service when he spoke.

Mr. Mosebach said that U.S. Representative John Peterson has been generous and diligent in securing "earmarked" funds for recreation projects in the ANF region. Mosebach said Peterson's office was always eager to help. Ranger Scardina said he regards the ANF RFA as a "wake up call" to get the public involved and develop a plan to rebuild and revitalize ANF recreation facilities. But Mosebach pointed out that if facilities are slated to be closed and/or "decommissioned" as part of the RFA, it is too late

to organize support for a drive to restore the facilities. Mosebach was obviously speaking from his own knowledge and experience as a federal employee.

This brings us to our fifth unanswered question: If the RFA whitepapers and proposed 5-year Program of Work are not already a foregone conclusion and the public comment period simply a meaningless formality, how can the public have confidence that something can be done to affect the outcome of the ANF RFA?

Mr. Mosebach also stated that on his journey that day to the Open House from his home in Youngsville, Pennsylvania, he stopped at the Kinzua Point Information Center (manned that day by Lori Elmquist). Mosebach reported that the Kinzua Point Information Center had no information announcing the RFA or the Open House. Mosebach further elaborated that the Forest Service has gone to great lengths to publicize the threat of the Emerald Ash Borer pest, urging recreationists not to import firewood from outside the ANF region, and yet there did not appear to be any similar attempt to get the public involved in the ANF RFA. Edward Prince of Allegheny Site Management also stated that he didn't have any prior information to give to the recreating public at the sites he is responsible for. Our Club's volunteers in attendance were dismayed to learn this. On this revelation alone, and based what we witnessed during the January 29 RFA event in Sheffield, we would conclude that the Forest Service does not value or want public involvement in the ANF RFA, and has been generating only minimal publicity to that end. Viewing the following web-page for the Hiawatha National Forest in Michigan:

[http://www.fs.fed.us/r9/forests/hiawatha/projects/forest\\_plan/](http://www.fs.fed.us/r9/forests/hiawatha/projects/forest_plan/)

Should make it clear that when the Forest Service personnel want to publicize one of their planning efforts, the agency personnel are capable of publishing a newsletter and post it on a given national forest's web-site. During the RFA Open House on June 28, TVSC volunteer Walt Atwood asked Ranger Scardina if the agency would publish a newsletter to inform the public and encourage public involvement. Ranger Scardina was sitting right across the table from Walt, and yet the Ranger ignored what Walt said.

This brings us to our sixth unanswered question: If the Forest Service values public involvement in the RFA, why haven't agency personnel attempted outreach through the Kinzua Point Information Center and the publishing of an RFA newsletter for public consumption?

Further evidence that the ANF personnel do not want public involvement in the RFA can be found in the Open House documents themselves. The RFA whitepapers and the proposed Program of Work documents do not contain a name, mailing address or e-mail address to which the public can send comments during the RFA comment period. There is a notation off to the side on the ANF's RFA web-page about Linda White being a contact, but her business mailing address, her agency e-mail address and her phone number are missing. Any citizen who has questions would not know who to turn to without prior knowledge of agency operations.

This brings us to our seventh unanswered question: Why didn't the Forest Service personnel provide documentation at the ANF RFA Open House on who is designated as responsible for handling public comments, complete with direct contact information in the documents and on the ANF web-site?

### **RFA LACKED INFORMATION FOR PUBLIC CONSUMPTION**

During the RFA Open House held on June 28 at the BRS, we noticed some documents sitting on the table which were not available to the public; they were spreadsheets filled with statistics to support the Analysis, bearing the nomenclature "anf\_rfa-rank-tool\_05.14.08.xls", and appeared to be divided into worksheets involving benchmarks, a report on site cost revenue, site ranking, site cost details, and a report on proposed decommission. U.S. Forest Service personnel were not able to show me where the public could download this information on the Allegheny National Forest web-site. We requested this information from Ranger Scardina in electronic format. We followed up that request with an e-mail message to him that same day. Ranger Scardina's reply sent to us at 6:48 p.m. that same day, was as follows:

I will get the information to you soon. Thank you.  
Anthony V. Scardina  
Allegheny National Forest  
District Ranger, Bradford Ranger District

We subsequently learned from Ranger Scardina that Robert Wetherell was responsible for the spreadsheet; upon contacting the ANF Supervisor's Office, we learned that Mr. Wetherell was not available. Even after sending a message to Wetherell once he was supposed to have returned to Warren, we still did not receive any information. Then on July 14, we received the following message from Ranger Scardina:

Ed,  
I have the information available that you and Walt were requesting pertaining to the Recreation Facilities Analysis. I would like to meet you to go over the information and answer any questions you may have. Please let me know when you may be available at your earliest convenience. Thank you.  
Anthony V. Scardina  
Allegheny National Forest  
District Ranger, Bradford Ranger District

...to which I replied:

Dear Ranger Scardina,  
As you can see from our original inquiry message, sent over two weeks ago, (see original message, included below) we requested that the spreadsheet file and reports generated from it be e-mailed to us. We would think it would be wise to receive this information via e-mail first, then if we have questions we could arrange a sit-down meeting as necessary.

How are we going to formulate intelligent questions about information we have not had time to digest it?

We would appreciate it very much if you would send the specific information we requested (see original message below) at your earliest convenience.

Our Club finally received the spreadsheet on July 15.

This was perplexing to us. This spreadsheet was sitting on the BRS conference room table at the RFA Open House, was obviously available for the public to look at, and yet it is not available on the ANF web-site and was very difficult to get from the agency.

This brings us to our eighth unanswered question: How can the public have confidence in the Forest Service's RFA if the agency personnel are not ready to answer questions and provide documentation about the RFA itself?

Given our above experience and unanswered questions, we can only conclude that the ANF RFA is far from ready for closure. We ask that the RFA be subject to NEPA, that the agency renew its commitment to involve the public and that the comment period be extended. In the meantime, we strongly recommend that the notion of composting toilets be used at recreation facilities on the ANF. The notion that composting toilets don't work is doubletalk. It makes no sense. Our Club opposes closure and/or decommissioning on any ANF recreation facilities, based on the finding thus far. We also have serious doubts about the agency's attitude toward volunteerism as part of the RFA. Further, the agency has not made a serious attempt to involve the public in the ANF RFA process. We reject the RFA whitepapers and proposed 5-year Program of Work as inadequate and not in the public interest.

In addition to these comments, we ask that our February 15, 2008 RFA comment letter to Ms. Linda White on the Forest Service be included in with these comments. Given what we have seen, we believe the February 15 letter's sentiments are still relevant to the RFA. We will re-send the February 15 e-mail message from TVSC to Linda White to you shortly.

We also endorse the Allegheny Defense Project's multi-organization joint letter concerning the ANF RFA, which Ryan Talbott will be sending to you.

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