



## Tionesta Valley Snowmobile Club, Inc.

*Speaking for the nature-loving snowmobiler  
on the Allegheny National Forest since 1977.*

**care of Edwin W. Atwood, President**  
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February 15, 2008

Linda M. White, Recreation Facilities Analysis  
United States Department of Agriculture, Allegheny National Forest  
222 Liberty Street Spiridon Building  
Post Office Box 847  
Warren, Pennsylvania 16365

Dear Ms. White,

This letter concerns the Allegheny National Forest (“ANF”) Recreation Niche Meeting, held at the Sheffield Lion’s Den on the evening of Tuesday, January 29, 2008. The public meeting was managed by U.S. Forest Service personnel Kathe Frank, Rob Fallon, Anthony Scardina, and yourself. The meeting  
4 was advertised and open to the public. Upon hearing Ms. Frank speak, we learned that the meeting was intended to gather input on how best to “prioritize” the closure of recreation facilities on the Allegheny National Forest. Earlier publicity hinted at this purpose, but did not explicitly come out and say it.

The Forest Service did not circulate a sign-in sheet for those in attendance. Nor did the agency  
8 encourage people to rise and identify themselves when they spoke.

We were dismayed to learn that the January 29, 2008 event was to be the only public input meeting to be held. No other input meetings are planned. As a volunteer organization some of our members live in distant counties in southern Pennsylvania while other of our membership reside in Ohio. A single  
12 meeting, coupled with a brief comment period of only 17 days is impractical to gather comments from our members. We are aware that some people who attended the January 29, 2008 event traveled for as long as two hours to participate. Some volunteers in our Club are working during the weekdays, and could not manage such a journey on a weeknight. We feel that a single meeting, and that meeting only  
16 held within the ANF and no other meetings held closer to Interstates 80 or 86, will eliminate the possibility of participation for many recreationists and recreational-trail-volunteers. The meeting and comment period seemed too open-and-shut for us. We would ask the Forest Service to reconsider the comment period and to hold more Recreation Niche Meetings closer to either I-80, I-86 or  
20 Pennsylvania’s largest population centers, such as Pittsburgh, Erie, Philadelphia, Harrisburg and State College.

**Tionesta Valley Snowmobile Club**  
**February 15, 2008 letter to Linda White, U.S. Forest Service – page 2 of 5**

Driving this “Recreation Facilities Analysis” is the ongoing maintenance schedule for the numerous public campgrounds, trailheads, picnic areas, and other developed recreation facilities on the Allegheny National Forest. Over the past 40 years, these facilities have become run down, and now the agency is claiming a lack of funds to maintain or rebuild them. Of key importance are the restroom facilities and waterworks. The restrooms for recreation facilities as far away as Heart's Content are supposed to be drained and the waste taken to the Bradford Ranger Station, where the waste is dumped into the sewage treatment lagoon. Citizens recommended replacing the pit-toilets with composting toilet facilities, but this obvious solution would unravel the agency's agenda, so it was not a serious point of discussion.

On the morning of Friday, June 1, 2007, the Pennsylvania Dept. of Environmental Protection held an informational meeting in a garage of the Bradford Ranger Station regarding the proposed (now stalled) expansion of the Ranger Station complex. TVSC volunteers attended the meeting, which was moderated by Mr. John Holden of the D.E.P. Mr. Dan Salm, transportation specialist from the Forest Supervisor's Office, gave a PowerPoint slideshow presentation about the rationale for the project. As part of Salm's presentation, he discussed the sewerage and waterworks there. It seems that numerous ANF recreation facilities rely on the “aerated lagoon wastewater treatment system” at the Bradford Ranger Station. Salm also mentioned that draining of the restrooms at recreation facilities is commonly halted in the wintertime because Forest Service personnel are concerned that the greater volume of fresh sewage would cause the lagoon to freeze. I asked Salm if there was a plan to expand or rebuild the treatment system as part of the expansion of the Ranger Station. He said there was no such plan.

If sewage treatment and waterworks are so cost-prohibitive in maintaining all of these sites, and if one of the key components is the aerated lagoon at the Bradford Ranger Station, a lagoon the agency already said they have no plans to expand or replace, then they could have followed Walt Atwood's recommendation and closed the Bradford Ranger Station in favor of relocating to the former Sheffield Ranger Station. Sheffield Township offers municipal water and sewer. Since the agency personnel refused to entertain this suggestion, and since they already stated they have no plans to address the sewerage inadequacy, it is therefore logical to conclude the agency was planning to liquidate these recreation facilities all along.

Ms. Frank's presentation stressed that ANF recreation facilities are deteriorating due to a lack of funding; when asked about the specifics of the challenges driving the Analysis, Frank immediately stated the agency's inability to support the sewerage at these facilities. But what was so conspicuous about Frank's presentation was the paucity of specific data on the physical plant needs of those recreation facilities. In fact, no data were provided to enumerate the physical plant needs, nor was any offered or posted to the ANF web-site as of February 15, 2008. Subsequent to the January 29, 2008 meeting, our Club's volunteers discovered a letter dated December 21, 2007 from then-Acting Forest Supervisor Lois DeMarco to Kelvin Burch of the Meadville office of Pennsylvania's Department of Environmental Protection (DEP). In DeMarco's letter to Burch, DeMarco said the Forest Service plans not to re-open the sewerage plant at the Kinzua Beach Recreation Area. This information was not made

**Tionesta Valley Snowmobile Club**  
**February 15, 2008 letter to Linda White, U.S. Forest Service – page 3 of 5**

60 available to the public during the January 29, 2008 meeting at the Sheffield Lion's Den. The Forest Service went to the trouble of holding a public meeting and offering a (brief) comment period, but agency personnel did not share this decision on Kinzua Beach with the public. We fail to see how the public was supposed to have an intelligent discussion on this Analysis when such important developments are not disclosed.

64 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.

80 As a result of what our volunteers experienced at the January 29, 2008 meeting we have reached the conclusion that the U.S. Forest Service personnel stationed on the ANF are attempting to confine the scope of this Analysis to produce results based on the preconceived notions of the agency's personnel: a desire to close facilities to avoid further difficulties with DEP over the sewerage issue. During the ANF's Land and Resource Management Plan (LRMP) public input process that concluded in 2006, Forest Service personnel denied citizens the opportunity to discuss recreation issues, stating that there would be a separate recreation analysis on the ANF after the LRMP was completed for 2007. As volunteers who participated in the LRMP process, we rejected the Forest Service's position as absurd; federal law allows citizens to raise any issues of significance during the LRMP process. The revised ANF LRMP fails to analyze the full scope of Oil, Gas and Mineral exploration activities under the National Environmental Policy Act with opportunities for public comment, lacks a discussion of the role of recreation and future planning for recreation facilities on the ANF, and promotes the Forest Service's determined mindset to make All-Terrain Vehicles (ATVs) the premier recreation niche on the ANF.

**Tionesta Valley Snowmobile Club**  
**February 15, 2008 letter to Linda White, U.S. Forest Service – page 4 of 5**

In his coverage of the January 29, 2008 Recreation Niche Meeting, the *Warren Times Observer's* staff writer Dean Wells quoted Ms. Frank (January 30, 2008 article: "Meeting struggles to stay on point," pages A1 & A6):

**29<sup>th</sup> paragraph:**

*"I don't think we'd be here tonight if we weren't committed to recreational opportunities in the forest," she said.*

Ms. Frank was responding to a comment made by the public about a passage in the LRMP. The LRMP passage-in-question, suggests that, as a result of OGM exploration operations on the ANF...

*"...those seeking a more remote and less developed recreation experience could be displaced to other State or National Forests where remote, semi-primitive settings and experiences are more readily available."*

**(LRMP, Final Environmental Impact Statement, page 3-327)**

To further complicate matters, your comments in the February 6, 2008 *Warren Times Observer* were especially troubling to us. Quoting the article "Rec issue input still sought by ANF staff" written by Brian Ferry, pages A1 and A6:

**14<sup>th</sup> and 15<sup>th</sup> paragraphs:**

*"I think it's a good idea to have public meetings, but to have everybody focus on trails again isn't what we need," White said.*

*Instead of another public meeting, the forest service will hold an internal workshop taking advantage of existing input. "What we're going to do is meet internally here in the forest," White said. "We're going to try to nail down what our developed recreation niche is."*

**...and the 18<sup>th</sup> and 19<sup>th</sup> paragraphs:**

*However, comments about trails were not what she was looking for.*

*"It didn't serve the purpose that I need," White said. "My job is to get this done in six months. I need to remain focused."*

The above passages suggest to us that public input was never the purpose of this Analysis; providing a "niche" statement as part of an internal planning process to close recreation facilities and eliminate sewerage concerns with the DEP was the agenda all along.

Please be advised that when the meeting managers were first greeting the public, Walt Atwood, one of our Club's volunteers, began to set up a tripod so that we could record this meeting. Almost immediately, Ranger Fallon approached Mr. Atwood, and told him that he was not permitted to record the evening's proceedings. Further, Mr. Fallon offered no explanation or documentation as to why this was not permitted. Since 1977, Tionesta Valley Snowmobile Club volunteers have been working as an organization for snowmobiling and inter-modal trails on the Allegheny National Forest. Since 1988, our

**Tionesta Valley Snowmobile Club**  
**February 15, 2008 letter to Linda White, U.S. Forest Service – page 5 of 5**

132 Club's volunteers have been participating in planning meetings with the Forest Service. Many of these  
meetings have been videotaped with all participants agreeing to be recorded. It is our understanding that  
this issue was settled a long time ago, and that meetings of a variety of kinds could be recorded.

136 To our knowledge, there was no recording or transcription of the Recreation Niche Meeting. Ms.  
Frank made it clear that this was the only meeting to be held for input into the recreation facilities  
analysis. That being the case, and since there was no apparent sign-in sheet for those in attendance, we  
are mystified as to why this meeting could not be recorded. Our organization requests that you  
140 retroactively rescind the order to ban the recording of the Recreation Niche Meeting, and that you  
further hold another such meeting on a Saturday at a location closer to Interstate 80 or 86 to gather more  
public input so that we can record this meeting.

Sincerely yours,



Edwin W. Atwood, President  
for: Board of Directors

**Attachments:**

- Forest Service “Pre-Work Questions for the Forest Recreation Niche Workshop”
- January 30, 2008 *Warren Times Observer* article “Meeting struggles to stay on point” written by Dean Wells, pages A1 and A6
- February 6, 2008 *Warren Times Observer* article “Rec issue input still sought by ANF staff” written by Brian Ferry, pages A1 and A6