

USDA Forest Service, Region 9

Wayne National Forest

September 2002

Content Analysis:

*A Summary of Public Comments received on the Notice of Intent to revise the
Forest Land and Resource Management Plan
of the Wayne National Forest*

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Introduction

The Wayne National Forest Land and Resource Management Plan (*Forest Plan*) was approved in 1988. There have been 12 amendments to the Plan subsequent to signing. At this time, an additional amendment is underway to address the protection of Threatened and Endangered Species. Since the *Forest Plan* was signed in 1988, the Wayne National Forest has also acquired an additional 54,000 acres. Implementation of the Plan over the last 15 years has resulted in thousands of management activities being planned and accomplished. . During this time, the conditions of the Forest have changed due to management practices and natural events.

The Wayne National Forest is the only National Forest in Ohio. It contains more than 232,000 acres in 12 counties of Southeastern Ohio. The counties include: Athens, Gallia, Hocking, Jackson, Lawrence, Monroe, Morgan, Noble, Perry, Scioto, Vinton and Washington. The Forest has two ranger districts. The Athens Ranger District has offices in Athens and Marietta. The Ironton Ranger District has an office in Pedro, north of Ironton.

The Wayne National Forest forms the core of the hill country of southeastern Ohio, the most heavily forested part of the state. Just 200 years ago, most Americans viewed this region of the Allegheny plateau as part of a vast wilderness. Today many people still view the Wayne as a remnant of the forest primeval. But the impacts of historic industry and agricultural practices have left indelible marks upon the land. Virtually all of the forest that covered Ohio when American settlers arrived was cut to make way for farms and to fuel both. Mining for iron ore, limestone, coal and clay scarred hillsides and polluted many streams. As factories closed and farms failed in the 1930s, the Forest Service began to acquire and restore what were once dubbed “the lands that nobody wanted.”

Acquisition of land for the Wayne National Forest began in 1935. Congress set the Forest Proclamation Boundary in 1951. Administration of the National Forest was provided through the Forest Supervisor’s Office of the Wayne-Hoosier National Forest, located in Bedford, Ind., until 1993. At that time, Congress authorized a separation of the joint forest and creation of a Forest Supervisor Office for the Wayne.

After nearly 70 years, the innate resilience of the hill country forest, enhanced by the work of the Forest Service and countless partners, has created a new forest that many people now value for its opportunities: to experience nature; to enjoy a variety of recreation; to explore the unique heritage of Southeast Ohio, once a major link in the Underground Railroad; and to employ the Forest’s resources for the region’s economic development.

Today, Ohio is dominated by rich farmland, industrial cities, sprawling suburbs and busy highways, and ranks 7th among states in population and 47th in public lands per capita. This scarcity of public lands creates intense competing demands for the Wayne’s limited landbase and resources. The challenge for those who choose to participate in the revision of the *Forest Plan* is to provide information and ideas that will help the Forest Service balance those competing demands in a way that will continue to provide for multiple uses of the Wayne National Forest. Given the significant impact that past agricultural and industrial practices have had upon the land, the *Forest Plan* management direction will continue to place special priority upon the restoration of the forest, the lands, the watersheds and the ecosystem.

The Wayne is managed for multiple uses such as recreation, timber, water quality, air quality, and wildlife. Minerals play an important role in the area, which has a long history of coal mining and oil and gas extraction. Former strip mining areas, some of which are currently being rehabilitated, are located throughout the National Forest.

Located in the foothills of the Appalachian Mountains, the Wayne also provides outstanding recreational opportunities. Leith Run on the Marietta Unit and Vesuvius Recreation Area on the Ironton District are favorite destinations for campers, hikers, horseback riders and fishermen. The 35-mile Little Muskingum River, in Washington County, takes canoeists through pastoral farmland scenes, under several covered bridges and past wooded hills. The Little Muskingum River is one of the few remaining free-flowing streams largely on public land within the state. Its well-preserved condition, and its location in the midst of one of the most heavily populated regions of the country, makes it a valuable opportunity for Midwest recreation enthusiasts.

The Wayne is managed under the Land and Resource Management Plan adopted in 1988. The Plan provides overall direction for the resources of the Wayne for 15 years and included an analysis of the natural resources in the Forest. Public participation was instrumental in the development of the *Forest Plan*. Meetings were held with private landowners, individuals and representatives from organizations and other agencies to help shape future management direction. National forest land management plans are dynamic and leave room for change as new information is learned and projects on the ground are implemented. The 1988 Wayne National Forest has been amended 12 times since it was signed. A new plan amendment is currently under consideration. Those amendments include:

- Amendment 1 (12/90) corrected an error in language related to oil and gas development.
 - Amendment 2 (12/90) eliminated Management Area 9.1 allocation.
 - Amendment 3 (12/90) changed standards for stream crossings by oil and gas pipelines.
 - Amendment 4 (12/90) increased width of vehicles on trails to 50”.
 - Amendment 5 (12/90) clarified use of high-clearance 4WD vehicles on public roads.
 - Amendment 6 (12/90) clarified policy on retaining Little Muskingum River as a free-flowing stream.
 - Amendment 7 (1/92) classified three potential special areas (MA 9.2) as special areas (MA 8.2).
 - Amendment 8 (3/93) changed *Forest Plan* guidance for the management of special uses, minerals and geology to clarify resource protection needs associated with oil and gas development.
 - Amendment 9 (3/93) classified Morgan Sister’s Woods as a special area (M.A. 8.2).
 - Amendment 10 (3/95) reclassified three potential special areas as special areas.
 - Amendment 11 (2/98) added two tables to *Forest Plan*: 1) a table showing actual timber sale acreage for the first decade of the plan, 2) a table showing anticipated harvest for the next 5 years under the plan.
 - Amendment 12 (5/99) designated Buffalo Beats as a Research Natural Area and revised management area designation for the RNA.
- Proposed Amendment to address Threatened and Endangered Species - At the time that the *Forest Plan* was signed, there were no known federally listed Threatened or Endangered Species within the Forest Proclamation Boundary; there are now eight known TES within or adjacent to the forest, including the Indiana Bat and the American burying beetle.

In 1991, the Sierra Club and other environmental groups sued the Forest Service over the implementation of the 1988 Land and Resource Management Plan. The plaintiffs’ complaint was that

the Wayne's *Forest Plan* heavily favored timber production at the expense of other ecosystem management benefits. The U.S. Court of Appeals found in favor of the plaintiffs. However, the Ohio Forestry Association appealed that finding to the U.S. Supreme Court. In 1997, the Supreme Court found that the case was not ripe for judicial review, in essence stating that the plaintiff could not demonstrate injury because a forest plan allows but does not authorize ground-disturbing activities.

The Wayne National Forest began evaluating the need for changing the *Forest Plan* in 1997, when it was anticipated that the Forest was going to be revising its plan beginning in 1998. That initial evaluation began with an assessment of new information and changed conditions that may have led to a change in the existing *Forest Plan*. Information gathered at that time included:

- Results of monitoring and evaluation.
- Review of the major decisions made in the existing *Forest Plan*.
- Review of issues raised in appeals and litigation.
- Comments from the specialists on areas of the *Forest Plan* that required modification.

Prior to public involvement in the Need for Change process, language in the FY1998 Congressional appropriations bill halted all forest plan revision expenditures on the Wayne National Forest.

Since the halt of the 1998 revision effort, additional vital information has continued to be collected that will support *Forest Plan* revision. Those additional documents include:

- Terrestrial Classification Inventory (1999)
- Programmatic Biological Assessment by the Wayne National Forest (2001)
- Biological Opinion by the U.S.D.O.I. Fish and Wildlife Service (2001)
- Pine Creek Watershed Assessment (2001)
- Little Muskingum Watershed Assessment (Scheduled to be completed 2002)
- Acid Mine Drainage Site Inventory (Scheduled to be completed 2002)
- Roads Analysis (Scheduled to be completed in 2002)
- Recreation Feasibility Study (Scheduled to be completed in 2002)

Identifying Revision Topics

1. Identify potential need for change topics.

Congress authorized funding in Fiscal Year 2002 for the Wayne to begin the Plan Revision Process. A Core Team was assigned to being the process of developing a Notice of Intent based on the 1997 input of employees and a public comment period held in January 2002. The comment period included a series of three public meetings held in Nelsonville, Marietta and Ironton.

The 1997 review by Forest employees resulted in a list of over 100 recommendations for change, which broke down into three general classifications. First, many of these recommendations were edits to the wording of standards and guidelines that didn't really change the standard or guideline. Second, there were recommendations that were specific items related to implementation of the standards and guidelines for specific resources. The final grouping was recommendations that were general in nature not tied to specific resource programs.

Comments from the January/February 2002 public comment period were received on most every resource and program on the Forest. Almost all individuals made a comment related to some form of recreation, usually expressing a preference for the Forest to provide for more or less of specific forms of recreation, such as ORV trail riding. Fewer comments were received on a wide variety of other management issues. Topics, other than recreation, that were mentioned most frequently were:

vegetation management (primarily centered around timber harvest); land acquisition; plant and animal species diversity; minerals management; and wilderness. A number of comments were related to the Forest not implementing the direction in the current Forest Plan, or the Forest not providing the quantity of a specific output (for example, not providing the amount of ORV trails, or not harvesting as much timber, as listed in the current Forest Plan).

2. Evaluate the potential need for change topics using established criteria.

In developing the Notice of Intent, the Core Team considered comments from nearly 300 external and internal sources. The objective of this step was to identify those subjects with the significance and relevance necessary to become revision topics. The Core Team discussed the criteria that would be used to identify key factors or conditions for the potential need for change topic to be incorporated into the revision topics discussed in the NOI. The criteria are:

- The Plan Revision process requires that six decisions be addressed:
 - a. Forest-wide multiple-use goals and objectives. Goals describe a desired condition to be achieved sometime in the future. Objectives are concise, time-specific statements of measurable planned results that respond to the goals.
 - b. Forest-wide management requirements (standards and guidelines.) These are limitations on management activities, or advisable courses of action that apply across the entire forest.
 - c. Management area direction applying to future activities in each management area. This is the desired future condition specified for certain portions of the forest, and the accompanying standards and guidelines to help achieve that condition.
 - d. Lands suited and not suited for resource use and production (timber management, grazing, etc.)
 - e. Monitoring and evaluation requirements needed to gauge how well the plan is being implemented.
 - f. Recommendations to Congress, if any (such as Wilderness or Wild and Scenic River designation)
- Need for change topic must be consistent with federal laws and policies and relate to the mission of the Agency.
- Need for change topic must be within the Responsible Official's decision-making authority.
- Need for change topic is not adequately addressed in the current plan.
- Need for change is proposed because there is new information that warrants a reevaluation of one of the six decision made in the plan cited above in first criteria.

Some of the suggestions made concerning need for change in the *Forest Plan* will not be addressed during *Forest Plan* revision. In nearly all cases, the reasons those suggestions are not being addressed is due to the application of the evaluation criteria discussed above. Some of the more common reasons are:

- Suggestion is already addressed in *Forest Plan* or recent decision;
- Suggestion would require a change to law, regulation or rule outside the scope of the *Forest Plan*;
- Sufficient information or rationale is not provided and does not exist to support a change to the *Forest Plan*;
- Outside the mission or authority of the Forest Service;
- Research or data needed to evaluate if a change is needed;
- Suggestion is an implementation item that may be addressed at the project level.

1. Scoping process

The Wayne National Forest published a Notice of Intent to revise its land and resource management plan in the Federal Register on April 4, 2002. There was an initial comment period of 90 days. The comments in this document reflect those received during the 90-day comment period; 626 responses were logged.

In order to best understand and use information provided during this phase of the Forest Plan Revision, a process known as content analysis was used. The purpose of content analysis is to provide information about issues based on public and employee comments to decision-makers. Comments received from individuals during this comment period will be used to assist the planning team in developing alternatives. This analysis is intended to provide an unbiased and impartial summary of comments received, and coding of comments was done by individuals who are not members of the Forest Plan revision team. More technical information detailing the actual process of content analysis can be found in the appendix to this document.

Examples of comments are inserted throughout this document to validate the analyses developed and display a representation of responses. They are not meant to represent the full range of all who commented on a particular topic or issue.

In order for an individual to get an overall picture of how the public has responded to the Notice of Intent, it is important to read this document in its entirety. Many comments crossed over into different categories in this report.

1. A. Overview of Content Analysis Process

Receive and Identify Letters: All letters received were dated, assigned a number, and photocopied. Two copies were made of each letter - one for the purpose of coding and the other retained as a "clean" copy to be used as a reading copy. The original letters will be retained in the planning files.

Develop Coding Structure: A coding structure was developed to facilitate a logical grouping of the comments submitted. These coded categories included of a breakout of comments by the different sections, subjects and categories. Coding categories included the six Revision Topics proposed in the NOI, as well as New Topics, Process, Subjects outside the Revision Process.

Assign Codes to Comments: During a two week period two reader/coders read and coded all the letters submitted. They used the coding structure to code and label each letter in a similar manner. The coded documents were compared to compare results and discrepancies were resolved through discussion between the coders.

Prepare Database: All comments were entered into an electronic database. E-mails were converted to word processing documents. Hand-written submissions were retyped by hand. Printed submissions were scanned. Audio recordings of the 10 public meetings were transcribed by a professional stenographer licensed by the State of Ohio and provided to the WNF electronically.

Develop Digests of Comments: Comments were segregated according to the respective category identified by the reader/coders. The intent of developing digests according to Revision Topics and other areas was to provide public comment directly to the member of the Interdisciplinary Team identified to address that Revision Topic. The purpose of

developing digests was to provide the specialist with only the comments that related to their respective Revision Topic. The specialists were also provided a copy of the Summary to provide the larger sense of public opinion. In cases where comments contained information relevant to several Revision Topics, the comment was recorded into each digest. In cases where commentors provided information about several Revision Topics separately, the relevant information was recorded into each digest.

Developing a Summary: A reporting outline was developed by the Content Analysis Team based on the outline of the Notice of Intent. This summary describes the range of comments received under each Revision Topic in manner as neutral as practical. No additional information was added by the Core Team, and no effort was made to correct or clarify any content of any submission.

Reporting to the Public: Exact duplicates of the Revision Topic Digests and the Content Analysis Summary have been posted to the WNF website. In addition, copies are available on CD Rom. Photocopies of the Digests and Summary can be mailed to interested parties. The original comments are available for inspection at the Forest Supervisor's Office.

1.B. Demographics/General Reporting

1. Introduction:

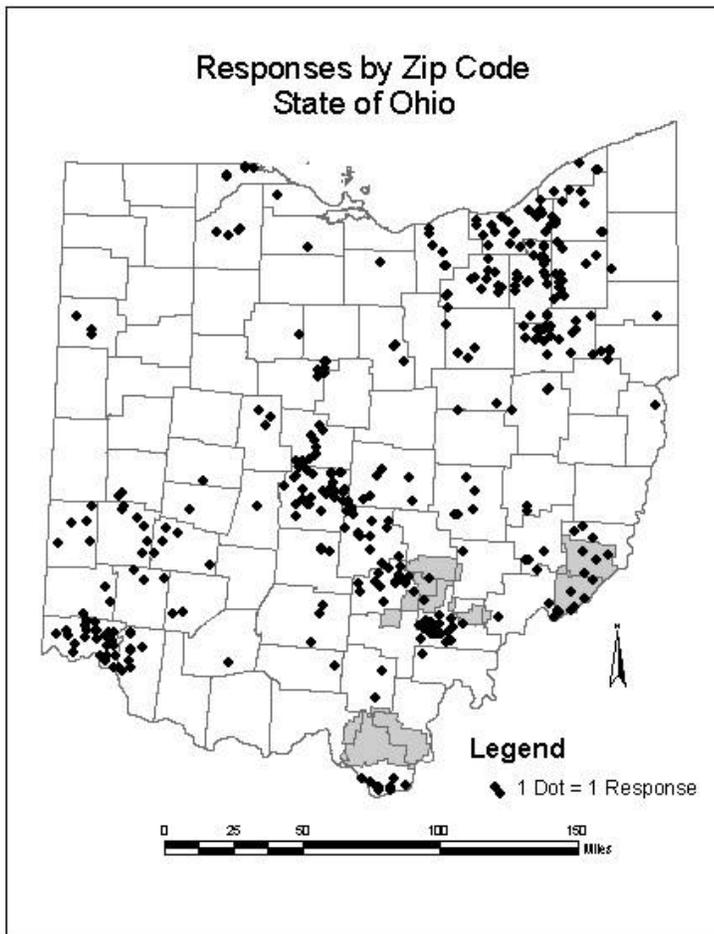
The following information summarizes the number of comments received, who respondents represent, where they reside and other general information about comments. Analysis of comment content is handled in later sections of this document.

It is important to note that content analysis is not a vote counting process. It is a tool for decision makers that displays collected information. In other words, it provides information on public input to the decision makers, so they understand the issues and concerns of the public. Content analysis provides a summary of the extent, content, and nature of public input, "without any attempt to pass judgement on comments received." This approach attempts to process every comment in an objective fashion to ensure equal consideration.

1. We received 626 responses to the Notice of Intent. Of these, 57 numbered responses were duplicated submissions, so we actually analyzed 566 responses. Responses were considered duplicate if they contained identical content and were submitted by the same individual. Form letters which contained the same content but were submitted by different persons were not considered duplicates.
2. Of the 566 responses coded, we received 218 form letters. There were four unique form letters. Responses that modified or added information to the content of the form letter were not considered form letters.
3. In addition, 151 commentors were signatories to one of three petitions received.
4. At the 10 public meetings held in June, we received 237 verbal comments that appear in the transcripts and were coded.

2. Who Responded:

1. The demographic information reported here is based on self-reporting by the respondents. No independent effort was made to verify identity, addresses or state of residence. In some cases, respondents who used e-mail did not provide demographic or geographic information.
2. Geographic location of respondents.
 - a. 21 respondents, or 3.7 percent of the responses coded, identified themselves as from outside Ohio.
 - b. Approximately four percent of the responses came from states other than Ohio: Arizona, Georgia, Indiana, Kentucky, Michigan, Minnesota, Nebraska, Pennsylvania, Puerto Rico, West Virginia.
 - c. Two respondents with return addresses in Australia indicated that they were Ohio residents working overseas.
 - d. 92 respondents, or approximately 16 percent of the responses coded, provided an address with a zip code that corresponds to a county in which the WNF owns land.
 - e. The scattergraph on the map below shows the location of addresses provided by respondents. A cursory glance at the map indicates that responses reflect the population centers of Ohio as well as the locations of the public meetings.



3. Response Type:

a. Manner in which comments were submitted.

Respondents used several methods to submit comments; written letters, comment forms, form letters, electronic mail, telephone, and verbal comments at public meetings.

We held 10 public meetings during the 90-day public comment period after the Notice of Intent was published. All 10 meetings were held in June. Nine meetings were held in Ohio, one was held in Huntington, West Virginia. The Huntington location was selected because it is a large population center on the south side of the Ironton Ranger District. Comments resulting from these meetings were included in the content analysis process. The meeting places are listed below.

PUBLIC MEETINGS

June 3, Wright State University, Dayton, Ohio

June 4, Clarion Hotel, Cincinnati, Ohio

June 5, Radisson Hotel, Huntington, West Virginia

June 10, Embassy Suites Hotel, Dublin, Ohio

June 13, Logan-Hocking Middle School, Logan, Ohio

June 22, Graysville Community Center, Graysville, Ohio

June 24, Holiday Inn, Independence, Ohio

June 25, Four Points Sheraton, Canton, Ohio

June 26, Holiday Inn, Zanesville, Ohio

June 29, University of Rio Grande, Rio Grande, Ohio

b. Explanation of form letters.

We received four unique form letters in response to the NOI. A form letter is one where everything is exactly the same from letter to letter; there may be one or more signatures on each letter. Since content analysis is not a voting process, we coded the unique letters. We did identify support of the positions taken in the letters by entering names and addresses of signators into the database and recognizing geographic concentrations of individuals who are interested in our process and care about decisions made in the Forest Plan Revision process.

Example: The WNF received the comment below from 138 different sources primarily by e-mail and fax. For the purpose of coding, each paragraph was coded according to the respective Revision Topic. The sources of the comment were then identified with the Comment Log Number as indicated below:

The current management plan for the Wayne National Forest will not protect Ohio's only national forest. The new Forest Plan must consider and adopt the following provisions:

1. End commercial logging in the Wayne National Forest Continued timber harvesting in the Wayne is clearly not necessary to support local economies and is not an appropriate management technique for the forest. The forest is home to a number of endangered, threatened, and sensitive species, all of which rely heavily on the existing timber resource and have been especially harmed by even-aged management techniques.

2. Increase wilderness-like natural forest areas At least one large, significant, and contiguous unit of the forest in each of the Wayne National Forest districts must be managed in a wilderness condition and groomed for adoption into the Wilderness Preservation system.

This will help to adequately preserve and restore the biological integrity of the forest, develop habitat for existing and future species, and promote primitive types of recreation.

3. Preserve old growth areas The US Forest Service should identify the old growth resources in the Wayne National Forest and prohibit all harvesting of old growth trees. The entire forest must be managed with the ultimate goal of preserving stands of old growth within each unit and district throughout the national forest.

Please protect the Wayne National Forest so that Ohio's natural heritage may be enjoyed by future generations. [16-79,81-95,98-99,111-118,121-125,141, 143-147,151-156,159-167,181-188,208,213,235-243,248-254,282-283, 292, 312, 317, 335, 358, 384,388-389,394-395, 397, 402-404, 408-409, 415]

c. Explanation of petitions.

We received three petitions. The names of the signatories were entered on the log of commentors. The text of the petition was coded. The petitions received in response to the Notice of Intent were provided by:

Friends of the Wayne National Forest
Rivers to Trails, Inc.
Southwest Ohio Green Party.

d. Official record of the public comments.

The original submission of all comments, including tapes of the verbal comments provided at the public meetings, are on file in the Forest Supervisor's Office, Wayne National Forest, 13700 US 33, Nelsonville, OH 45764.

Electronic versions of all coded comments were made. E-mails were converted to word-processing documents. Transcripts were provided by a legal stenographer in both word-processing documents and as printed transcripts. Some submissions were scanned to create electronic versions. Handwritten documents were typed into the Forest Service computer system. Commentors who provided lengthy documents were asked to submit their comments electronically as well.

The Revision Topic Digests are available on the WNF website, as well as this Summary of Content Analysis. In the publicly available documents, commentors are identified only by the log number assigned to their content. Under the guidance provided by the U.S. Department of Justice, names and addresses of all commentors are subject to disclosure under the Freedom of Information Act.

2.A. Planning Criteria for Developing Revised Forest Plans

A few people commented specifically on the planning criteria section of the Notice Of Intent. Their concerns ranged from a general distrust of the planning process to very specific questions about how the revision process addressed specific subjects, such as the Proposed Amendment 13 to the Land and Resource Management Plan that intended to address threatened and endangered species.

2. A.1. Validity of the Planning Process

One commentor expressed an opinion that the Plan Revision was primarily a “make-work” function for the U.S. Forest Service that accomplished little of value.

Example:

The comment on Page 3, referred to above, referenced the portion of the Wayne NF document, which states, "a forest plan allows but does not authorize ground-disturbing activities." This sentence well illustrates the intentional word play game employed by the Forest Service and those who write the legislation and the rules, which govern this agency. In reading this 15-page document, it is apparent that the entire process from paperwork to implementation is designed as a "make work" scam for the U.S. Forest Service.

I first became familiar with this sort of government waste while investigating the U.S. Army Corps' so-called flood control project on the Mill Creek in Hamilton County, Ohio. First in looking at FEMA data, I learned that this flood control project was not actually needed since the 'flood that was used to justify the project was actually caused by the misdeeds of another federal agency, the Federal Highway Administration, when their sloppy earth moving work caused the land to slide into the creek during a rain; the flood control project was a cover up to shift blame for the federally caused damage. Fortunately in that case, when I was able to prove to the U.S. Congress's Energy and Water Development Appropriations Subcommittee that this project wasn't actually going to be implemented, the funding was stopped, thus saving the U.S. tax payers, about a million and a half dollars a year.

The parallel to the U.S. Forest Service's land management, from the example listed above, is that the federal policy of encouraging the supplying of cheap raw materials to industry and the hasty development of, what is now the mainland portion of the U.S., lead to the devastation of the land as well as the economy of Southeast Ohio, so to cover up this mess, devastated lands were purchased from the bankrupt land owners starting in 1935. This policy of purchasing resource raped lands continues for the Wayne National Forest and federal dollars are then spent in a Super Fund type style in an attempt to remediate the damage caused by those who have profited from this exploitation. The Forest Service's role in this "iron triangle" is to make-work for itself by generating paperwork to both remediate and continue this resource exploitation. The most clever part of this scam is the use of federal appropriations to carry out this paperwork while the Agency pockets the proceeds of continued resource commercial exploitation in its multitude of slush funds for use in maintaining itself. (During the 1995 government shut downs, the IRS sent its employees home without pay, but the U.S. Forest Service continued to sustain itself on its slush funds.)

I'm writing to suggest that it is possible, if the Forest Service employees so choose, to use

their own rules, to instead of continuing to play this game, could instead help create a forest in southeast Ohio which would, help to grant to future generations the right to a livable planet. It is not likely that the U.S. Congress will ever pass clear, definite comprehensive legislation related to the U.S. Forest Service lands since, under the current campaign funding structure, it is in the interest of the individual members of Congress's financial interest to continue to receive lobby funding from as many different special interests as possible. It therefore becomes necessary for the U.S. Forest Service employees most directly responsible for determining the future of the National Forest lands to take forwarding looking, creative and courageous stands to move the management of the lands under their jurisdiction in a direction that will most benefit their children and their children's children and so on. [295]

2. A.2. Applicable Federal Laws

Forest Plans are developed in accordance with the National Forest Management Act and the National Environmental Policy Act; however, National Forests also operate under a host of federal laws, executive orders and agency regulations. A number of commenters reminded the Planning Team of its responsibility to fully comply with applicable laws.

Example:

Request compliance with the following Public Laws, Executive Orders and CEQ memorandums as you prepare the Environmental Impact Statement.

Compliance with Public Law 104-121, March 29, 1996 the "Small Business Regulatory Enforcement Fairness Act of 1996", to include:

EO 12630 Governmental Actions and Interference With Constitutionally Protected Property Rights (March 15, 1988)

EO 12866 Regulatory Planning and Review (September 30, 1993)

EO 12898 Federal Actions To Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations (February 11, 1994) US Department of the Interior EJ Compliance Memorandums of August 11, 1994 and May 30, 1995

EO 12988 Civil Justice Reform (February 7, 1996)

EO 13211 Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use (May 18, 2001) . SEC. 212. COMPLIANCE GUIDES. Small Business Regulatory Enforcement Fairness Act of 1996

(a) Compliance Guide.--For each rule or group of related rules for which an agency is required to prepare a final regulatory flexibility analysis under section 604 of title 5, United States Code, the agency shall publish one or more guides to assist small entities in complying with the rule, and shall designate such publications as "small entity compliance guides". The guides shall explain the actions a small entity is required to take to comply with a rule or group of rules. The agency shall, in its sole discretion, taking into account the subject matter of the rule and the language of relevant statutes, ensure that the guide is written using sufficiently plain language likely to be understood by affected small entities. Agencies may prepare separate guides covering groups or classes of similarly affected small entities, and may cooperate with associations of small entities to develop and distribute such guides.

(b) Comprehensive Source of Information.--Agencies shall cooperate to make

available to small entities through comprehensive sources of information, the small entity compliance guides and all other available information on statutory and regulatory requirements affecting small entities.

Also, the agency should comply with the White House Council on Environmental Quality (CEQ) Guidance Memorandum on Cooperating Agency Status, issued February 5, 2002, which states. White House Council on Environmental Quality (CEQ) Chairman James L. Connaughton has sent a memorandum to the heads of all federal agencies which emphasizes the importance of including state, tribal and local governmental entities in the preparation of federal Environmental Impact Statements (EISs). This guidance document is designed to ensure that state, tribal and local governments are included as "cooperating agencies" whenever appropriate during federal environmental reviews. The guidance is also being sent to tribal and state and local governmental organizations. Chairman Connaughton said, "This memorandum reinforces President Bush's commitment to working with state, tribal and local governments and fostering a collaborative approach when making federal decisions that effect local communities. In situations where these government actors have particular expertise or share jurisdiction over a decision of the federal government, they should be formally welcomed as partners in the environmental review process." The National Environmental Policy Act (NEPA) requires federal agencies to analyze the environmental aspects of their proposed projects, activities, and other actions with potential environmental impacts. NEPA also requires federal agencies responsible for preparing NEPA analyses and documentation do so in cooperation with state and local governments and other agencies with jurisdiction by law or special expertise. CEQ's "cooperating agency" regulations implement that requirement; today's memo clarifies the application of that rule. The CEQ memorandum noted the benefits of enhanced cooperating agency participation, which include disclosing relevant information early in the analytical process; applying available expertise and support; avoiding duplication with other federal, state, tribal and local procedures; and fostering intergovernmental cooperation and trust. In cases where cooperating agency status is not possible, Connaughton urged agencies to consider including federal, state, tribal and local agencies in the interdisciplinary teams engaged in the NEPA process and to provide them adequate opportunities to review and comment on the environmental analyses. [1C]

2. A.3. Proposed New Planning Regulations

The Department of Agriculture published new planning regulations in November of 2000. Concerns regarding the ability to implement these regulations prompted a review with probable revision of these regulations. On May 10, 2001, Secretary Veneman signed an interim final rule allowing forest plan amendments or revisions initiated before May 9, 2002, to proceed either under the new planning rule or under the 1982 planning regulations. The Notice of Intent included a statement that the Wayne National Forest revision process will start under the 1982 planning regulations, pending future direction in revised regulations.

Several commenters disagreed with the WNF decision to proceed under the 1982 rules.

Examples:

The NOI declares the Forest Service's intention to proceed under old, outdated planning regulations, yet provides absolutely no justification for the agency's decision to do so. Secretary Ann Veneman's final interim rule "does not prohibit forests from preparing

amendments or revisions of land and resource management plans under the [revised] November 2000 rule. In fact, there are several forests that have begun revisions to their land and resource management plans under the November 2000 rule." The November 2000 regulations were promulgated by the Department of Agriculture after extensive public review and input. Unlike the regulations that the Forest Service has opted to use for the purposes of this Forest Plan revision, the November 2000 regulations address the need to protect various non-commodity uses of the national forests such as biodiversity, recreation, and other community benefits. Additionally, the November 2000 regulations reflect trends in management strategy that have been developed, studied, and tested by the Forest Service over the past decade. The preservation of species, biodiversity, forest resources, recreational opportunities, and various other non-commodity interests on the Wayne National Forest must be considered in this Forest Plan revision. As a result, it makes practical sense that the regulations used in the revision process should be rules that recognize the need for these types of activities. The Forest Service should reconsider its decision to use old, outdated rules in this revision process, and base future decisions and processes on the November 2000 regulations. [330]

It is obvious that the current 1988 Wayne Land and Resources Management Plan has been the subject of much controversy and litigation. Part of this was undoubtedly due to the revision process that was in place and ultimately the 1982 planning regulations that guided the procedure. It is unclear why the Forest Service has chosen to revise the Plan under the same planning regulations that were so contentious fifteen years ago. We believe the 2000 planning regulations are more in line with the current realities of the National Forest system. The 2000 planning regulations should be implemented in the Wayne Plan revision process. [351]

2. A.4. Scope of the Revision Process

The Notice of Intent stated that the proposed Plan Revision would be limited to those the six decisions required in the Planning Process and those topics that needed to be addressed due to changes in conditions or circumstances related to the Revision Topics, as well as minor changes that needed to correct inaccuracies or mistakes in the original Plan document. A few commentors felt that the Notice of Intent too narrowly defined the scope of the proposed Revision Process by identifying Revision Topics.

Examples:

Your Notice of Intent to revise your forest plan contains the following statement: "The scope of this Revision is limited to changing only those portions of the current Forest Plan that need revision, update, or correction. We propose to narrow the scope of revising the Forest Plan by focusing on topics identified as being most critically in need of change. The six decisions listed above will be revisited only in how they apply to the revision topics that are identified." Yet, the planning regulations provide as follows: "36 CFR 219.10 (g) Revision. A forest plan shall ordinarily be revised on a 10-year cycle or at least every 15 years. It also may be revised whenever the Forest Supervisor determines that conditions or demands in the area covered by the plan have changed significantly or when changes in RP A policies, goals, or objectives would have a significant effect on forest level programs. In the monitoring and evaluation process, the interdisciplinary team may recommend a revision

of the forest plan at any time. Revisions are not effective until considered and approved in accordance with the requirements for the development and approval of a forest plan. The Forest Supervisor shall review the conditions on the land covered by the plan at least every 5 years to determine whether conditions or demands of the public have changed significantly." and "219.1 forest planning will be based on the following principles:

- (1) Establishment of goals and objectives for multiple-use and sustained yield management of renewable resources without impairment of the productivity of the land;
- (2) Consideration of the relative values of all renewable resources, including the relationship of nonrenewable resources, such as minerals, to renewable resources;
- (3) Recognition that the National Forests are ecosystems and their management for goods and services requires an awareness and consideration of the interrelationships among plants, animals, soil, water, air, and other environmental factors within such ecosystems;
- (4) Protection and, where appropriate, improvement of the quality of renewable resources;
- (5) Preservation of important historic, cultural, and natural aspects of our national heritage;
- (6) Protection and preservation of the inherent right of freedom of American Indians to believe, express, and exercise their traditional religions;
- (7) Provision for the safe use and enjoyment of the forest resources by the public;
- (8) Protection, through ecologically compatible means, of all forest and rangeland resources from depredations by forest and rangeland pests;
- (9) Coordination with the land and resource planning efforts of other Federal agencies, State and local governments, and Indian tribes;
- (10) Use of a systematic, interdisciplinary approach to ensure coordination and integration of planning activities for multiple-use management;
- (11) Early and frequent public participation;
- (12) Establishment of quantitative and qualitative standards and guidelines for land and resource planning and management;
- (13) Management of National Forest System lands manner that is sensitive to economic efficiency, and
- (14) Responsiveness to changing conditions of land and other resources and to changing social and economic demands of the American people.

The forest plan shall contain the following:

- (a) A brief summary of the analysis of the management situation, including demand and supply conditions for resource commodities and services, production potentials, and use and development opportunities;
- (b) Forest multiple-use goals and objectives that include a description of the desired future condition of the forest or grassland and an identification of the quantities of goods and services that are expected to be produced or provided during the RP A planning periods;
- (c) Multiple-use prescriptions and associated standards and guidelines for each management area including proposed and probable management practices such as the planned timber sale program; and
- (d) Monitoring and evaluation requirements that will provide a basis for a periodic determination and evaluation of the effects of management practices."

Based upon these planning requirements, which specifically provide that revisions follow exactly the same procedures and requirements as the original forest plans, and must

consider every conceivable aspect of forest planning, we see no room for limiting any scope of the plan. Every conceivable issue that could be involved or play a role in forest planning must be reviewed and subjected to public comment to at least determine if there are changes since the last plan that should be addressed through guidelines, prescriptions, and monitoring. Could you please explain to us how it is that you believe that you can limit the scope of the plan before public scoping is even begun? The Mark Twain has now informed Heartwood that they were wrong to include that statement in their NOI. Will the Wayne make the same acknowledgment? [307]

The Sierra Club strongly supports the Forest Service's decision to revise the Wayne National Forest Management plan, and we continue to hold a firm belief that the existing management plan is inadequate to protect our state's only federal forest resource and must be wholly revised.

As a result, we are concerned that a particular section of the NOI, which describes the Forest Service's proposal to "revise the Forest Plan to: Make minor changes throughout the Forest Plan for new or updated information", may be read in a manner that severely limits the scope of this Forest Plan revision.

Such a limitation, if one was intended, is improper. It is the Sierra Club's belief that the current management plan has a myriad of shortcomings. If the comments received by the forest service suggest the need for major revisions to the existing Forest Plan, such revisions must be made to achieve proper forest management and to achieve ends that are in the best interest of the American people.[330]

The Notice of Intent (NOI) for the Wayne Land and Resources Management Plan (LRMP) states:

The scope of this Revision is limited to changing only those portions of the current Forest Plan that need revision, update, or correction. We propose to narrow the scope of revising the Forest Plan by focusing on topics identified as being most critically in need of change.

The revision of the Wayne Forest Plan will focus on management direction identified as needing change.

The National Forest Management Act (NFMA) and the regulations under NFMA require the Forest Service to "revise" LRMP's. What the Forest Service proposes in the NOI more readily constitutes a plan amending process, where the agency is allowed to pick and choose those parts of the LRMP that are to be amended. A true revision process includes revising the entire LRMP, not just sections the Forest Service deems "needing change". Under NFMA and its regulations the Forest Service is required to revise the Plan, not parts of it. We seriously question the legality of artificially narrowing the scope of this revision process.

Further, the Forest Service developed the revision topics identified in the NOI outside the process dictated by the National Environmental Policy Act (NEPA). The revision topics were supposedly identified through "Need for Change" meetings held January 22, 23 and 24, 2002. We received notice of these meetings on January 16th through a letter dated January 14, 2002. This provided seriously limited notice for anyone who wanted to attend the meetings. Also, written comments were due February 1, 2002, providing only thirteen to seventeen days to prepare. A January 18, 2002 letter from Forest Supervisor Mary O.

Reddan to the Buckeye Forest Council regarding these concerns states:

We have not yet published a Notice of Intent, and this letter (referring to the “Need for Change” announcement) is not intended as scoping for the Notice of Intent. We are currently in the process of drafting the Notice of Intent, which we anticipate publishing this spring. We have identified several subjects or “needs for change” based on our experience managing the forest under the existing plan and from extensive interaction with the public and various agencies since the plan was completed in 1988. There is no language in any law or regulation that requires a National Forest to solicit public comment prior to publication of the Notice of Intent.

While the Forest Service may not have intended for the “Need for Change” meetings to be part of a scoping process, it utilized the meetings as if it were. It is clear that the Forest Service went outside of the NEPA process with the meetings to define what would be included in the NOI. The agency restricted the Plan revision process to revision topics gathered, at least partially, through the “Need for Change” meetings and these meetings did not meet the requirements of the NEPA process. Artificially narrowing the scope of the revision process based on public meetings that did not meet the requirements of NEPA puts into question the legitimacy of the Revision Topics identified in the Proposed Action of the NOI. [351]

2. A.5. Public Involvement

Comments pertinent to public involvement fell under three categories - logistics, obtaining and using public input, and education. Overall, there were many comments which spoke in favor of involving the public in the revision of the Forest Plans. There were comments about when to have meetings, how they should be run, and a request to look at more cost-efficient ways to conduct public involvement. One person was disappointed with the lack of adequate publicity prior to a public meeting in the Zanesville.

While most commentors are in favor of public involvement and input, they caution the forests that public opinion should not replace science when making management decisions. Some also believe there is pre-decisional language in the Notice of Intent which precludes the public from being able to participate in the planning process to the fullest extent. Some respondents showed a level of distrust concerning when, how, or if the forest will use input received from the public.

Examples:

One does not have to do a lot of research in order to believe that the experts in the National Forest Service know and understand what is best for our country's public lands. Public interest and awareness can lead to increased support for the purchase and management of public lands. This is critical in the state that ranks 47th in the amount of public land holdings. In closing, I believe that it is important to remove any emotion from the process of formulating a management policy for the Wayne National Forest. Let facts determine the wise use of this great resource. [595]

Throughout the process of the NOI public meetings we have received several comments of concern from our constituents regarding the public comments process. Concerns have arisen over how public comments are weighted. People were told that local communities,

those who leave immediately adjacent to the Wayne National Forest, would have greater emphasis placed on their comments. This is further supported by a January 18, 2002 letter from Forest Supervisor Mary O. Reddan to the Buckeye Forest Council in response to our disapproval of limiting the “Need for Change” hearings solely to Southeast Ohio. The letter states:

Selection of these three locations for listening sessions reflects the spirit of the proposed planning regulations, currently under review by the U.S. Department of Agriculture, which encourages National Forests to respect the voice of local communities.

First, proposed regulations that are under review, by definition, are not current policy. While the U.S. Department of Agriculture may wish to encourage, and should encourage, the voice of local communities it cannot weigh their opinions more heavily than anyone else’s. The current administration’s call for “Charter Forests” may come close to this policy, but as I am aware to date the Wayne National Forest is not considered a Charter Forest. While local comments are extremely important, they cannot be considered any more important than comments gathered from urban centers or from other states. The vary nature of a National Forest is that it is the property of all citizens of the United States, each of whom has equal voice in the public participation process. Likewise, form comments should not be discounted. It is understood that those who sign on to such letters agree with its contents and those opinions should be considered equally viable. Documents obtained through the Freedom of Information Act (FOIA) and conversations with Wayne staff have revealed that sign-on letters or “form type” comment letters may be viewed as less credible and therefore receive less attention. This could be interpreted as affectively silencing public comment, or at best marginalizing certain methods of public comment. [351]

The meeting was poorly set up and attended ~25 public and 3 groups displayed opinion proposals. There was 2 hours for public to view the groups with displays (which took 10 minutes). The Wayne NF did not present their current plan or suggest any changes that need to be considered etc.. Therefore you had only your knowledge of the forest to base any opinions on. They had no statistics available on recreational uses, public opinion and the like. They NEEDED a 45-minute summary of the present plan, which has been used for the last 15 years to give us some background on possible changes that need to be made or things that we did not like.

They did solicit any public opinions to be sent to: r9_wayne_website@fs.fed.us. They also allowed you to testify for 3 minutes, which many did, but it was not very exciting to listen to. There was no written form in which to offer your opinion so unless you like to hear yourself talk opinions were not expressed at least here.

I am holding my opinion until I can educate myself more on this subject and I feel I have a pretty good background in this area to begin with. [205]

I was very surprised to find that my husband, a friend, and I appeared to be the only local people at the Zanesville meeting. Everyone else there seemed to have oil, gas, timber, agricultural, or off-road-vehicle issues in the Wayne, and seemed to be from the counties in which Wayne lies. I am wondering if all of the meetings were packed with such folk and if their input is going to be considered to be representative of the concerns of the people of

Ohio. I never saw anything in the local media about the meeting and when I asked around, no one else local had seen anything about it either. I knew about it from Sierra Club and shared my concern with friends and family. I really do think that as many campers, hunters and fishermen as we have locally that some of them would have been there had they known about the meeting. There is one more meeting only, at Rio Grande; there is no way I can go to see if our local meeting was the rule rather than the exception. How were the public meetings publicized? Were meetings in other areas attended by a better cross section of the general public? Will the input from these meetings be considered as representative of the concerns of all of the people of Ohio? [327]

The 10-year plan that was proposed back in 1987 or 1988, I think was put into effect about approximately 1990, 1991, that plan lasted approximately a year to a year-and-a-half. I attended meetings then as I'm doing here today. I went to Athens. I went to Logan. I went to different places around, I went to Marietta. If this plan that you're writing today, and we're rewriting here right now, and the people here putting in your time -- people, you add up the time that you people are putting in to going to these meetings, and the time of the whole area, and all of these meetings, and you will be lucky if this plan lasts as long, and as much time as you put in to going to these meetings.

If we're going to propose a plan, let's propose a plan that's going to work. The plan that you had in 1987, or 1988, implemented in 1990 or 1991, that was a plan that was a workable plan. It was torn apart for the forests in this country. Don't let that happen to this plan here. You people here are advocating, and advocating for your jobs, and I understand that. As I resident of this county, and this township, and a taxpayer of this township, and this county, and this state, and this wonderful country -- I'm only limited to three minutes. We're limited to three minutes at this meeting. That's absurd. That's absurd.

This is communism, flat down communism. Three minutes is what we've got to talk? Disregard that clock. Let's do what's in the best interests of the people in this country, serve the people in this country. [523]

2. A.6. Marketplace of Ideas

As a part of the 10 public meetings, the WNF hosted a “marketplace of ideas” prior to each meeting. Non-profit groups with an interest in forest management were invited to present information to the public in a “trade-show” format immediately prior to the meetings in an area adjacent to the meeting room. Only a few groups elected to participate.

One commentor provided recommendations from his group on ways to improve the marketplace of ideas if it is used in future public meetings. One commentor felt that a request for proof of non-profit status was an attempt to discriminate against certain groups and therefore the public would be better off with the National Forest under the management of the National Park Service.

Examples:

We finally managed to get the various members of the Sierra Club together that participated in the comment sessions all over the state and discuss the Marketplace of ideas.

Everyone agrees that it is a good idea and that it worked fairly well. The most consistent problem I heard was that it was too long and too early. In other words the fact that it started

at five did not allow working people that normally don't get off work to participate and did not give those that wanted to participate enough time to grab a bite to eat after work and before coming over. So I think most everyone agreed that 6 to 7 would have been better. Another idea was to have a before and after market place, in other words 6-7 and 9-10. Personally our meeting in Canton had me busy the whole time. I remember coming in at five thinking that things would be slow and I could set up the display and then leisurely walk around, talk to you and the other tabling folks and then go into the hearing. As it turned out though I talked to folks at our table for a solid two hours and didn't get a look around at all.

We also felt that it was not clear from the notices what would happen when. We had folks that wanted to comment show up at five and leave when they found out that they had to wait two hours before the actual comments would even start, never mind the fact that they would have to wait another hour and a half if their name started with "A".

Another suggestion that I heard was for you, the forest service, to attempt to get more organizations to participate in the marketplace. Overall we think that you and everyone else involved did a great job organizing so many meetings, traveling all around the state and making a good effort to gather varied opinions. [626]

As I stated at the beginning of these comments, it was the treatment at, the SW Ohio Green Party at the Cincinnati forum which contrasted to that of the so called, "Friends of the Wayne" "group" that caused me to formally call for the Wayne National Forest to become a National Park at the June 4th forum. As more information came to light, it became obvious that a process had been developed that would allow an individual who had demonstrated over 14 years of support for current Forest Service policies to display his materials while the SWOHGP was given convoluted information which implied that it needed further proof of its non-profit status than the identification number supplied with their application.

It was the sort of bias, or incompetence, just described which caused me to display a poster I had made about half a dozen years ago showing a map of the Wayne and the uses of the Wayne at two different events where the local Green Parties had booths this past month. Both times the poster was only displayed for a few hours and no real attempt was made to draw attention to it. The display was basically passive, yet all of the following signed the sheet of paper connected to the display which stated, "We the undersigned would like to see the Wayne National Forest become a ' National Park." The 5 pages of signatures are enclosed with this comment letter, but certainly more signatures would have been collected, if that had been the goal. Our goal was to make sure that the Forest Service would take seriously, the signers' request and mine to develop a viable alternative that would allow the Wayne National Forest to become a National Park if that became the choice that a fairly educated citizenry were to make. [295]

2. A.7. Threatened and Endangered Species Amendment

The Notice of Intent stated that the issue of Threatened and Endangered Species would not be addressed in the proposed Forest Plan Revision because the TES is currently the subject of a proposed amendment to the 1988 Forest Plan. Several commentators expressed concern that TES was more appropriately a Revision Topic than the subject of an Amendment.

Examples:

The NOI states that the “management guidelines related to threatened and endangered species are not included as a revision topic because the Forest [Service] is currently amending the existing Forest Plan based on formal consultation with the USDI Fish and Wildlife Service.” While the Sierra Club appreciates the extensive work that is being performed in an effort to amend the existing Forest Plan, this is not a substitute for an opportunity to comment on and review what should be an important component of the new, revised Forest Plan.

As the Sierra Club understands, Amendment 13 to the 1988 Forest Plan would adopt the Biological Opinion of the United States Fish and Wildlife Service (hereinafter “USFW”) issued in September of 2001. This opinion would permit logging within 1/4 mile of the lone Indiana bat hibernating cave on the Wayne National Forest. In addition, this opinion would establish a standard of only 5 trees over 60 years old per acre as adequate habitat to protect the Indiana bat.

The Indiana bat is a federally-listed endangered species that is declining throughout its historic range. Ohio is and was prime Indiana bat territory. Based on the information known about this bat's life history, the USFW Biological Opinion would be inadequate to protect this mature forest species. We recommend the Forest Service reject this opinion outright (as we will express in comments directly related to that proceeding) or, at a minimum, establish a written management standard (to be later incorporated into the new Long-term Management Plan) that prohibits logging, other extraction activities (e.g. oil and gas leasing/drilling), motorized vehicle trails, and hunting within at least a 5 mile radius of the Indiana bat's hibernaculum. Such a standard would protect both the Indiana bat and numerous other sensitive and often rare forest interior species and would also strengthen protection of potential wilderness designations, particularly in the Ironton and Athens districts.

Endangered and threatened species are by their nature necessary components of the forthcoming revised Forest Plan, and the draft environmental impact statement (hereinafter “EIS”) must address the concerns and solutions that relate to their protection. The elements of an amendment that is created with respect to the existing plan may not be adequate or appropriate in the context of the revised Forest Plan, and the revised plan cannot be developed without embracing the necessity of protecting the flora and fauna, including threatened and endangered species, that live in the Wayne National Forest.

A mere analysis of the alternatives in the final EIS for their effects on threatened and endangered species is not sufficient. Such postponed analysis necessarily precludes any discussion of the effects of the revised forest plan on endangered and threatened Species in the draft EIS and, as a result, the public's ability to comment on the adequacy of the alternatives in the final EIS will be severely impaired.

While it may not be necessary to physically reproduce all of the information and data relating to threatened and endangered species in the draft and final EISs, the issue must be fully addressed and the effects of the proposed alternatives fully analyzed in both of the documents. This could be done through an analysis in the draft and final EISs that includes clear references to specific data and documents relied on in developing conclusions, provided that the referenced data and documents are made widely available to those who wish to review the analysis. [330]

The NOI further states:

There are three compelling reasons to revise the 1988 Forest Plan: (2) agency goals and objectives, along with other national guidance for strategic plans and programs, have changed more than can effectively be covered by additional forest plan amendments and (3) incorporate new information and address changed conditions.

In this section of the NOI the Forest Service states that additional forest plan amendments can no longer effectively address the changed conditions found in the forest. Yet, the Wayne is still in the process of amending the 1988 Plan. Proposed amendments such as management guidelines related to Threatened and Endangered Species are extremely important and carry significant consequences for those species which the guidelines are supposed to protect. By attempting to amend the 1988 plan while acknowledging that the conditions surrounding the 1988 Plan have changed and can no longer be effectively covered by additional amendments is, at best, contradicting. On the one hand the Forest Service admits that agency goals and objectives have changed significantly enough to warrant a major revision of the Wayne Plan. Yet the agency is actively working under the antiquated 1988 plan to guide its decisions on the Threatened and Endangered Species amendment. Without “incorporate(ing) new information and address(ing) changed conditions”, which will only be completed with the issuing of a revised Plan, the Forest Service is essentially producing an amendment that will not meet the conditions that the agency itself has cited as part of its reasoning for the revision process. For all if these reasons any proposed amendments to the 1988 LRMP, including the Threatened and Endangered Species amendment, as well as any habitat-altering projects should be suspended until the revised Wayne Plan is completed. Further, the Threatened and Endangered Species Amendment should be publicly reviewed during the Plan revision process. [351]

2.B. Revision Topic -- Watershed Health

Watershed Health includes treatments to protect and restore in-stream conditions and the associated riparian areas. Keeping watersheds in good condition and restoring watershed health where necessary is fundamental to the stewardship of the land and natural resources. The *Forest Plan* revision will provide guidance that is consistent with the agency's goal to improve and protect watershed conditions to provide the water quality and quantity necessary to support ecological functions and beneficial water uses.

2.B.1. Proposed New Planning Regulations

Health of watersheds impacted by historic coal practices.

Factors leading to a need for change: The *Forest Plan* includes standards and guidelines for the reclamation of mined areas. Restoration of abandoned mine lands has been ongoing. However, emphasis has shifted from treatment of eroding uplands to the treatment and elimination of acid mine drainage. The section on abandoned underground coalmines needs to reflect this shift in emphasis. There is also a need to improve guidance for stream management, including the use of natural channel design in restoration projects.

Proposed Direction: Protect and restore watershed health, including restoration of abandoned mine lands.

Only a few commentors expressed concern with acid mine drainage as an issue, although none expressed the view that it was a program the Wayne should discontinue.

Examples:

Acid Mine Drainage

The Forest Service should diligently work towards the remediation of acid mine drainage sites. These areas should serve as a strong reminder to the Forest Service of the toll commercial resource extraction can take on the forest. [351].

A few commentors expressed the concern the watersheds of Southeast Ohio were at risk of pollution from many sources other than acid mine drainage, and consequently that the value of acid mine drainage remediation was negated by the existence of other forms of pollution that entered the streams

Examples:

The majority of state-listed species of animals in Ohio live in, on, or near waterways and aquatic habitats. Many of these streams and rivers are polluted from old acid-mine runoff, sedimentation from logging or oil/gas well access roads and activities, and from agricultural or siculture chemical runoff. It is time for the Forest Service to make such cleanups a high priority. Money should be concentrated on a watershed by watershed basis so that dramatic results can be fully documented. Priority should start on the Ironton Unit, then the Athens Unit, and then the Marietta Unit. The Forest Service has already begun to remediate some old acid mines on the Wayne, but much more money is needed. It makes little sense to spend many thousands of dollars cleaning up a stream only to fill it with sediment from ORV trails or access roads for logging. [425]

Further, some stream and river segments in the Wayne National Forest are contained on the Ohio EPA's 303(d) list, a list of impaired waterways required under the federal Clean Water Act. Sources of impairment include siltation, organic enrichment/dissolved oxygen, flow alteration, and habitat alteration. Causes of impairment include surface mining, silviculture, hydromodification, industrial point sources, and municipal point sources. The revised Forest Plan must address the issue of impaired waterways in the forest. [330]

No pesticides, herbicides, fungicides or any chemical manipulation of species should occur on the Wayne National Forest. We are only beginning to understand how these chemicals affect humans and the environment. Studies have already shown the adverse affects pesticides can have on species such as the Indiana Bat. Depending on the individual chemicals and the amounts used, these agents can remain in the soil for decades, adversely affecting a wide range of species. Pesticides and herbicides are a serious potential threat to riparian zones. Aquatic species, especially amphibians, have been found to be highly sensitive to these chemicals. The Forest Service should not only discontinue the use of these chemical agents, but also ban their use within the Wayne National Forest. Specifically, the Forest Service should not allow herbicides to be used in the maintenance of utility right-of-ways. [351]

2.B.2. Riparian Areas

Factors leading to a need for change: The *Forest Plan* includes standards and guidelines for management of riparian areas and reclamation of mined areas. There is a need to update the riparian management guidance to reflect the importance of riparian structure and function in the landscape, as well as clear definitions and delineation methods.

Proposed Direction: Protect riparian areas.

Several commentors felt that riparian management direction should be strengthened through the revision process. Some commentors favored an entire watershed approach to managing for aquatic values, rather than just concentrating management in riparian areas.

Examples:

Wetlands are critical to promoting clean water, preventing flooding, and supporting fisheries and wildlife. All wetlands in the Wayne should be mapped and categorized and maximum protections for wetlands should be established in the plan to prevent the loss of wetland acreage and function.[330]

Additionally, riparian Management Areas should be expanded to include all major tributaries in the national forest. Scenic River candidates, such as the Little Muskingum, the Hocking River, and Symmes Creek should be protected by wide buffer zones that prohibit all extractive activities and a closed forest canopy. [330]

One commentor felt that goal of watershed restoration and protecting riparian areas conflicted with other goals identified in Revision Topics in the Notice of Intent, including Recreation and Ecosystem Management. The suggestion was made that the Forest Plan needed to be completely reworked to more holistically reflect the interconnectedness between management activities.

The goal of restoring watershed health and protecting riparian areas is in direct conflict with resource extraction and the development of high Impact recreation (such as ORV - off road vehicles trails) due to the fact that both of these uses cause soil erosion and i reduce the

ability of the land to neutralize past abuses. These high impact uses cause the watershed health to continue to degrade. Another problem with high impact uses is that they are expensive management techniques which conflict with using the limited Forest Service budget for restoration projects.

Within the existing National Forest legislation, it is possible to transform the management of the national forests away from a tradition of sustaining the bureaucracy of the Forest Service and towards a management that is truly in the best interests of the public by keeping in mind that this too would be in the best interest of the Forest Service as well. Currently the National Forests have been managed to influence the price and supply of raw materials for industry and this system has led to a national system of waste and inefficient use of natural resources that has caused degradation of the rural landscape and the concentration of waste in the urban areas. This sort of linear production is not in the best long-term interest of either the public or the Forest Service and certainly not in the best interest of either the Wayne National Forest or Ohio so the WNF Plan needs to be completely reworked from the outdated, late 1980's plan. The Plan needs to have a restoration goal combined with low impact recreation and the creation of wildlife habitat native (pre-settlement) to the part of the state where the forest is located. [294]

2.C. Ecosystem Restoration --

The Wayne National Forest is comprised of lands heavily impacted by centuries of past human inhabitants. Research indicates that in both pre-historic and historic periods Native American cultures routinely used fire to modify their environment. Researchers speculate that fire was used to accomplish objectives including driving game during hunts, facilitating travel, improving habitat for favored game species, facilitating detection of approaching enemies near their settlements, and clearing croplands. When European settlers arrived in Ohio in the late 18th Century, they found a mature forest canopy over an open, grassy floor, which provided forage for bison, deer and elk.

The settlers cleared large areas of forest to create subsistence farms, using the lumber to build their home and warm their hearths. Later, industries cut down swaths of forests to fuel the furnaces of the Industrial Revolution. Miners removed iron ore, coal, clay, sand, gravel and salt from region, each leaving behind their imprint on the land. The introduction of non-native pathogens also changed ecological conditions, virtually eliminating important tree species such as American chestnut and American elm.

When the U.S. Forest Service began to acquire land in Southeast Ohio during the 1930s, much of the land was no longer suitable for farming because of erosion, and the underground mineral wealth had been largely depleted. The regenerative power of the hill country's ecosystem, coupled with early conservation efforts directed at erosion control and reforestation, has resulted in a vigorous new forest. However, research into the pre-European settlement conditions suggest that the forest covering southeast Ohio today is outside the range of historic variability: younger, with a denser overstory, and with more shade tolerant understory trees than ever occurred before.

By managing for ecological restoration, forest ecosystems will become healthy, resilient, and sustainable in the long term, and will therefore provide a sustainable flow of goods and services that help maintain the social and economic components of the ecosystems. Managing for ecological restoration requires an integrated management approach that considers natural processes such as fire, insect and disease outbreaks, and catastrophic wind events, along with human-induced management activities that mimic those natural events.

2.C.1. *Desired future condition.*

Factors leading to a need for change: Research increasingly indicates that the forests of what is now southeast Ohio were predominantly oak-hickory. Stands dominated by the more shade tolerant-species, such as maples and tulip-poplar, were confined mostly to north slopes and other wetter sites. Recent forest inventory and analysis, based on satellite analysis and ground surveys, shows that the proportions of oak and hickory species the forest is declining throughout southeast Ohio, while more shade tolerant species, particularly red maple, tulip-poplar and cherry, are increasing. One possible cause of this decline is the absence of fire, which research has shown helps foster regeneration of oaks. Based on the analysis of the management situation, the Forest Service must determine a desired forest condition. Definition of the desired mix of vegetation conditions may need to be modified, based on the new information research is providing, changing public demand, changing conditions on the land, and the condition of the newly acquired lands. Future ecosystem restoration efforts will be based upon the best available science to achieve that objective.

Proposed Direction: Restore the mixed oak ecosystem to a sustainable level.

While few people specifically addressed themselves to the mix-oak ecosystem, many people expressed an opinion on the desired future condition. People directed their attention to the range of natural variability, ecological processes, biodiversity, human disturbance, pre-settlement forests, old growth designation, timber management and conservation biology. From this mix the overall importance of outcomes from management of National Forest System lands to individuals and society at large becomes apparent.

Examples

We believe that the emphasis for management of the Wayne should be for preservation of the forest. Generally this hasn't been the case with the Wayne. Like most national forests, the Wayne has been over-cut, overrun with off-road vehicles, sliced by too many roads, and exploited with oil and gas development.

The current revision topics do not address several significant issues that are vitally important to maintaining the ecological integrity of the Wayne National Forest. The ability of threatened and endangered species to continue to exist in and around the Wayne is critical. Management guidelines related to threatened and endangered species should be considered before the public in the revision process and not simply added at the Forest Service's convenience.

The current Wayne management plan has been shown to disproportionately favor extractive industry over habitat protection and recreation. A no-commercial logging alternative should be provided in the Forest Plan revision. In addition, an alternative stopping further leasing of federal oil and gas rights must also be included. Logging, road building, oil and gas facilities, and other disturbances already fragment the forests of Appalachian Ohio and should not be permitted within the Wayne National Forest. These practices alter the composition of forests and degrade habitat for rare and endangered species, such as the Indiana Bat, the American Burying Beetle, and many others. Large forest ecosystems are extremely limited in the eastern US, and those on public lands, such as the Wayne, need to be managed to protect ecosystems. These extractive activities also eliminate the opportunity for high-quality recreation, which is in high demand in Ohio. Studies have also shown that recreation contributes substantially more employment and revenue to local economies than logging.

High-quality recreation is extremely important to Ohioans. Independent research has shown that the current Wayne plan is biased towards motorized recreation over other non-motorized forms. Currently illegal off-road vehicle (ORV) trails encompass much of the Wayne to the detriment of other uses and critical habitat. The Forest Plan revision should emphasize increased ORV trail enforcement and the closure of illegal trails. Additionally, illegal ORV trails should be restored while a major effort is made to prevent continued ORV trespass by ORV users who do not use the official trail system.

The revised Wayne plan should expand management areas reserved to promote old-growth habitat. Expanding 6.2 management areas are a necessity in the Forest Plan revision. Ohio, as well as much of the eastern US, has very few acres of mature old-growth forest remaining. It should be a priority in the Wayne to protect and establish new old-growth areas to provide habitat for species which depend on mature forest ecosystems.

The new Wayne management plan should focus on research and inventories of what biodiversity still remains within the forest. Only with a comprehensive understanding of

what is actually present can the agency make truly informed decisions. In the interim, the agency should protect the forest until such data is accurately collected.

Other provisions in the new plan should include, for example, the purchasing of outstanding mineral rights. This is the only guarantee that the ravages of mining and drilling won't destroy essential components of the forest. Also, the Wayne should continue to expand efforts to purchase private in-holdings and seek additional money to purchase land from willing sellers within the purchase boundary in order to insure contiguous forest habitat.

In addition, road densities should be reduced and unnecessary roads removed. Chemical pesticides of all kinds, including herbicides, insecticides, fungicides, and any other chemical killing agents should be prohibited on the national forest. Besides the documented affect of such chemicals on the endangered Indiana bat, these agents are already present in the environment through bioaccumulation and adding to this already heavy ecological burden will only further the detriment of many species that rely on public lands.

In summary, the theme of the new plan should be to preserve and protect the forest from such degrading activities as logging, oil and gas development, road building, pesticides, and off-road vehicles while natural recreational opportunities should be provided and maintained properly. [101, 104-110, 120, 126-133, 135-140, 142,148, 150, 158, 176-177, 203-204, 260, 339, 343]

I would like to express my interest in the development of the Forest Plan for the Wayne National Forest. My specific interests are addressed in each category:

1. Forest-wide multiple use goals and objectives. I would like to see the retention of hunting, trapping and fishing access according to state wildlife regulations.

2. Forest-wide management requirements.

I would like to see sustained use of the forest resources based on the professional opinions of the foresters and wildlife biologists charged with managing the WNF. 3. Management area direction: Would like to see hunting, fishing and trapping opportunities retained.

4. Lands suited and not suited for resource use and production Recommend use of resources on a sustained yield basis consistent with wildilfe management goals, provided there is review/input from state wildlife biologists.

5. Monitoring and Evaluation. A necessary step in determining resource use and its importance for the sporting public and Ohio's economy.

6. Recommendations to Congress on Wilderness or Wild and Scenic River designation. I do not support either. Continue to manage the Wayne National Forest for the benefit of the public by continuing to allow recreation and sporting activities (trapping, hunting and fishing). [314]

The National Trappers Association is grateful for the opportunity to comment on a proposal to end commercial logging in the Wayne National Forest. We are unequivocally opposed to the proposal to end commercial logging anywhere it currently exists within the forest for the following reasons:

1. Wayne National Forest (WNF) is a healthy forest that has been historically managed as a multiple-use forest which has led to the successful recovery of its primarily hardwood forest character.

2. It is interspersed with many in-holdings and no area could meet the definition of "a

wilderness area”.

3. *We have witnessed the institution of the Sierra Club agenda since 2000 and so far in 2002, which basically amounts to “no management” of public lands, and we do not wish the holocaust of unstoppable wildfires such as experienced in the Western states.*
 4. *WNF encompasses scores of communities that derive great economic value from its history multiple management practices.*
 5. *By adopting the Sierra Club’s protections agenda, many communities in the West and Northwest have been economically devastated and we don’t want that debacle repeated elsewhere.*
 6. *The proposed Sierra Club’s objective of closing roads severely limits and restricts public access to public lands as well access to manage the forest and combat wildfires.*
 7. *In no county or community where restrictions such as being proposed by Sierra Club have been instituted has tourism come close to offsetting the devastating economic loss to the counties and communities.*
 8. *By managing WNF under the multiple-use concept, the successional forest provides abundant wildlife habitat, which contributes significantly to the area’s economy, recreational opportunities, and welfare of all types of wildlife.*
 9. *The multiple-use concept of management is a win-win situation to the forest and the communities it surrounds as well as contributing to the national economy. There is absolutely nothing wrong with individuals, companies or corporations making a profit from public lands. By selling timber from the forest, management practices can be carried out at no or little cost to taxpayers while individuals and businesses are provided the opportunity to make a profit which equates to employment opportunities, taxes paid at all levels of government and important commodities and resources required to keep our nation strong.*
 10. *By using the multiple-use principle for forest management, unique areas of the forest can be protected, which they have been.*
 11. *Taxpayers are penalized many times when protectionist principles are applied to an area. Loss of jobs can be devastating (income taxes eliminated). Businesses reliant on the use of natural resources suffer resulting in tremendous loss of corporate taxes and employee taxes. Taxpayers must pay for any management or enforcement practices to maintain the forest (higher individual and business taxes). Taxpayers must foot the bill for Payments In Lieu of Taxes (additional higher taxes for individuals and businesses).*
 12. *The forests are removed from productivity which contributes to the strength of our nation and all lower levels of government and defeats the original intended purpose of why national forests were created to begin with: The assurance of the continued availability of renewable natural resources critically vital to the foundation of our nation.*
- Each unit of public land should be managed by professionals schooled in the areas of expertise unique to the unit of public land to be managed.*
- All factors must be considered in determining what is best for the overall unit of public land as well as individual subunits within the management unit. This is what multiple-use management is and its use has led to miraculous recovery of devastated forests decimated before modern forestry practices were instituted. “Custom tailored” management practices cannot be incorporated in wilderness designated areas.*
- We cannot gamble with our precious national forests. We must be able to react quickly to real threats to the health of our nation’s forests from invasive species, diseases, devastating wildfires and other threats.*

We must learn from demonstrated history, which is presently being all too well played out in Arizona, Colorado, California and other Western states, that public forests must be actively managed for their own protection as well as for the public's protection and welfare. The National Trappers Association strongly recommends NO CHANGE to the multiple-use practices used for the management of Wayne National Forest [367]

Failure to manage the Wayne National Forest through commercial timber harvests is absolutely devastating for wildlife populations. Populations of forest birds such as Neotropical songbirds, grouse, and woodcock need early successional forest (young brushy woods). These species need habitat creation through timber harvests to combat drastic decreases in amounts of suitable habitat and dramatically declining populations. Data from the North American Breeding Bird Survey and the US Fish and Wildlife Service document declining populations of Indigo Buntings, Yellow-breasted Chats, Golden-winger warblers, and other songbirds because of decreasing amounts of young, brushy woods where these species breed and spend part of their lives. In general, species of birds that need young brushy woods are doing much more poorly than mature forest species. The Sierra Club's inflexible, dogmatic opposition to controlled limited timber harvesting furthers the decline in these species. Through lawsuits and aggressive lobbying campaigns the Sierra Club has virtually stopped timber harvesting on public lands in Ohio and in much of the Midwest. In the public mind, the Sierra Club's adamant opposition to cutting any trees at all is often contrasted with a rapacious timber industry bent on deforesting our dwindling outdoor heritage. But there is another perspective going unheard in the heat and smoke of "Tree Hugger" activists chaining themselves to trees, environmental groups filing legal actions to stop timbering on public land, and paper companies fighting back in court: the wildlife conservation groups such as the Ruffed Grouse Society, Wild Turkey Federation, Quail Unlimited. The members of these groups are using the outdoors and raising large amounts of money to support wildlife conservation. What is their message and how does it affect forest management? These groups point out that either positively or negatively, human activity impacts wildlife in the United States. Populations of wildlife change as a result. Deer thrive almost everywhere in America, in many places at levels that threaten ecological diversity and create highway havoc.. But the numbers of songbirds decline. How we conduct our lives, where we build out homes, how we manage our natural resources benefits some species and curtails others. In the lexicon of wildlife advocates: good habitat produces good populations of wildlife. Unfortunately, malls, suburbs, and modern agricultural techniques have a mostly negative effect on wildlife numbers and active management or intervention is necessary. Policies against forest fires or timbering and loss of forests to agricultural use or sub urbanization reduce the habitat for Neotropical songbirds (Golden-winged Warbler, Prairie Warbler and Cerulean Warbler, etc), ruffed grouse, and the American woodcock. Our public forests, especially in Ohio and the Midwest are becoming islands of mono-diversity. All the trees are approximately the same age and support a limited number of wildlife species. Healthy forests need blocks of old growth trees, middle age growth, young trees, and open savannas. Controlled burning, clear-cutting, and tree thinning is necessary to increase healthy forest habitat and to address the reduction in numbers of these threatened species. It is naive to expect that prohibiting cutting any trees on public land will result in the restoration of healthy habitats for wildlife. The pace of urban sprawl and modern life means that the small amounts of public land become islands in seas of cropland and suburbs. Two

hundred or more years ago, forest fire and severe weather created diversity. Today we have to manage our forests to create that diversity. The successful reintroduction of the Bald Eagle and Wild Turkey are splendid examples of successful wildlife management. This wildlife management ethic does not mean that wildlife conservationists are any less committed to our environment. We demand clean water and air. We spend considerable time outdoors hunting/fishing/bird watching and management of our public lands must result in clean air, streams and rivers. Failure to actively manage for wildlife results in decreases in many kinds of wildlife. Unfortunately Ohio ranks very low compared to other states in the amount of public land and public agencies in Ohio are not doing enough to manage for wildlife diversity. Consequently the populations of wildlife such as grassland and Neotropical birds have been declining. The effect of man upon our environment is much too pervasive and powerful to entrust the future of our wild birds, animals, and plants to luck. It is time for public agencies in Ohio to commit to active management of public land in Ohio. The cause of forest birds demands that the Wayne National Forests and other public lands management agencies start creating young, brushy habitat. [227]

I believe that the land and resource management plan for the Wayne National Forest represents a substantial opportunity to address the needs and the viability of bird populations within Ohio, and request that the Forest Service, as they conduct this plan and gathered data, look at the needs and priority of the species in the State of Ohio, from a statewide and eco-regional perspective.

And what particularly I'm an applicant for, is interior species in dense second-growth species, as this is where the Wayne National Forest, with it's unique character might be able to make a most important contribution to these particular species, such as Cerulean Warblers, Black and White Warblers, Humming Birds, Scarlet and Summer Tanagers, and others.

In looking at various management prescriptions, I ask you to pay particular attention to the fact that an increased edge effect could have both, in terms of creating greater opportunities for parasitism, and perdition on bird nests, and young birds, as well as looking at the effect that additional edge will have on creating new habitat that may be available elsewhere in the state.

So, again, if the plan managers could look at the Wayne from a broader landscape level, and how your management prescriptions can address the needs of priority species, it could be a great benefit to bird populations within the state.

I also encourage the Forest Service to look at expanding nature based eco-tourism opportunities.

We've heard a number of speakers regarding trails, and I would also like to include the notion of wildlife viewing trails, a series of sites where the public could view wildlife, whether it's birds, or other kinds of wildlife. We know this is a rapidly expanding area of interest for the public, and those opportunities are not all that prevalent in the state, and this is a great opportunity to do so. [478]

2.C.2. Vegetation management.

Factors leading to a need for change: Vegetation management is a tool that enables the Forest Service to create a range of habitat to ensure wildlife diversity. There is a need to discuss the role of the Wayne National Forest in the management of old growth forest habitat, the provision of early-

successional habitat, establishment and management of corridors that link habitat together to protect plant and animal diversity, and the restoration of riparian and wetland habitat.

Proposed Direction : Use vegetative management techniques to move toward the desired future condition.

On no other subject was public comment so clearly divided into two opposing viewpoints. Some commentors stated that there should be no timber harvesting on the National Forest. Their concerns relate to how timber harvesting impacts water systems, biodiversity, the beauty of undisturbed forests and large trees, and people who use the land for recreation. There is also a belief there is little forest left in Ohio, and what is left on the Wayne should be protected. There is concern that sales of National Forest timber adversely impact the value of timber from private land.

Other people support timber harvesting because they believe this tool contributes to the local economy, and can help maintain and promote ecosystem health, biodiversity and restoration. Some people wish to see the amount of logging reduced, use of alternative harvesting methods rather than clear cutting, and the restriction of below-cost timber sales.

Examples:

No timber cutting of any kind. Using timber from land that was designated, as forest is quite obviously self-defeating. [381]

I am opposed to any logging in the Wayne. I feel that the new forest plan should preserve old growth area, increase land acquisition and increase wilderness forest areas. What ever happened to the park motto, "take nothing with you and leave nothing behind." Why compromise our principles and allow our national treasures to be sold like cheap whores? [308]

I am very much concerned about logging and predatory groups that would carpet bag our public resources. There is absolutely no need to log out any part of the Wayne Nat'l Forest. I believe that Wayne should be protected from logging. We have precious little forest left in Ohio & I don't wish to see Ohio bulldozed into a parking lot. [370]

End commercial logging in the Wayne National Forest Continued timber harvesting in the Wayne is clearly not necessary to support local economies and is not an appropriate management technique for the forest. The forest is home to a number of endangered, threatened, and sensitive species, all of which rely heavily on the existing timber resource and have been especially harmed by even-aged management techniques. [16-79,81-95,98-99,111-118,121-125,141, 143-147,151-156,159-167,181-188,208,213,235-243,248-254,282-283, 292, 312, 317, 335, 358, 384,388-389,394-395, 397, 402-404, 408-409, 415]

For most, the Wayne National Forest is a spiritual sanctuary, aesthetic paradise, and public playground on which to hike, hunt, paddle, picnic, fish, and camp. A survey performed in 1997 by Wright State University, confirmed that over 73% of Ohioans believe that logging should be prohibited on the Wayne National Forest. This public demand should carry considerable weight, as its validity rises far above the small number of private interests that are lobbying this agency to re-open Ohio's only national forest to commercial timber

harvest. *1. Economic Benefits of Prohibiting Commercial Logging* As numerous studies by the Forest Service and other organizations have pointed out, and the effects of other federal land reserves such as National Parks around the country exemplify, prohibiting timber harvest on the Wayne National forest will ultimately promote tourism and strengthen the economy of towns that surround our national forest.

In fact, the Forest Service performed an analysis in 2000 that specifically analyzed the economic effects of non-commodity interests in the Wayne National Forest.

The Forest Service cited a study that was commissioned by the Forest Service and performed by Dr. Warren Kriesel of the University of Georgia, which concluded that (1) over half of the visitors to the Wayne National Forest were non-local visitors who brought “new” dollars into the southeast Ohio region, (2) that expenditures by forest visitors averaged \$82.84 per visitor and contributed almost \$32 million to the region in the year that this study was performed, (3) when economic ripple effects were accounted for visitors to the Wayne National Forest boosted the region’s economy by almost \$46 million in the year the study was performed, and (4) that recreational related spending supported 1,024 jobs and generated almost \$25 million in annual income to residents of the region.

As the population in Southern Ohio and adjoining areas continues to rise, and as more recreational opportunities are made available in areas that have increasing aesthetic beauty and biological integrity, there is no reason not to believe that the economic figures cited in the aforementioned reports will continue to rise and that local communities will receive significant benefit from the non-commodity resources available from the Wayne National Forest.

Additionally, it must be noted that forest products account for under 1% of Ohio’s gross state product and that 95% of the state’s wood and paper products comes from private lands—not the Wayne National Forest. Further, less than 4% of the nation’s timber supply is derived from the National Forest System. Because forest products are a negligible component of this state’s economic base and because commercial logging in the Wayne National Forest has been essentially halted for a period of approximately eight years, commercial logging in the Wayne National Forest is not necessary to support local economies. No Ohio community is currently economically dependent on national forest logging. Our communities do, however, depend on revenues from tourists and other forest visitors. The Forest Service must base its final management decisions on the facts that are available to the agency. The agency must take care not to be unduly influenced by local and regional officials who may have more regular contact with Forest Service officials over other citizens and organizations that hold an equally vested interest in the proper management of the Wayne National Forest. A rational consideration of the facts available can lead to no other conclusion except that ending commercial logging on the Wayne National Forest is in the best interest of local and regional economies and to promote the use and enjoyment of the Wayne National Forest.

2. Ecological Necessity of Ending Commercial Logging on the Wayne National Forest Commercial logging has taken a harsh toll on the health of Ohio’s only federal forest and has significantly compromised the integrity of this land reserve. A healthy forest ecosystem provides numerous environmental as well as health and safety benefits to local and regional communities. For example, healthy forests purify drinking water and protect adjacent areas from floods. Commercial logging and clearcutting, however, compromise these important values. These extractive uses drain nutrients from the soil, wash topsoil into streams, pollute

drinking water, destroy wildlife habitat, and potentially intensify the severity of forest fires. The Wayne National Forest must be managed to protect our region's rivers, streams, and drinking water sources, as well as wildlife habitat and recreational options. In fact, the Wayne National Forest in Ohio has particular and unusual circumstances that warrant an end to commercial logging – more so than many other forests around the country. For example The Wayne National Forest is home to a number of endangered, threatened, and sensitive species, all of which rely heavily on existing forest habitat and have been especially harmed by even aged management techniques. The seven federal-listed species under the Endangered Species Act together with the literally hundreds of state-listed species on the Wayne must tip the balance of public interest towards conservation of this valuable forest habitat over consumption of its limited resources.

No less than 150 species of trees are native to Ohio, with a total of over 300 native woody species of plants.

Ohio's forests average at least three times the biodiversity of a typical western forest making Ohio's forest biodiversity among the highest in temperate regions around the world. Yet, only 35 of woody species in Ohio forests are considered commercially desirable, thus leaving an unusual amount of waste when an Ohio forest is clear-cut.

Ohio is ranked 47th out of 50 states in the amount of land in public ownership, but is ranked 3rd in the nation in the rate at which open land is being developed. Ohio's wildlife has a critical need for the kind of large contiguous forest tracts that only the Wayne National Forest can provide. The average private woodlot owner in Ohio has only 22 acres, so this need cannot be met in the private sector. Thus, Ohio's high biodiversity, when contrasted sharply with its scarcity of land for wild species, means that the best use of the Wayne is for recreation and wildlife.

A ban on commercial timber harvest activities is necessary to adequately protect and restore the integrity of the forest, protect its inhabitants, and sustain a healthy forest ecosystem. [330]

Substantially reduce commercial timber harvesting in the Wayne National Forest Continued timber harvesting in the Wayne is clearly not necessary to support local economies and is not an appropriate management technique for the forest. The forest is home to a number of endangered, threatened, and sensitive species, all of which rely heavily on the existing timber resource and have been especially harmed by even-aged management techniques. [1-7,9,11-15,]

We need to resume controlled-planned timber harvesting in the Wayne. This timber harvesting should be done in a way to protect unique or endangered animals and habitats; ie den sites for rattlesnakes, riparian zones, etc, but also provide maximum economic benefit and plant successional diversity.

The Wayne is not and should not be a Wilderness area. It was established as a timber resource, for recreation, erosion control and to improve the economy in Appalachia.

Resuming controlled timber harvest will:

1) Protect the cultural heritage (Timber Harvesting) of the people who have for generations made their living off the land.

2) Return vegetation-successional diversity that is so vital to wildlife, especially neo tropical warblers, grouse, and many small mammals, amphibians, birds and reptiles. This

species diversity is vital to a healthy eco system.

3) Vegetation diversity = Wildlife Diversity. This will benefit State endangered species like Bobcat, Black Bear, Timber Rattlesnake, wood rat and others.

3) Return the forest to one of its original missions, that of Timber mgt. [134]

I'm a wildlife biologist, and I'm a member of the American Ornithologist's Union, and the Wildlife Society. I wanted to address the need to incorporate timber harvesting, primarily clear-cutting, in the plan revision from a wildlife perspective.

Ohio's forests are maturing. Ohio's about 30% forested, and we have about 7.46 million acres of forestland in the state, that is, as of 1991. But forest statistics reports, produced by the Forest Service, have shown that between 1968 and 1991 acreage in the seedling sapling stage, that is brushy habitat, these are forests less than 20-year's-old, declined by over 50%, from 3.7 to 1.8 million acres.

In that same time period, acreage in saw timber size stands, these are dominated by trees over 11 inches in diameter, more than doubled, from 1.9 to 4,000,000 acres.

During -- since 1966, a survey across North America has been conducted, called the Breeding Bird Survey. Data from that survey showed that birds that need those young seedling sapling stage stands are declining significantly.

Some of those species include, the Golden Wing Warbler, the Prairie Warbler, Field Sparrow, American Gold Finch, Yellow-breasted Chat, Brown Thrasher, Indigo Bunting, and Common Yellow Throat.

The point I want to make here is, that as forests mature, grow over 20-year's-old, these species loose habitat, they lose a place where they can survive and reproduce.

Without timber harvesting, in the form of clear-cutting, these species lose habitat. There is a lot of timber harvesting occurring on private lands in Ohio, but that type of timber harvesting that removes most of the trees down to a certain diameter, like 12, 14, or 16 inches, does not open the forest canopy enough to create the structure of vegetation needed by these special forest wildlife species.

So, I'm just here to input, you know, not the whole forest clear-cutting, but just about 10% of the forest clear-cutting, every 10 years, put the forest on a 100-year rotation, that would provide plenty of wildlife habitat for early successional, mid successional, and late successional forest wildlife species, for us to enjoy now, and for future people to enjoy down the road. [503]

From the science of forestry and different research projects, we've learned that timber management increases biodiversity of both plants and animals. Natural forests, as defined on the displays downstairs, were resulted forests that are outside of the range of historical variation. In other words, these forests have never occurred in Southeastern Ohio before.

These forests have been managed by humans since the last Ice Age. Witness trees (phonetic) recorded the earliest land survey shows the same tree species composition that exists in the older-story trees today, except with the exception of Chestnut.

However, the earliest European visitors found much less dense and more open forests.

(Inaudible.) Studies have shown that birds and bats using the upper canopy for foraging used managed open canopy stands more than they do closed canopy stands.

Managed forests have been shown to contain greater specie richness in non-woody forest flora plants. Managed forests result in healthier more vigorous trees. These trees will be

more likely to be able to withstand insects, disease, and drought.

The Gypsy Moth is coming. Natural stands are under extreme competitive stress and are more susceptible to these disturbances.

The plants and animals of our forest today evolved in open canopy forest, created by the management of Native Americans. Lack of management of these stands is unnatural, not natural. [603]

2.C.3. Non-native invasive species.

Factors leading to a need for change: The presence of non-native invasive species is increasing in Southeast Ohio. Invasive flora include kudzu, and purple loosestrife, multi-flora rose, Japanese honeysuckle, garlic mustard and tree-of-heaven. The most significant invasive insect is the gypsy moth, which has been identified within the National Forest.

Proposed Direction: Control non-native invasive species.

Few responses were received on this subject. A few commentors expressed concern about the use of control measures such as insecticides and herbicides.

Examples:

Chemical pesticides of all kinds, including herbicides, insecticides, fungicides, and any other chemical killing agents should be prohibited on the national forest. Besides the documented affect of such chemicals on the endangered Indiana bat, these agents are already present in the environment through bioaccumulation and adding to this already heavy ecological burden will only further the detriment of many species that rely on public lands. [101, 104-110, 120, 126-133, 135-140, 142,148, 150, 158, 176-177, 203-204, 260, 339, 343]

2.C.4. Diversity of Plant and Animal Species

Factors leading to a need for change: There is a need to provide early-, mid-, and late- successional habitat on the Wayne National Forest to maintain a diversity of habitats for plants and animals. The management indicator species for the 1988 *Forest Plan* were selected to emphasize species of interest to the public and indicators of ecological change. Information gained in the past 15 years through monitoring suggests that there may be additional or other species that could better reflect changes in habitat composition and quality.

The Wayne National Forest's Regional Forester Sensitive Species Program should encourage an approach for species conservation and ecosystem management. Sensitive Species are defined as "those plants and animal species identified by a Regional Forester for which population viability is a concern as evidenced by significant current or predicted downward trend in numbers and density" and "habitat capability that would reduce a species existing distribution." The Wayne National Forest has completed an analysis to update the Regional Forester Sensitive Species list. This list, and information generated from the preparation of conservation assessments and approaches needs to be incorporated into the revision of the *Forest Plan*

Proposed Direction: Provide a range of ecological conditions to maintain diversity of native plants and animals.

This subject attracted significant interest because of the interconnectedness with the issue of

vegetation management. The primary concern raised was the use of commercial timber harvest to achieve this direction, and again the public comments were sharply divided. A significant number of commentors opposed any timber harvest on the National Forest. A significant number of commentors support timber harvest on the National Forest to achieve specific ecological goals.

Examples:

The Wayne National Forest must continue to be managed for diversity of habitat types in order to sustain viable populations of all native wildlife species.

Since 1968 acreage in the seedling sapling size class has decreased over 50% throughout the state. Whereas acreage in the saw timber class has more than doubled.

As of 1991 the age size class distribution of Ohio's forestland habitat base was 24% seedling sapling, 23% pull timber, and 53% saw timber.

The Wayne Plan needs to provide early successional habitat to address the declines in this habitat type and associated wildlife species.

A mix of forest types and age classes must be maintained to meet the habitat requirements of all forest species native to the region.

The change in forest composition, from valuable wildlife species like oak and hickory, to low value species like sugar maple, red maple, and yellow poplar, have been propelled by a lack of even-aged management techniques.

Management activities, including small clear-cuts, must be employed to promote the shade and tolerant species, like the oak and hickorys, which are so valuable to wildlife.
[585]

Wildlife I would like to see the forest used better as a wildlife refuge. There are few places left in Ohio with the loss of most of our forests, nearly all of our wetlands and all (100%) of the Old growth forests outside the WNF. In the absence of large natural predators human hunters play a large part in population reduction. Yet Human hunters are not the equivalent of large natural predators. In the natural world there is a natural selection, survival of the fittest. With hunting and fishing there is a tendency to extract the biggest and the strongest leaving the weakest to reproduce thereby weakening animal species over time. We have created an unnatural selection that weakens animal species on an evolutionary scale. There is no question that deer are smaller and have smaller horns now than 100 years ago, or that fish are now not only fewer in numbers and diversity but smaller than 100 or 200 years ago. Please consider not just the quantity of animal populations but the quality of life in wildlife management. [356]

An example of this, specific to the Ironton District, are the several reclaimed mine-stripped mine areas which were incorporated into the forest after these mining activities ceased many years ago.

These areas have been "managed" so as to allow them to revert to a natural state, and this has resulted in the appearance and breeding activities of native species, which were formerly not found there, chiefly among them the Henslow Sparrow.

In all of the areas I traversed during the course of my work, one thing was apparent, the number and variety of avian species was always greatest in those areas in which diversity of tree species was greatest.

For instance, in stands of mature white pines, which incidentally is not a native species,

the presence of Pine Warblers was either very low, or in most cases non-existent.

In stands of native pines, the Virginia and Short Leaf, however, the presence of Pine Warblers was easy to find.

In almost every instance where the three species combined, this species of Warbler could also be found.

The point of this, from my perspective, is that the management plan to log selective areas of the forest will not result in harming its health. In fact, it will probably enhance it.

It will allow for a natural successional growth pattern, create a more varied habitat, and promote greater health of trees adjacent to the logged areas, and of course those left standing within the area, if it is not a complete clear-cut, in which case, that area will regenerate with the seeds taken from or deposited by the trees that were harvested. [582]

2.C.5. Other topics associated with Ecosystem Restoration

There were comments related to Ecosystem Restoration which did not fit with the Direction Areas identified in the Notice of Intent. Additional comments include changes to the management areas, and inventory and monitoring, especially Management Indicator Species.

Examples:

Some of the main focus of what I'd like to talk about today is, the Forest Service should focus primarily on monitoring an inventory of what they already have.

The Forest Service knows very little of what is in the forest right now, and part of their mission is to monitor and inventory what they have.

That should be the primary goal of what the Forest Service does in this plan, tell us what we have, tell us what we need, and then how do we get there from here. We're not doing that. There is no monitoring right now, at least not on a grand scale that we need. [556]

I want to point out one important aspect of forest planning that wasn't specifically addressed in our comments but which is very important, and I want to give some suggestions. That is, regarding the list of Management Indicator Species. This list should include some of the declining forest interior species such as the American Redstart, Cerulean Warbler, and Wood Thrush. It should also contain a variety of other species and families, such as bats, salamanders, frogs, fish, turtles, snakes, and even some insects. Predator birds such as red-shouldered or cooper's hawks should be included. The lists in the first round of planning were completely inadequate and badly in need of update. [309]

We do have a problem with the Notice of Intent that was on the revision topics, on Proposed Changes in Forest. We feel that there wasn't provision on the slides there for changes in management designation, or changes in boundaries. We think that that needs to be addressed.

We want to change the designation of particular areas of the forest to a different type of management. And in the list of Current Management Area Classifications, we found that they did not have areas -- have listings for riparian areas with no timber sales. We had to invent our own classification, ORV areas with no timber harvest, ORV areas with uneven-aged management, and high-density trails.

What they made in the old list, you either would have had to choose low-density trails with uneven-aged management, or you had to choose even-aged management with high-

density trails.

We think they should be allowed to have both, and there was no provision for even-aged management with the long rotations, like 120 years, 160-year rotation. The only choice was an 80-year rotation. [62]

2.D. Recreation Management

The Forest Service must help meet the Nation's growing need for outdoor recreation in a manner that protects the health, diversity, and productivity of the land. Demand is increasing for most types of recreation opportunities available on the Wayne. Demand is high for additional Off-Road Vehicle (ORV) trails, horse trails, and mountain bike trails. Fishing pressure at Forest ponds and lakes has been documented to be at least twice the state average. Hiking, backpacking, hunting, and nature viewing continue to be popular activities. While interest in primitive camping remains stable, campers using developed campgrounds are demanding more amenities, such as improved RV pads, electricity, and sewer hookups. Interest in heritage resources, especially pertaining to the Underground Railroad found in the Wayne National Forest, is increasing.

In 2002, the Wayne National Forest will complete a recreation feasibility study. The three-phase study included personal interviews with key stakeholders in gateway communities, telephone surveys with residents of four metropolitan areas surrounding the Wayne and public meetings held in gateway communities to discuss the opportunities for development of recreation facilities both public and private. The Forest Service anticipates that this study will define the range of recreation opportunities that users seek in the Southeast Ohio landscape and provide recommendations related to those, which are appropriate for development on the National Forest.

Key aspects of this topic include:

2.D.1. Scenery Management System

Factors leading to a need for change: A new method for the management of scenic values has been developed known as the Scenery Management System. Forests have been directed to incorporate the new system into their revised forest plans.

Proposed Direction: Provide a visually pleasing landscape.

We received no comments related to the Scenery Management System.

2.D.2. Recreation opportunity.

Factors leading to a need for change: The demand for recreation opportunities on the Wayne has increased since the *Forest Plan* was developed. The majority of persons who commented on *Forest Plan* revision have mentioned increased recreational use of one type or another. Demand is high for both motorized (OHV/ORV use) and non-motorized (hiking, horseback riding, mountain biking) recreation. It is also high for both developed (campgrounds) and dispersed (general forested areas) recreation opportunities. Demand is also high for extractive recreation (hunting, fishing, plant collecting), as well as for non-extractive recreational uses (bird watching, photography, swimming, sight-seeing, foliage tours, etc.). There is debate about what types of recreation uses, and the amounts of the various uses, are appropriate on the Wayne National Forest. Input has also raised the question of what types of uses are not compatible with other types of uses.

Proposed Direction: Maintain a range of recreation opportunities.

Commentors were sharply divided between those in favor of a range of recreation and those who felt that the National Forest should be preserved for environmental reasons.

Examples:

We believe that the emphasis for management of the Wayne should be for preservation of the forest. Generally this hasn't been the case with the Wayne. Like most national forests, the Wayne has been over-cut, overrun with off-road vehicles, sliced by too many roads, and exploited with oil and gas development.

High-quality recreation is extremely important to Ohioans. Independent research has shown that the current Wayne plan is biased towards motorized recreation over other non-motorized forms. Currently illegal off-road vehicle (ORV) trails encompass much of the Wayne to the detriment of other uses and critical habitat. The Forest Plan revision should emphasize increased ORV trail enforcement and the closure of illegal trails. Additionally, illegal ORV trails should be restored while a major effort is made to prevent continued ORV trespass by ORV users who do not use the official trail system. In summary, the theme of the new plan should be to preserve and protect the forest from such degrading activities as logging, oil and gas development, road building, pesticides, and off-road vehicles while natural recreational opportunities should be provided and maintained properly. [101, 104-110, 120, 126-133, 135-140, 142,148, 150, 158, 176-177, 203-204, 260]

[Ohio Multi-use Trail Association] is an umbrella organization to pull together people that basically focus on trail-based recreation, whether that be hiking, backpacking, mountain biking, off-road vehicles, horses, four-wheel drive vehicles, because of all of these activities are trail based, and therefore the amount of trails, the quality of trails, the management of the trails, there's a common theme amongst all of those groups.

We're also -- we see a tremendous need for, not only advocacy of the interests of those groups, which is one aspect of what we do, but also education of people that are in those user groups, on the right way to do things, and the things to avoid, and the right way to use the resource that we've got.

We think that trail-based recreation in the Wayne presents some unique opportunities, not only for recreational opportunities, but also commercial opportunities to create some commerce and some tourism for Southern Ohio.

I know personally that many of the places that we go we spend money. We spend money in the hotel rooms, we spend money in the stores, restaurants, local businesses, things like that.

Trail-based recreation also is one of the most popular uses of the forest. I think if you go down to the forest on any given day, I think one of the predominant uses you will see, besides the extractive industries, is the trail-based recreation.

The 1988 Forest Plan indicated that there would be some inventorying of existing trail, and also the creation of more trail, and those activities have not commenced, or have not been completed, and we would like to see that happen.

We also would like to see the trail system designed, not only to create more destinations for people that are out enjoying the forest, places where they can go, but also corridors to connect the areas -- the existing areas that we do have, so that you can enjoy more of them at any given point in time, and also to connect the riding areas to communities so that we can spend money in those communities [576].

I was born and raised in southeastern Ohio and am very aware of the environmental and economic issues of the area. As a child I fondly recall hunting, fishing and camping with my

family in public and private locations throughout the Wayne National Forest area. I now live in Stark County and have a family of my own to share outdoor activities. I am concerned because some of the activities we enjoy involve off-highway vehicle use. Many organizations would like to ban motorized trails on public lands. Tactics to unnecessarily restrict access to these lands are not in the best interests of the citizens of the surrounding areas.

I have purchased recreation permits for my off-highway vehicle, even though I have yet to make the trip to the Wayne National Forest with ATV in tow. My family also enjoys horseback riding and hiking, but I don't expect the wishes of groups involved in only one activity should supercede the accessibility of many individuals.

*As a member of the American Motorcycle Association, proudly headquartered in central Ohio, I am aware that: * The 1988 Forest Plan made provision for 300 miles of motorized trail in the Wayne National Forest. To date, the Forest Service has only opened about one sixth of those trails to motorized use. * Approximately 95% of the Wayne National Forest recreation permits are sold to off-highway vehicle users. This source of funds could be used to maintain the existing trails and to expand the trail system. * Federal Recreational Trails Program funding is available to the Wayne National Forest through the state. These funds can also be used to maintain and expand the trails system. Southeastern Ohio desperately needs the tourist dollars generated by visitors to the area and jobs created to support these activities. If Ohio does not provide these opportunities I am sure many individuals would not hesitate to travel to West Virginia, Pennsylvania or Michigan to visit the outdoors. As changes to environmental regulations have crippled the jobs related to mining and power generation in the area, the region, or the state, cannot sustain a blow, which would give the area residents little hope of climbing back to prosperity. [244]*

I believe the future of Wayne National forest can and should accommodate all areas of the sport issue. Wayne National forest is big enough to accommodate the motorized sports as well as the walking pathways. I am for an area to be un-maintained for OHV, such as Jeeps, quads and dirt bikes. As a taxpayer this is what I am recommending that you seriously consider. I think the people who are into riding the trails with their jeeps, bronco's and scouts pay quite a bit in taxes. I know, I am one of them. I am also on the other end of the sport of 4 wheeling and I am talking about the companies who manufacturers the parts for the people who have 4 wheel drive vehicles. Without having anywhere to go 4 wheeling the manufacturing industry will eventually start on a decline. I hope you are aware that we are coming out of a recession. These businesses also play a big role in the tax issues. I am also bringing up the notion on having 4x4 clubs do some type of maintaining of the trails on a regular basis. Ohio has many ,many 4x4 clubs who are willing to volunteer their time to give back. I hope you hear my plea to open an area of Wayne National Forest for the motorized vehicles. [387]

The commitment of forested areas to recreational uses must be balanced among the various recreational activities and sited in areas that are appropriate with respect to preserving the integrity of forest habitat and species diversity. Where appropriate, backpacking and hiking trails should be expanded to provide access to non-roaded areas where extractive activities and motorized recreation are banned.

Additionally, off road vehicle (hereinafter "ORV") use on public lands should only be

permitted after a thorough, scientific review of national forest land to determine which areas are appropriate and suitable for ORV use. The review process must include the opportunity for public participation and comment, and the revised forest plan should anticipate the need to adequately monitor the use of national forest land for ORV purposes and immediately close and repair trails that are suffering environmental damage. Trails that are found to be suitable should be posted as open, and adequate steps should be taken to ensure that ORV users only utilize trails posted as open. Full size vehicle trails (e.g. for use by Jeeps and other large vehicles normally suitable for use on primary roads) must be completely prohibited on the Forest due to the extensive damage that they will cause if their use is allowed on forest trails. Further, existing ORV trails should be relocated to less environmentally sensitive land (e.g. lands that contain reclaimed strip mines and old gravel quarries that lay on the perimeter of the forest units), and the plan should not provide for the creation of additional trails unless an equal number of trail miles located in the interior forest areas are re-vegetated and restored. Overall, ORV trails must be re-designed and compacted so that they adversely affect the smallest portion of the forest possible.

Finally, the revised Forest Plan must ensure that non-consumptive forest users are not charged for the use of the National Forests. Existing fee demonstration locations should be eliminated. [330]

One of the lessons learned by public forest managers is that certain activities are not compatible with each other. On the other hand, separate trails cannot be created for every single separate activity if the forest ecosystem and safety are to be maintained. I have witnessed first hand the destructive damage that a four-wheel drive truck can do to a forest in a very short amount of time. An eighty-year old acre of forest near my house was almost completely destroyed in two hours by a construction worker playing with his 4-wheel drive truck. Three years after his truck drove ruts around the trees, only a few trees still survived.

Likewise, ATVs and dirt bikes, although not quite as bad as 4-wheel drive trucks, can do serious damage to a forest's shallow root systems and to the herbaceous layer. Further harm is done to wildlife by the noise and pollution such equipment spews out. A single dirt bike with a two-stroke engine can put out more pollution in an hour than a dozen cars in the same amount of time. The problem is further exacerbated by the fact that a certain percentage of such riders refuse to stay on established trails and/or actively seek to create their own new illegal trails. Unfortunately, experience teaches us that many of the people who engage in such "sports" have little interest or understanding of nature, wildlife or the forest ecosystem.

Such activities must be classified as heavy recreational use with a high potential for damage to the forest in the long term. As such, they should be strictly regulated with strict enforcement of violators with heavy fines. These activities should be relegated (if not outlawed altogether) to areas where they can do the least damage, such as on reclaimed strip mines or gravel quarries. They absolutely should not be permitted to go beyond perimeter areas into the forest interior. There are a number of private areas where such activities can occur outside public forests. For example, just south of the Ironton Unit on the Hatfield-McCoy preserve in Wayne County, West Virginia, there are 480 miles of ORV trails which are being expanded to 600 miles of trails.

Some fans of these activities have been lead to believe that they were promised a lot more trails. The U. S. Sixth Circuit opinion effectively nullified any such expectations or promises (if they were ever made). Perhaps one good new area would be on the Marietta Unit near a

heavy concentration of oil and gas wells. There needs to be some fairly large tracts of quiet undisturbed habitat for Ohio's nature to survive in. Mankind has the entire rest of the state to play in. It is a matter of priorities, but we have given forest interior and old-growth species nowhere else in the state to survive. It is time to enforce the Endangered Species Act in Ohio, and conservation groups will do it if the Forest Service doesn't. Unfortunately, the Forest Service now proposes to add eight more miles of ATV trails next to Monday Creek on the Athens Unit. This is totally inappropriate. Riparian habitat is among the most sensitive of areas and hosts many rare and state-listed species. ATV trails should be swapped from the Ironton Unit to the Marietta Unit.

Horse Riding And Mountain Bikes Horse riding and mountain bikes are an intermediate level recreational activity. Over time they do some damage, but not as much as motorized vehicles. They are relatively nonpolluting and less noisy, and thus somewhat less disturbing to wildlife. We believe these activities can be accommodated together on the Wayne on the same trails with each other. We recommend that they be placed in perimeter areas of the forest units on the less sensitive habitat (i.e. not near rare species populations or the most pristine parts of the forest ecosystem). We recommend against allowing mountain bikes using the same trails as hikers. This could cause safety problems (i.e. bikes running into hikers) and would mix light recreational use with intermediate recreational use, with resultant disturbance to more sensitive wildlife species. The enjoyment of birders and other hikers observing nature and enjoying solitude will be disturbed if mountain bikes use the same trails.

Hiking, Backpacking, Photographers And Bird Watchers There are light recreational users which should have the widest access to the forest on the same trails, including the interior areas. Even so, some areas of the forest should be designated nature preserves or wilderness where only occasional official guide-lead trips would be permitted. Educational literature should educate the public about inherent risks (water, first-aid, lights for darkness, wildlife rules) and the lengths of trails. Primitive camping for backpackers should be in designated areas only.

Hunting Hunting in one form or another has taken place in southeastern Ohio for some 15,000 years, and has not been detrimental to the ecosystem during most of that time when appropriate limits/seasons were respected. Of course, there are safety considerations. Hunting should not occur adjacent to horse trails (horses can look a lot like deer from a distance) or near hiking trails where hikers are walking at that time of year. The tendency to allow hiking and hunting on the same trails at the same time is a tragedy waiting to happen, as hikers usually don't wear hunter's orange.

The primary problem with hunting has been the tendency of the Forest Service to manipulate the ecosystem (often at the request of specific hunting groups like the Ruffed Grouse Society) to favor those species the hunters like to shoot. This contributes to the bias toward early successional forests and periodic cleared areas. This is totally inappropriate. Either ruffed grouse need early successional forest or they do not. If they do not, then a shift toward old-growth forest on the Wayne will not hurt their populations. If they do, then it must be conceded that the majority of southeastern Ohio is perfect ruffed grouse habitat and hunters do not need special management of the Wayne to enjoy their sport. Old growth and forest interior species, on the other hand, have nowhere else to go in Ohio for their survival.

[368]

Off Road Vehicles The previously mentioned issues regarding fragmentation, road building, threatened and endangered native species, and inventory and monitoring also apply to off road vehicles (ORV's). For too long ORV's have left indelible scars on the Wayne National Forest landscape. The primary function of the Forest Service in regards to ORV's should be the enforcement and closure of "user developed" or illegal ORV trails. Enforcement of the current trail system is essential to insuring the ecological integrity of the National Forest. Illegal ORV trails dissect enormous swaths of the Wayne forest system, further fragmenting already heavily bisected forest and further degrading critical habitats. Noise, pollution, erosion, compaction, and fragmentation all contribute significantly to the deterioration of forest habitat. A moratorium should be placed on further expansion of existing ORV trails. Until the Forest Service can adequately stop the colonization and expansion of illegal trails no new trails should be built. New trails will only open new expanses of currently unmolested forest to illegal trails unless the Forest Service reins in illegal use.

Mountain Bikes Until illegal ORV trails can be controlled the desire of mountain bikers will not be met. Mountain bikers have specifically requested access to areas away from ORV's. Unfortunately due to the prevalence of illegal ORV trails these areas do not yet exist. Without strict control of illegal ORV traffic any new trails developed for mountain bike use will assuredly be claimed by ORV's.

Game Species Once plentiful in the native forests of Ohio free from human manipulation, Turkeys were actually extirpated from Ohio in the 1830's before western Europeans began the vast clear-cutting that would forever mar Ohio. It was over hunting that decimated the native Turkey populations, not a lack of suitable habitat. The idea that Turkeys necessitate only large forest opening habitat to prosper is historically inaccurate. Wild Turkeys can and do thrive in mature forest ecosystems.

Pheasants are non-native and actually indigenous to China not the United States. The Forest Service should be managing the Wayne for the preservation of native species. By 1904 White-tailed Deer were extirpated from Ohio in much the same fashion as the Wild Turkey. It was over hunting in the form of unregulated bag limits throughout the 1800's that ultimately decimated the deer population. Again, it was not a lack of suitable habitat that led to the loss of deer but an over zealous approach to hunting. In fact, before 1775 the deer population in Ohio was considered "healthy and stable because of good food and cover" (Ohio History Channel, <http://www.ohiokids.org/ohc/nature/animals/mammals/wtaileddeer.html>, accessed June 27, 2002). These pre-settlement populations existed in the virgin forest ecosystem dominated by the same old growth that greeted early American settlers. Historically speaking, mature forest ecosystems and the abundance of White-tailed deer are not mutually exclusive. [351]

A number of commentors identified the need for the Wayne to establish more areas with wilderness-like qualities that provide opportunities for quiet and solitude.

Last fall I headed down to Wayne National in hopes of finding a sizable wilderness area to do some primitive camping by myself. I understood that there are places in the Forest where one can camp for 14 days at a time unbroken and was very disappointed to discover that, in all that green on the map and a whole week, I couldn't find anywhere to get far enough away from ATV trails and party sites that I didn't hear gunshots and drunken yelling at night. After talking to the nice folks in the Main Office I got a new understanding of the National Forest system and what the idea is, how it operates in Ohio, but it was unsettling. I

live and work in Dayton. I love Ohio and the Midwest and enjoy camping and hiking a lot. While I never visited until last October, I had always kept Wayne in the back of my mind for the next opportunity to get out and away, thinking how nice it is that we would have something so close to home comparable to the wildernesses out West. The reality was something of a letdown. Now that I've come to terms with that, I realize that Ohio is a unique place, and one that must present unique problems to the Forest Service. It isn't the Rockies, but I think it isn't any less special. There are things I saw out there even between the bed frames and old television sets dumped on your land that can't be labeled on maps or with dollar signs. They are wonderful and worth attention. [174]

I'd like to -- I'm very encouraged by your ecosystem restoration that you're presenting tonight, and I hope that goes well. I would like to see more than wilderness, an ancient forest area that is contiguous, and large enough to be relatively sustainable and not grows at some zone section.

And this would tie in with an opportunity for seclusion. In the area that the state's growing, over the next 100 years we may not have anyplace where we can go to be alone.

There is still a united remnant band of Shawnee that are state recognized here in Ohio. There are other people that also fast in the spring and the fall. When the -- when the buds are as -- or the leaves are as big as your thumbnail, or a beaver's ear, people go out in the Spring, and it's usually for four days, over 30 days, you know, people rotate.

There are Buddhists, Christians, Islam, New Age, Existential Meditation, if you want your own Walden forest or pond that would be a nice thing to have, to think about over the next 50 years.

In tying in with that, I would also like to see us to be able to have a program where you could do off-trail orienteering, and backpacking, and make sure that that's maintained for those of us that may not want to be eaten by bears, and this is a great forest to do that kind of thing.

And clear-cutting only for restoration ecology for ecosystem and critical wildlife and wild plants restoration ought to be the program for the Anthony Wayne as we don't have that in many areas that are wild in Ohio that are that contiguous.

I'd like to see more ecosystem restoration targeted for river otter, and bobcat, turkey, and eagle, to restore the ecologic integrity of our state.

And as we approach the 200 anniversary of our statehood, and remember that this was one time the Northwest territory, like in Amazon that was road-built and destroyed, like Fredonia and the Amazon, through roads and canals that continued to be fragmented.

We need to find a way to solidify what very little land we have because I don't see there's an opportunity for eminent domain in the future, but I do see an opportunity for more shrinkage and more fragmented. [581]

A rumor circulated prior to the start of the public hearings that the Revision Topic would address a proposal to eliminate hunting on the Wayne National Forest, and the future of hunting became an issue for a number of commentors.

Please add my voice to the many others who are speaking AGAINST the proposed plan to declare all or part of the Wayne National Forest a "sanctuary" which would close it to

hunting and other appropriate uses. The forest constitutes an important recreational resource for thousands of Ohioans throughout the year; gratuitously denying the state's people access to sound, scientifically determined and then carefully managed activities really makes little sense.

Colleagues and I have enjoyed hunting for ruffed grouse through the fall and then part of the winter. In the spring, we've hunted turkey. Each visit is remembered and , over the years, increasingly cherished. The Wayne is very special to us and we respect and treasure it. Our trips typically last a few days and we've contributed to the business economies in numerous small hamlets located in the forest. We've always been made to feel welcome by local folks and government personnel we encounter.

Restricting the lawfully designated used of this valuable recreational resource places a burden on those of us who have respectfully enjoyed it and might further damage the already struggling economies of the communities located there. I urge you to carefully consider the proposed change and rule against it. I strongly desire that my children and my grandchildren can, if they so choose, have the same options, opportunities and satisfactions that our publicly owned wild areas have afforded me. [206]

No hunting or fishing (or limited permits with fees).

As with logging and timber sales adversely affects the surviving plant life, hunting has proven to cause an unnatural selection in animals. In addition to disrupting the balance of natural ecosystems, the practice taking the best specimens corrupts future generation of the hunted species. This in turn disrupts all plant and animal species that these animals would have interacted with. The damage cascades and could be stopped with a simple rule. Should the current policy of allowing hunting not be reversed, it should be only be accepted on a very restricted permit bases. The permits should allow a limited number of persons to kill only a limited number of animals for a limited number of hours or days. These permits should come with a fee that is in direct correlation to the cost of actions it permits and, thereby, dedicated to the Wayne National Forest exclusively. [381]

Some people expressed the desire to see recreation restricted if it could be determined to be detrimental to the environment.

No trail cutting: Similarly, there is no need for trails to be continually cut into the forest. Trails are not naturally occurring feature in a forest. The people of this area tend to forget that this area used be all forest. The interstates, roadways, our very neighborhoods are enough trails as it is. -No off road vehicles (or limited permits with fees). The acceptance of non-forest service vehicles in the forest must be stopped. This hobby has no business in a national forest, especially one as small, fragmented, and fragile as the WNF. As mentioned, there are hundreds upon hundreds of publicly funded and maintained trails already established in this state; they are called roads. To listen to ORV advocates speak of having to drive hundreds of miles to get to the Wayne Forest trails, and then complain of the mere 80+ miles of them, is laughable. There isn't any way to 'Tread Lightly' in 2 ton vehicle. Nor is there any way to operate machinery without expelling various harmful pollutants. Nor is there any plausible reason why machinery should be in a forest. I too own a 4x4. I too enjoy driving it very much. I differ from these people in that I take responsibility for how I use it. Just because it can be driven somewhere, doesn't mean it should be. There are some places it

does not belong.

It should also be acknowledged that there are, in fact, many other locations in the state for ORV recreation. -No new construction (other than for rehabilitation of area). As noted above, the construction of new facilities is unnecessary. It carries with it the same costs and problems associated with forest roads. There should not be any National Forest financial resources going to the construction of more facilities, more trails, bridges, buildings, out houses, camp grounds, museums, walk ways or anything else. These only detract from the natural beauty of the forest for wilderness recreation and add nothing. Such facilities take away habitat and increase maintenance costs.

Conclusion The important focus of a revised forest plan is self-evident. It is the Wayne National Forest. It is not the Wayne National Tree Farm; not the Wayne National Energy Resource Reserve; not the Wayne National ORV Facility; and not the Wayne National Hunting Grounds. It is a forest and should be left to be as a forest will be. If the WNF policy is to be truly set up for multiple uses, it must consider a weighted average of all its uses and their importance. Certainly there are industrial, commercial, and recreational uses for this land. There are also many, many species of plants, birds, fish, insects, etc. whom depend on this land for food and shelter and basically to live their life. Surely, survival of these many voices are more important than the recreational uses and resources of 1% of the state territory. Please take on the only responsible policy of zero extraction and restricted intrusion so that the forest here for everyone in the future. [381]

Construction I do not want to see National Forest financial resources going to the construction of more facilities, more trails, bridges, buildings, out houses, camp grounds, museums, walk ways or anything else. These only detract from the natural beauty of the forest for wilderness recreation and add nothing. I would rather see financial resources go to land acquisition than the building of new structures. Please use money to add forest to the National Forest not increases cost to lose forestland.

Mountain Bikes. Please designate one trail or two to mountain biking. I see no reason why this should create a problem as long as it is not being done on hiking trails. It should be restricted form hiking trails.

Trails. Please add no more new trails. Do not put any more facilities, bridges walkways, hand rails or steps on trails. Leave the WNF natural. It wastes money and contributes nothing. [356]

2.D.3. ORV use on the forest.

Factors leading to a need for change: The current plan restricts off-road vehicle use to designated trails or use areas. The *Forest Plan* does not prohibit the designation of additional trails or use areas.

ORVs are restricted by *Forest Plan* direction to designated trails, but these trails do not seem to provide the recreational experience desired by many of these users. As a result, many areas adjacent to designated trails are riddled with illegal, user-developed trails. ORV users have expressed confusion regarding which trails they are allowed to use. In addition, ORV users have also expressed a strong desire to have additional trails built to meet the goals outlined in the 1988 *Forest Plan*. Some individuals in the public comments expressed the feeling that ORVs should be prohibited on the Forest if they could not be restricted to the trails to prevent resource

damage. While a major change in plan direction for off-road motorized use does not appear warranted, it may be possible to refine direction to improve recreation experiences, improve resource protection, and reduce unlawful use.

Proposed Direction: Provide trails for motorized and non-motorized users.

The comments received reflect a range of desires that are apparently related to the commentor's personal desired forest condition. We heard that motorized trails should be increased and also eliminated, that non-motorized trails should be increased and also not increased.

Examples:

I'm here tonight representing the Ohio Horseman's Council. We have trails, horse trails in the Wayne National Forest in two -- well, actually, in three locations.

What we propose is that these trails be maintained, or sustained, that we keep the trails, we don't lose any trails, and we would like to actually see more trails, particularly here in the Athens region.

We have a small area of trails here in the Stone Church area, which are primarily on abandoned strip mine areas, surface mine area, they are not particularly picturesque trails to ride.

And since the institution of the users fee for the trails, a lot of the people have quit riding these trails. It's just not worth paying money to go ride what few miles of trails there are there.

There's a lot of land in this area that could be developed for trails in the future, we would like to see that.

We'd also -- we are in favor of multi-use trails in areas that are tightly restricted, or congested with the small land areas. But in the case of the Wayne National Forest, there's a lot of land there, and we would like to see separation of trails.

Keep the horses separate from the motorized, and the non-motorized wheeled vehicles. They just don't tend to get along real well. [504]

A number of commentors who favored expansion of the ORV trail system complained that the WNF had not built the full 300 miles of trail authorized by the 1988 plan, which they indicated had been 'promised' to them.

The first thing I would like to bring up is the fact that almost fourteen thousand (14000) people bought permits to use the trails in the Wayne national forest and they have not notified that their recreational use of the Wayne is in danger of being stopped or changed by the process. They have been excluded from the process as a privacy issue, yet you do not have to publish their addresses to mail to them. The only privacy issue is if they want their responses to be public record. The Wayne established the ten scoping meetings around the state to give everyone a chance to participate in the system yet you only mailed to fourteen hundred (1400). It can be argued that the fourteen thousand people most interested in the Wayne, those willing to pay to be at the Wayne, have been ignored, boosting the weight of the folks you have sent to who may have free access to their chosen recreation or have the desire to other types of recreation eliminated. Before the 1988 plan started the Wayne was open unless posted closed and six hundred miles of trail was documented. The 1988 plan called for three hundred miles of trail in the first decade. The "goal" was not met.

When you considered the Wayne has not added any significant mileage since 1988 one would believe no attempt was even made to meet the "goal". The primary "goal" of one hundred miles of trail before Labor Day 1988 has not been met yet on the Athens unit. Trails on the Wayne by definition are fifty (50) inches or less, by this definition the Wayne has gone backwards since opening. The Ironton trails standards appear to be followed better than Athens unit. The number of trails in the Athens unit over six feet wide are wider than a large number of township right of ways in use in Vinton and Jackson County defeating the fifty inch standard. If we cannot have trail separation by width then we should at least make sure all ORV trails conform to the fifty-inch standard and they should not be maintained in a fashion that increases width and speeds by making them so wide and "clean" that speed is the only way to feel challenged. A grant applied for from RTP moneys over four years ago has not been used and the person in charge of that project who admitted being against all ORV use had succeeded in stopping any new grants to the Wayne until this year. I have never heard about their firing, leading me to believe they are still employed in spite of not doing their job. The Wayne has passed on over three million dollars in RTP money in the last three years. The new plan must aggressively seek these moneys. The RTP program would multiply the demo fee by five. Any plan that does not emphasize this strategy would be biased against the folks who provide these fees. Therefore I believe the first thing that planning must institute is ensuring the three hundred miles of trail as a base line for the off pavement community in the new plan with a time line for it's completion. There have been plans submitted in the past that have dealt with this issue that have never seen the light of day that should be considered immediately. The current plan isolates the areas for ORV use and cuts it off from the surrounding communities. The Marietta unit has never even had a trail plan proposed despite community interest. Corridors should be laid out immediately to tie the ORV areas to the local communities to provide economic benefit to them. The Wayne has not provided any PILT moneys for over eight years and is a major reason why the area schools are depressed. Corridors would reestablish the relationship the off pavement riders used to have with business in New Straitsville, Buctel, Murray City and countless other little communities in areas around the Wayne. The county commissioners in the Marietta unit area have been to all the meetings held for every reason and they are begging for trails. The benefits to the area business from the riders would be a boon to these areas. Making destination trails instead of just "loops" would subdue a "race track" mentality that isolated trail areas can foster. Every meeting in April had local politicians, business owners and public service employees wanting ORV/Multi-use trails like the Hocking county / Nelsonville area has. The Wayne needs to contact local landowners for agreement or leases to connect the trails until land purchases can be made to consolidate the area. Long-term leases may be the only way to connect trails due to the spiraling cost of land acquisition coupled with foot dragging in the past. Saying the Wayne cannot make the trails system work as promised is ingenuous. The only thing needed to make the system work as promised is dedicated effort. As long as folks are allowed to say they cannot or will not go forward, if no progress is an acceptable result, as it has been in the past, then no plan will succeed. There must bias against trail use especially against any kind of off pavement recreation, as non-implementation of the current plan, with the availability of the demo-fee program money shows extreme bias against trail use. Expansion of all trail must be a cornerstone of the new plan Area designation allows use in the area consistent with the designation in every area except the designated ORV areas. The ORV area must stay on designated trails, ignoring

trails that had been used for years in that very area. Planning could designate trail corridors thru other areas with strict marking and enforcement to keep people on those trails. We would mandate the highest level of enforcement to keep folks in line if needed. Yet in the areas set aside for ORV use it is still considered close unless posted open, why? When a user defined trail is found why not see if it holds up, see if it gets enough use to be a problem? Trails can always be posted closed and enforced to the point of pain. On the other hand some of these trails may not be a problem, they might even be better trails due to the low speeds rough trails mandate. The state has never been approached by the Wayne for ORV corridors as provided by law. Before OMTA asked the local commissioners to investigate the liability issue it had never been asked, why hasn't the largest provider of off road recreation pursued these corridors? The Wayne plans need to include not only corridors to get to local communities but to other Wayne holdings. Using the township rights of way would allow use of fragmented sections of the Wayne that are big enough for recreational use but not big enough for grand wilderness exclusions. A number of Wayne properties are isolated "dots" that are hard to use in the Wayne's comprehensive programs. These areas could be tied together using the ORV route designation with trail loops put in them or have them designated for open riding areas. Open riding areas have repeatedly been asked for and could be distributed around the Wayne. The Wayne by not using these areas have violated the multi-use mandate of the Forest Service by making these areas exclusive for local land owners and exclusionary for the publics. You have to go no further then the Union Furnace area to see areas that have been used for over forty years as riding areas turned into five hundred acre and bigger private parks for a few "lucky" land owners while the general public does without. Logging areas are usable as trail areas and some trail areas may be prime places for future logging but logging must not be associated by definition with ORV and trail designations. It does not take much imagination to see trail use wiped out by declaring a new area number and saying trail use is not allowed by the new area definition. Trails should be allowed anywhere the ground conditions allow them to be located All area designations should include trail use. Trail use is Family recreation and all users enjoyment is augmented with a trail system that goes to a verity of places. The new Wayne plans needs to address the Value of trail use. The existing plan says motorized use decreases the value, yet the trail system is the most popular recreation resource at the Wayne. The most popular must be the most valuable aspect of the area and worth the most. The new plan must have time lines, the off road recreation community had a time line when they lost their six hundred miles of trail, the Wayne must respect that with a time line for trail additions. The new plan must divorce trail use from the logging plan; all areas must be open for trail use. Not all areas of every definition are suitable for trails yet all types of areas should be accessible by trail. The plan should capitalize on the benefit of the roads and trails logging uses to increase the benefit to high clearance vehicles before and after the sale. Corridors for trails could have multiple trails laid in them to provide separation by users. Service roads and township right of ways should be capitalized on and used for larger recreation uses such as four wheel drive. The user groups could "adopt a road" saving the Wayne from maintenances costs even as they provide a benefit. The 1988 plan called for involvement of clubs and associations yet there has yet to be any outreach to them. The Wayne should take advantage of the logging roads and oil well access roads by making them "trails" for full size high clearance vehicles. These roads could be user maintained as well as all of the Wayne access roads could be used to provide recreation as well as revenue. A tiny fraction wanted to turn

the Wayne into a private playground with no wheels, no forest harvesting, none of the uses that were in place from the 1920's until today that made the Wayne the jewel it is today. We would be better off to actually do what the 1988 plan said to do then back off it's permitted uses in a new plan dictated by anti-recreation, anti-human, anti-access elitists. [361]

The American Motorcyclist Association (AMA) is a not-for-profit organization, founded in 1924 and incorporated in Ohio, with more than 270,000 enthusiast members nationwide, nearly 18,000 of whom reside in Ohio. Our members are interested in any action that may affect their enjoyment of motorcycle or all-terrain vehicle (ATV) recreation. Thank you for this opportunity to provide comments regarding the Notice of Intent to prepare a revised Forest Plan for the Wayne National Forest. Please make these comments part of the public record. Near-term expansion of the motorized/multi-use trail system As we stated in our preliminary comments (presented at Logan, Ohio on June 13, 2002) we want the Forest Service to expand the off-highway vehicle trail system by immediately moving toward the 1988 Forest Plan's goal of 300 miles of off-highway vehicle trail. The plan called for 25 miles of trail to be added each year over a 10 year period for a total of 250 miles of motorized trail. Furthermore, a second phase expansion was to add an additional 50 miles of trail for a grand total of 300 miles. The current plan's Record of Decision records the rationale for the planned trail mileage: A large number of people were opposed to the proposal in the Proposed Plan for 150 miles of ORV trails in the first decade. They felt that decreasing the miles from over 300 miles of existing trails to 150 miles would not meet demand and would cause overuse and possibly environmental damage on the limited trail system... In order to provide trail systems that are long enough for extended rides on both the Athens and Ironton Units of the Wayne, a minimum of 250 miles is needed (14). Despite the public's assertion in the 1988 plan that 150 trail miles were unacceptable, the Forest Service has only opened about 116 miles of motorized trail. Clearly, the Wayne National Forest is well short of the planned total of 300 miles of trail or the "minimum" of 250 miles. The first goal of the new forest plans should be to expand the trail system to 300 miles of motorized trail. We urge the Forest Service to meet this goal by 2005. In the past the Forest Service has cited a lack of funding for trail construction and maintenance as the primary reason for not expanding the motorized trail system. However, funding sources that were not available or considered in the implementation of the 1988 Forest Plan could be used to rapidly expand the trail system such as the Fee Demonstration (fee demo) program.' In fiscal year 2001, off-highway vehicle users purchased approximately 97% of the more than 12,000 recreation permits sold. The volume of permit sales not only represents the demand for motorized recreation opportunities but also a funding source that is likely to increase as the trail system is enhanced and expanded. Additionally the Forest Service can use recreation permit revenue for grant matching funds allowing the Wayne to aggressively pursue Recreational Trails Program (RTP) funding through the Ohio Department of Natural Resources. As there are few public motorized recreation facilities in the state, the Forest Service could access much of the motorized portion of Ohio's RTP allotment. We believe that other developments since 1988 will also facilitate the rapid expansion of the trail system. The Wayne has expanded and consolidated its land holdings, giving the Forest Service more flexibility in trail placement while further reducing unwanted impacts on private landowners. The motorized recreation community is larger and perhaps better organized thus providing the Wayne with a ready source of volunteers. And some of the groundwork has already been

done, such as the recommendations made by the Citizen Task Force for the Trail Master Plan, which was developed in the early 1990s. Mid- and long-term goals for the motorized trail system. The initial Forest Plan goal of 300 miles of motorized trail should be viewed as the first step in an ongoing expansion. According to the Motorcycle Industry Council the annual volume of off-highway motorcycle sales has increased 159% since 1988. In the same time period the volume of all-terrain vehicle sales has grown from relative insignificance to over 800,000 units per year. Dealer News, a power sports industry publication, estimates that the number of all-terrain vehicles sold in 2002 will rival the sales of the entire two-wheeled motorcycle market (on- and off- road combined). Such explosive growth justifies a several fold increase in the available trail mileage. But we recognize that regulatory and practical limitations would not allow unlimited expansion of the trail system. However, we do believe that the system could be expanded to 600 miles of trail by 2015. Assuming that the target of 300 miles is met by 2005, we would suggest an intermediate goal of 400 miles by 2009. How the Forest Service can ensure the success of the trail system. We recommend that the Forest Service form a citizen advisory group to give specific recommendations on both the expansion and maintenance of the trail system. There will be many issues ranging from trail placement to needed facilities and amenities that will be specific to any new or expanded trail route. By working with a standing citizen advisory group the Wayne will be able to provide a quality recreation opportunity. Though the citizen advisors should be consulted on a case by case bases, the Forest Plan should make provision for expanded camping, parking and trail head facilities as well as the need for improved and expanded trail signage. [291]

A number of commentors supported the continued use of ORVs on the WNF and the expansion of the trail system because ORVs provide access to natural areas for individuals with disabilities.

The Sierra Club and other vociferous organizations would like to see all trails closed to everything except hiking. But I enjoy the forest. I am 64 yrs. old and cannot hike like other. The ATV allows me to get deep within the forest and enjoy it. I pay taxes and I should be able to enjoy public facilities. I stay on existing trails, I am a responsible person. [217]

When over 20% of the American public is classified as disabled, where less than 50% of the remaining 80% are considered physically strong enough to carry a pack, and actually do backpacking, or hike very far at all, access to the forest is important, a good trail system to disperse the impact of recreation, and to benefit all of the forest users, would be a big plus. [440]

And I'm here tonight just to share a few more ideas and ask that everyone consider the needs of, not only the forest, but all people.

As I said, I am a new appreciator of the forest. Nature was something that, due to my disability, I was fairly limited to appreciate. Those of us with disabilities, or who are very impaired, often have a difficult time getting out there and enjoying nature. It's a very difficult thing to be independent at.

My husband then introduced me to the sport of four-wheeling, and I have become immensely involved in this enjoyable activity. It has taught me, not only to enjoy nature and learn more about nature, but to appreciate the resources and the natural beauty that the world around me provides.

It has also allowed me to broaden my horizons and given me the ability to have freedom and enjoy activities with all individuals. We have many individuals in our group that have some type of limitation, or others.

It is a gift that is very hard for me to express, other people having an activity that all people can enjoy -- that my husband, who is not disabled, can come out and enjoy with me on his level. I have an activity that I can enjoy with him, rather than an activity that he can enjoy with me.

And when I looked up these meetings, I felt very driven to express to people the importance of maintaining access for all individuals to the forest.

I accept everyone's views, and realize the importance that everyone's views have, but I ask that everyone, the Forest Service, and all interested individuals, when considering the use of the forest, remember that some activities -- all people's activities need to be considered so all people can enjoy and protect the forest.

Allowing people to have vested interests in the forest guarantees that everyone will work to the interests of the forest, whether it be individuals that enjoy motorized activities, or non-motorized activities, maintaining the access and encouraging people's interest in the forest so they're informed. [578]

A number of commentors suggested that ORV use provided economic benefits to communities adjacent to the trail systems.

In response to the NOI to revise the 1988 forest plan, I would like to say how much of a benefit it is to have that area open for ATV use. Myself, friends and family travel to different areas to ride and experience a good time. I do travel out of state quite often because of the lack of riding areas in Ohio, but would be more inclined to go to Wayne more often if the trail system was expanded. I would like to keep my money in Ohio if at all possible and feel that user permits fees can be adjusted relative to the area available to ride. (The more trails that are opened and maintained, the cost of permits go up) This is certainly a less expensive alternative to traveling out of state! [173]

[Western Reserve Four-Wheelers is a not for] profit organization that has been in office 12 years in Ohio.

Our main concern is back in 1988, when this forest plan came around, we were promised more trails, and the trails that we did have, that they were going to be maintained. And none of this has happened. A lot of the area that was opened, that we were allowed to trail ride on, had been closed.

We go down to a general store down in Washington County, and for two years the store has been trying to close. The reason the store is still open is because we bring a lot of funding to the area.

On the cost of durable and non-durable goods, we have spent a total of over \$14,000,000.00, and this was taken back in the year of 1999.

For non-durable goods, we have spent over \$5,000,000.00. And durable goods we have spent more than \$9,000.00 (sic) and this is for the year. With inflation and everything, you know that we have spent more than that.

We believe in the tread-lightly principles. Everything we take into the forest, we bring out, and our main thing is, we were promised land and we want that land to trail ride on, and that be requirements of being 50 inches wide, because we have big SUVs, we have full-size

vehicles, we have full-size trucks, and we have jeeps, and we are asking that we keep more lands open, and the roads that we do have are -- is maintained. [537]

Several commentors asked that the trail system be segregated to give motorcycles trails that are more challenging.

Examples:

I really like the Wayne National Forest. However, the Forest needs more trails for everyone to use, especially trails for more off the road two-wheeled motorcycles. The current trails are wide, and thus, not challenging for the two-wheeled motorcycle. Better yet, maybe you could create an off the trail open riding area. Many clubs and organizations would like to adopt a trail to help maintain new and existing trails. [391]

A number of people also asked that the WNF allow full-sized four-wheel-drive vehicles to use old roads.

Examples:

Please consider more opportunities for 4x4 vehicles. I unfortunately have not traveled much in the Athens or Ironton district, but know that roads exist in Marietta district that are gated. These roads would cost nothing to reopen because 4x4 clubs could reopen if allowed and we do not require maintenance of the "high-clearance" roads. In fact, we prefer that the roads are not maintained unless dangerous (we can take care of the dangerous sections as they arise). After talking with some of the trustees down there and riding township roads for a few years in that area, I am convinced the economic benefit helps everyone. [200]

I would like to see some 4x4 truck/high clearance vehicle trails opened up in the Wayne. I have been told that there are forest roads and township roads that are already in place in the Wayne. I'd like to see some of these roads opened up to 4x4 trucks/high clearance vehicles. We would prefer that these roads/trail not be maintained, just simply marked on maps and with trail markers to ensure that users stay on the prescribed paths. I am a member of the Ohio 4x4 Trailriders and I'm sure that our group as well as others would be glad to assist in laying out these trails, installing markers, and keeping the areas clear of trash and debris. Our group follows the Treadlightly ideals, and we always leave the areas that we ride cleaner than when we came. [211]

A few commentors asked the WNF to restrict access of motorized users to certain areas in order to improve the experience of other recreation users.

Example:

ORV use in separate park from Low Impact Activities. Ultimately, I think ORV should not be used on public land, due to the damage they cause to the land as well as noise pollution. However, a reasonable compromise is to have ORV use in a separate section of the Forest that the low impact activities (backpack, hiking, wilderness area). Since the Wayne is already in three distinct chunks of land, this is a perfect scenario. And I don't mean on the same

section but farther way. I mean ORV to a different region (3 chunks) on Wayne! [224]

A number of commentors asked the WNF to ban all motorized use.

Examples:

Ban all ORV use in the forest except on existing presently open paved to gravel roads; [214]

DIRT BIKING Although some dirt bikers follow the rules and stay on designated trails in prescribed areas, many do not. This is disruptive, because of noise, pollution, erosion, and other disruptive factors, to other uses (both human and non-human). Stiff sanctions, along with public education programs, should be instituted to discourage this serious misuse of ecologically sensitive areas. Dirt bike trails should be restricted to former strip mine and other waste areas, and as these areas recover and succeed the presence of even these trail should be reconsidered. One suggestion for a great location for dirt bike trails would be to place them in the back yards (quite sizeable, I'm sure) of the folks who manufacture and promote and market dirt bike usage. And the mentality of many dirt bike users is quite telling, I think: the comment of one enthusiast lobbying at a public hearing for more trails in an area in the California side of the Mojave Desert, when it was pointed out that there already many miles of trails in a designated area provided for ORVs, was, "But that place isn't pretty any more; we want a nice area to ride around in." The area wasn't "pretty" any more because so many of the ORVers don't stick to the trails and had so churned up the fragile soils and biotic community that it had become trashed. Unfortunately, the mentality of so many dirt bikers (and I would hope that responsible ORVers would readily acknowledge this) is consumptive in the sense that the noise, speed, erosion, destruction of vegetation, and other disturbances inherent in ORV use are actually what generate the feeling of pleasure in so many of the enthusiasts. This extension of our cultural predilection for domination of Man over Nature may, upon serious consideration, simply render ORV use incompatible with the successful ecological management of our public lands. The opportunity to use dirt bikes elsewhere is guaranteed and protected; protection of biodiversity and habitat health is not. These ecological uses must take precedence over other uses, which, if they are allowed at all, must be consistent with conservationist principles. We all appreciate Motron, but we also need to begin recognizing the dysfunctional ramification of its extremities. [625]

2.D.4. Cultural and Heritage Areas.

Factors leading to a need for change: Interpretation and education guidance about heritage resources needs to be updated to reflect a shift in emphasis in historic resources such as the iron furnaces and Underground Railroad. This education effort reflects an important emphasis area for the Forest and the Eastern Region. The Wayne is a partner in research of the Underground Railroad with the Hoosier and Shawnee National Forests, as well as many government and private organizations. The Wayne's efforts were recognized in 2001 with a Chief's Spirit Award.

Proposed Direction: Manage pre-historic and historic cultural resources, including preservation of sites associated with the Underground Railroad.

The WNF received only two responses during the public comment period that related directly to

the subject of Cultural and Heritage Areas.

Examples:

The Ohio Archaeological Council (the Council) is a private, non-profit corporation registered with the state of Ohio since 1975 as a charitable, scientific and educational corporation. We are a membership organization comprised of well over 100 individuals, most of whom are professional archaeologists working or have a research interest in Ohio archaeology. Our membership also includes a small number of a vocational archaeologists and five institutions engaged in archaeological research, interpretation, site preservation, and public education in Ohio. Our primary mission is to promote the advancement of archaeology in Ohio through research, publication and education.

The Council welcomes this opportunity to comment on the revision to the Wayne National Forest's (the Forest's) Land and Resource Management Plan (the Plan). In preparing our comments we reviewed information on the existing Plan contained on your website. We also attended the Forest's June 10, 2002 public meeting in Dublin, Ohio, though we did not submit oral testimony. At the June 10 public meeting, the Forest Plan Revision Team (the Team) expressed their desire to obtain comments pertaining to "issues, concerns and opportunities." We address concerns and opportunities for each issue raised below.

Issue: Developing goals and measurable objectives to reach such goals During the June 10 public meeting, the Team stated that the "management of prehistoric and historic cultural resources, especially the preservation of sites associated with the Underground Railroad, needs high profile in the Plan." We agree that the management of prehistoric and historic cultural resources should be a primary goal of the plan. We do not, however, have enough information to comment on whether sites associated with the Underground Railroad need to be given special attention. We are concerned that many of the measurable and worthy objectives in the current Plan do not appear to have been met. Given the Federal Government's current and likely near-future conservative political and fiscal climate, we recommend that conservative and measurable objectives be developed in order to assess the progress of meeting defined goals at the end of this Plan's life, some 10-15 years from now. We see the development of measurable objectives as an opportunity for the Forest, the U.S. Department of Agriculture, the U.S. Congress, and the public to measure the Forest's progress in reaching its goal of better management of its cultural resources. Another opportunity we see in this issue is for the Forest to develop a consulting relationship with the Council. The Council's mission includes assisting government agencies in archaeological matters. An opportunity exists to formalize such a relationship if the Forest chooses to do so.

Issue: Changing the Forest's emphasis to interpretation of, and education about, its heritage resources The Forest's document Assessment of the Need for Change to the Wayne National Forest Land and Resource Management Plan (April 2002) includes cultural and heritage areas under the section Recreation Management. It states that among the factors leading to a need for change is a shift in emphasis at the Forest and throughout the Eastern Region to "interpretation and education guidance about heritage resources...such as the iron furnaces and Underground Railroad." While this is a worthy goal, the Council is concerned that measurable objectives need to be developed so that progress toward that goal can be measured. Nevertheless, the Council feels that there is a more important goal for managing cultural resources on the Forest than changing its present focus from whatever it is now to interpretation and education. That goal is the development of a cultural resources

management plan (CRMP) for the Forest. Developing a CRMP for the Forest is an opportunity to set near- and long-range priorities for the identification, evaluation, protection, interpretation, and use of heritage resources in the Forest. The Forest should develop a CRMP based on the numerous examples of CRMPs for federal properties.

Issue: Development of a CRMP for the Forest Based on the principle that you can't efficiently manage what you don't know about, the Council strongly urges the Forest to develop a CRMP for the Forest. The Council feels this should be the primary goal related to cultural resources in the Forest during the life of the revised Plan. There are numerous examples of CRMP's for other National Forests, National Parks and other federal land areas that would serve as models for the Forest CRMP. The CRMP should include revising the cultural resource overview that was completed in 1978. Indeed, a revision of this overview is cited as a need in the existing Plan.

The existing Plan also indicates that "site evaluation and National Register nominations" was a goal. The existing Plan indicates that seven archaeological sites per year were to have been evaluated. The sites to be evaluated were to have been determined from a list that was to be reviewed and updated annually. A list of sites that met the National Register Criteria for Evaluation (the Criteria) was to be prepared and updated annually. The existing Plan has a goal of nominating two sites per year to the National Register of Historic Places. The Council believes that although these goals are worthwhile, they are unrealistic given the low priority, i.e., the lack of funds, for such efforts over the last decade. The Council believes that it is more important to develop historic contexts within which cultural resources can be efficiently evaluated and registered as part of the CRMP than to set goals for evaluating and nominating a certain number of sites annually. There are many examples of historic contexts that the Forest can use for its own purposes. The recently completed Underground Railroad in Ohio historic context is an example, though it lacks an archaeological component. The development of similar regional historic contexts for the major themes related to the Forest's heritage resources should be the second goal of the Forest's Plan with respect to cultural resources. The existing plan states, "an immediate need of the...Forest cultural resources program is the protection of identified sites from the adverse effects of natural decay and human vandalism." The Council believes that site protection should be prioritized based on whether a property meets the Criteria. Sites that meet the Criteria should be protected. Sites are evaluated within historic contexts, which should be developed as part of a CRMP. Therefore, completion of the CRMP and its accompanying historic contexts should be a higher priority than protecting sites that may not meet the Criteria.

The existing plan states, "two sites per year are scheduled to be given protective action. In addition, ongoing educational programs and monitoring schedules will be drawn up on an annual basis." As indicated above, the Council believes that protection should be prioritized based on whether a property meets the Criteria, not based on a certain number of sites.

The existing plan states, "also requiring maintenance are the artifacts and records relating to cultural resources." The Council suggests that if curation of such materials remains a problem, the Forest consider curating such materials at the Ohio Historical Society or Hopewell Culture National Historical Park, the latter another federal facility, both of which appear to meet the curation requirements of 36 CFR Part 79, Curation of Federally-Owned and Administered Archeological Collections. Developing such a relationship would be an opportunity for the Forest to work more closely with either of these

institutions on many aspects of the Forest's cultural resource program. Regarding cultural resource interpretation, the existing plan states, "the Forest Plan has scheduled one interpretive project per year." The Council believes that while interpretation of the Forest's heritage resources is important, they should be based on opportunity and need, reflecting priorities established in a CRMP. [331]

And one good thing, from your perspective it will probably be good, I would like to see further study done on the underground railroad from Newport, all of the way up through Monroe County, if that's all right with the people from Monroe County. I think that's a big tourist draw we can get into, and maybe in the next 10 to 15 years. [524]

2.E. Land Ownership

The USDA Forest Service began acquiring land in Southeast Ohio in 1935, at the invitation of the State of Ohio. The original purchase units were established to provide for the restoration of key watersheds that had been heavily impacted by farming and mineral extractive industries in the 1800s. Virtually all of the National Forest lands in Ohio were acquired from private individuals or corporations through purchases on a willing seller basis, dependent upon available funding. Occasionally the Forest has exchanged lands after conducting an analysis of the specific tracts of lands proposed, and making a finding that the resource or management values gained by the government were increased by agreeing to the exchange.

2.E.1. Meeting Future Needs/Quality of Life

Most respondents reminded the Forest Service they are the land stewards responsible for the present and future needs of all the American people. A significant number of comments pointed to the absence of a large public land base in Ohio, and the need to plan now for the use of future generations. A smaller number of comments were received that expressed concern about the impact of continued acquisition by the Forest Service on surrounding communities, especially their ability to continue to grow their tax base and support local school districts.

Examples:

I think we should set a goal in Ohio of quadrupling the amount of public land in Ohio. That way we won't have to be fighting each other for every little bit of state land, of public land that is open to the people.

Public land is a great democratic accomplishment. I think in order to defend public land, you have to go -- we have to go and start talking about something here.

For the past 30 years we have based our public policies on the belief that everybody, if they just go look out for number one, and be greedy, and just look out for number one, make as much money as you can, that through greed and through certain individualism, we will go and reach a social good.

Tell that to anyone, stockholders look what happened to them.

We have to resurrect a notion called the common good. The common good, not the individual greed, not what's in it for me, but to reap what is in it for us as a people. And public land is one of the great accomplishments of our country and we have to go and preserve it and expand it greatly. Quadruple the amount of public land in the State of Ohio in the next 10 years, quadruple it again, then we won't be fighting over the miserable scraps that we have. [569]

Ohio's the 47th state per capita in the nation in public land ownership, third from the bottom. All users and interest groups must realize that we need support from local communities around the forest, as well as state and federal legislators, if we desire additional land acquisition for the Wayne National Forest.

When local economic benefits are realized through management and use of the renewable forest resource, we will gain that support, provide more habitat, and recreation for all users of the forest.

The recent introduction of House Bill 441, which would have banned all further land acquisition for the Wayne, was introduced to maintain the local economies supported by timber products.

The continued use of court injunctions, or long-term plans, which prohibit wise use of sound timber management practices on the Wayne National Forest, will further solidify the opposition to any increase in the size of our national forest.

Do you care about others who make a living next to the forest? Are you willing to accept sound timber management harvesting practices that create diversity if it is the only way to gain support for more land acquisition? We must compromise to build the support, or there will never be another acre added to the Wayne. [545]

Increased land acquisition and acquisition of private oil and gas and other interests to improve forest health, biodiversity, and ecosystem management.

The number of private inholdings and the generally non-contiguous nature of federal ownership in the Wayne National Forest present a serious management problem. The existing plan must be revised and significantly expanded to address this situation. The Forest Service should enter an aggressive program of acquiring land from willing sellers to create a contiguous forest that can be adequately managed for biodiversity, species and habitat preservation, and other purposes. At a minimum, land purchases should be planned to provide corridors between already existing parcels of land to allow movement and migration of plant and animal species through and between such parcels. Special attention should be paid to protecting watersheds, inclusions, and areas that are potential habitat for endangered, threatened and sensitive species. [330]

I also believe that one of the major disappointments is the land ownership and acquisition program. That portion of our program is critical with the consolidation of the forest, but what is missing is the support of local communities, due to the economic results, PILT payments, and what commercial harvesting could add to the communities. I think that is an integral part, the major factor that makes acquisition a critical component is the lack of recreational lands in Ohio.

Ninety-five percent of the land in Ohio is privately owned, less than 5% available to public recreation, so acquisition at this point in time for our future generations is going to be mandatory if we expect them to enjoy the same opportunities that we do as the multi-use and conflicts of interest continue to go. [507]

Increasing land acquisition.

Establishing a moratorium on future road building and eliminating unnecessary roads. Given the paucity of publicly accessible, quality natural areas in Ohio, there is no excuse to manage the Wayne for anything but the preservation and restoration of intact ecosystems and passive recreation. This would be the best course for the citizens of the state, long-term economic vitality, and the integrity of ecological systems upon which all life depends. In saying this, I know I speak for hundreds of thousands of other Ohioans who now recreate in the Wayne, or who would do so if it improved. It is vital that the forest plan respond to this broad, public constituency. At the same time, we don't want to forget about the people of southeast Ohio who live in and around the forest. I realize that extractive industries -such as logging and mining -are a source of jobs and revenue for local governments and school

districts. So there is a local interest in maintaining the status quo of multiple uses in the forest. But I would not call those industries a source of long-term economic development. After more than 150 years of exploiting the natural resources of the region, what have these industries really done for that part of the state, besides giving it a depressed economy? So I would encourage the Forest Service and the state to have a different vision for southeast Ohio—a vision of economic renewal and sustainable development, a vision of how tourism and recreation-based industries can be more sustainable, provide better jobs, and can protect natural resources instead of degrading them. [378]

The rest of SE Ohio needs jobs as well. Many of the farmers are glad to have The Wayne available to sell their land to, since they can't make~ money farming anymore. I would like to see commercial logging stopped in The Wayne and more land purchased so that the forest is not so fragmented anymore. Tourists often wonder where the National Forest is; most parts of The Wayne are not forest at all. Wilderness areas could be created that would be suitable for hikers, campers, and nature lovers; this would bring in much-needed tourism dollars to this impoverished area. [196]

I think Wayne National Forest is a good thing, but I think somebody needs to decide to pay for Wayne National Forest if they want to have it in our counties.

Wayne National Forest owns almost 10% of Monroe County. They go in where there's not a lot of population, but there's a lot of forest where they -- it hasn't been cut down for economic development, so we're already kind of poor to begin with, and as more land acquisition that Wayne does, the more it hurts the local economy, and it hurts our schools.

One thing that the government -- the Federal Government needs to do is fully fund the PILT payments today. You know, every year they put it in the budget, and every year they cut it, and are getting -- 40% I think this year, but if they fully funded it, it would be a lot better than what it is right now.

Our school system just got released from fiscal emergency just in April. And that -- I mean, we have a lot of our own problems that we need to take care of. But the loss in tax revenue because of 24,000 acres owned by Wayne National Forest does not help our school system any. [525]

The Wayne National Forest must first prove that they are good neighbors in order for most of the owners of land within the boundaries of Washington County to agree that the purchase of land is all right.

Frontier Local School District is 104,000 acres, almost all of it within the Wayne National Forest. The Wayne National Forest now owns approximately 39,000 acres of district land, or 39%.

Our district receives a very small amount of money from the Wayne National Forest for the 39,000 acres. I was given a paper today; it says they are paying a little more. A payment of \$36,000.00 would be on the high end.

Each year we suffer from loss of land where people can come to live in the future, where the Wayne buys land and we loose, because students -- if you have land for students to live on, and be raised, and go to schools, their stealing amounts to about \$4200.00 each that we receive from governmental sources, other than the Wayne National Forest.

If only 10% of the currently held land in the Wayne National Forest was privately held, and families with one child for 50 acres, this would provide 78 more students, and approximately \$327,000.00 yearly. We want to retain the student enrollment numbers that we now have, and see that we grow in the future.

If the Wayne continues to grow, the school system will cease to exist, and the Wayne National Forest, and the out holders, the people away from here, will have won.

When the Wayne National Forest buys land, rarely, rarely is employment caused. You might provide recreation areas, but employment is not created to any great extent.

The Wayne National Forest seems, to our district, to be like a slow growing cancer. It's killing us every minute of the day or night, and the doctor currently says that the district is turning all yellow. Well, doctors, the cure is for the Wayne National Forest to quit land purchase until they can prove to us that they are truly good neighbors.

If the people of Washington County don't shape up and pay attention, before long the eastern half of Washington County is going to be Wayne National Forest, and the people that live in Marietta, and the western area, are going to be taxed more and more. It's going to be taxation without representation. [354]

2.E.2. Priorities for land acquisitions and exchanges.

Factors leading to a need for change: The combination of seller interest and funding availability has created a fragmented ownership pattern, with significant areas of private holdings remaining within the Proclamation Boundaries and interspersed with Forest Service holdings. National Forest ownership currently totals approximately 233,000 acres within the 833,990-acre Wayne National Forest Proclamation Boundary area. The number of smaller tracts also significantly increases the Forest's ownership boundary, currently at more than 1,980 miles.

The land acquisition program remains one of the most politically controversial activities on the Wayne. In 2000, legislation was introduced in the Ohio Legislature to revoke the state's consent for federal acquisition.

The land acquisition program (buying land from willing sellers) is the main way the Forest ownership pattern has changed since 1988. The land exchange program has historically been a very small program on the Forest.

Proposed Direction: Acquire and exchange land to increase contiguous Federal ownership and reduce the existing fragmented ownership pattern.

Several commentors expressed concerns about the natural characteristics of lands potentially selected to be exchanged away in return for other lands.

Example:

Land Ownership: The goal of creating continuous landownership is good, but it may not be in the best interest of the ecosystem to sell off or to degrade the isolated properties since these could very well be the best lands available for maintaining the gene pool needed for restoration. Care needs to be taken that no lands under current ownership be traded or sold without very careful consideration to the role they may be serving. In creating the islands and corridors, the Forest Service needs to coordinate with the other property owners in the purchase area, both public and private. It would be quite acceptable to have appropriately managed private lands be at the core of a protected island if the land owner were to enter

into a conservation easement or other appropriate protective program that would also protect the long term public investment in that natural area island. The Wayne Quarterly publication advertises that the Wayne NF's acquisition goals are for the purchase of lands in the 2.1, 6.1, 6.2 and 9.2 Management areas, yet when one looks at the 1987 Wayne Forest Plan maps, one finds very little land classified as any of these 4 areas. For example, the Marietta Unit has about a third of its area classified as 3.1 for clear cutting on 80 year rotations for hardwoods and 60 year rotations for pines and another third of the area classified as 3.3 for clear cutting on 120 year rotations. Also in the Marietta Unit, the 2.1 classification for river corridors needs to be expanded to watershed protection capability and the uneven-timber management classification dropped and the roaded recreation changed to road reduction management. . The above listed concerns were specific to the Marietta Unit, but can be adapted to the other Districts as well. In all areas where corridors are currently shown in the 2.1 areas these areas need to be buffered by at least 2.2 management areas of several times the width of the 2.1 areas on all sides and used to connect the 6.2 areas (natural forest - no timber harvest or wildlife openings to be created, recreation semi primitive, non motorized) which also need to be surrounded by a new category similar to 6.1 that would not include the current clear cutting of the 3.3 areas. . The 9.2 classification indicates that there is an interest in acquiring lands that could (.II become 8.1's (natural areas with no manipulations of vegetation), but it makes no sense to have these potential passive management areas surrounded by 3.3 area clear cuts. Any area that has been identified as a 9.2 area or an 8.1 should be presumed to be deserving of some sort of protection that a buffer area such as a 6.2 would create. Another area where the WNF 1987 Forest Plan map needs to be modified is in the 9.1 areas, that is those areas currently listed as available for land exchange. At minimum, this category should be modified to reflect that active purchases are not being sought, but given the right opportunity, purchases should be made. The current category that indicates a goal of trading off the land seems inappropriate or at least the boundary needs to be modified. In the Ironton District, the Timber Ridge Recreation Area was purchased in the Greasy Ridge area near existing Forest Service land since the plan was finalized. This purchase did not fit the 9.1 management criteria, yet it was the appropriate action to have been taken. The 9.1 management areas in the Athens district have not been modified since the plan was created, maybe instead of considering trading these areas, these isolated areas could most appropriately be managed using passive, no cost, management techniques, also known as allowing "mother nature to take her course." The results of this management should still be monitored for comparison purposes, but also to prevent timber or other resource theft of public owned property. The Athens district 1987 map, including the Marietta Unit showed the outline of a "North Country I Buckeye Trail Corridor" yet there is no sign of this trail on the current Wayne NF maps being sold to the public. The 1987 map showed no sign of an actual corridor for the trail thus showing a great disconnect with the planning process in this area. The new plan should review this concept and maybe design and implementation corridor. Another problem with the 1987 WNF map that needs to be modified is with a 3.2 area in the Athens District surrounding the Greendale wetland area. This 3.2 area designation is for an area to be used for ORV's and the heaviest logging in the forest plan, but in the middle of this designated to be highly impacted areas is one of the most unique "natural" features of the WNF, the wetland pond where the beavers, working with the remains of a railroad right-of-way and an existing road have created a very large beaver

pond, wetland habitat. This area is so unique that in 1997, it was proposed by the Forest Service to be designated as a watchable wildlife area. Unfortunately the current management in the surrounding area spoils the "watchability of wildlife" due to the noise and other human impacts. The ORV's illegal traffic in the area is frequent that it prevents the multi-flora rose from taking over the trail but the growl of the ORVs on the Dorr Run Trail is often louder than the bird calls in the wetland area. The wells on both ends of the wetland's trail are noticeable for their sight and odor and possible impact on the water. The proposed timber sale in the area certainly wouldn't have a positive impact on the "natural area B Also, of great importance in "watchable wildlife" is that the wildlife, especially the deer, are terrified of humans, since most of the humans they meet try to shoot them. No hunting regions need to be designated in the Wayne especially now that there is Sunday hunting there is no day when the visitor is safe from being shot in the Wayne NF. This area does have a relatively large land area in public, ownership and should be redesignated from the most abused category of 3.2 to at least 6.1. The other portion of this area deserving greater protection from human Impact is j~ the bog located across the street from the pond, in fact the whole creek valley is an excellent wildlife corridor capable of really enhancing the WNF watershed protection capability. [295]

2.E.3. Boundary Management

Factors leading to a need for change: The dispersed ownership pattern of the National Forest creates a large boundary line between federal and private lands. The Forest's actual boundary is currently more than 1,980 miles. If the current level of acreage was contiguous, the boundary would be less than 80 miles in length. This situation is complicated by the variety of survey techniques employed in Ohio from the 1700s forward. This largely unmarked boundary creates a potential for trespass by Forest visitors onto private lands and encroachment by adjacent landowners onto National Forest lands.

Proposed Direction: Manage National Forest boundaries to reduce trespass and encroachments.

Most people who responded on this subject lived adjacent to the Wayne National Forest and expressed concern about how the Forest Service could reduce trespass and share the cost of building fences. One commentor suggested building a fence around the entire perimeter of the National Forest.

Examples:

I am chairman of the Government Affairs Committee of the Ohio Farm Bureau Federation. The Ohio Farm Bureau Federation consists of 200 and -- a little over 214,000 members, families, and businesses, primarily farm businesses, and agriculturally related businesses.

And I would like to quote to you from our State and our National Policies that were -- that had been adopted by our delegates to address reprocess.

Wayne National Forest should maintain line fences with adjoining property owner's who are engaged in agricultural practices. [515]

In talking about boundaries, you were talking about the public trespass and stuff, me and my

dad's been there 40 years. I think Wayne National Forest has been there for probably 25, or probably 30 years, and we've yet to see the first dime for fence money.

We got a boundary of fence that runs the whole side of them. Anytime our cattle gets out, we have to go get the cows in, and we have to build a new fence, no money. So, I think if we're -- if Wayne National Forest is going to have property, they need to control the property, they need to work with their neighbors, and their concerns, and their needs, not just run over top of them, and in my opinion, that's what's happened with us. We have had no cooperation with them whatsoever.

I have had the ODR out there, nothing's happened, and I came -- this meeting just came up, so I thought I would come over here and make a public statement on the record here that we need help.

The neighbors of the Wayne National Forest need help in protecting their own property that's being destroyed by neglect from the Wayne National Forest people. That's my opinion. Because there could be control of the beavers, because on my property I don't have any beavers on my part of the property, because I took care of the beavers (inaudible). But if Wayne National Forest would have helped controlled the dams, it would be probably less flood control, and less flood problems.

We have more floods in the area where I'm at now, the water gets higher, the cattle cannot graze in the summer because there's no grass left, because it's all flooded and drowned out, and it stinks like you can't imagine. It's soured all of the time.

So, I hope they put in the guidelines and look at controlling and helping the neighbors of the adjoining properties next to Wayne. [619]

Fencing, we have asked for fencing of your Wayne National Forest land for years. We're told, well, we've got too many miles of fence and we can't do that. Well, start. When you're finished maybe you'll be a good neighbor. [354]

2.F. Minerals Resource Management

Oil, gas, and coalfields as well as industrial minerals such as sand, gravel, limestone, clay, shale and salt are found within the Wayne National Forest. The United States own the rights to about 33% of these minerals with the rest in private ownership. Federal laws and policies regulate the exploration and development of the minerals within the Wayne National Forest while being consistent with other resource needs. The 1988 *Forest Plan* recognizes oil and gas exploration and development as a suitable use of the Forest and determines that the entire federally owned oil and gas mineral estate is administratively available for leasing, although surface occupancy is prohibited in some management areas.

2.F.1. General Comments on Minerals Management:

Most comments received did not specifically address the proposed direction outlined in the Notice of Intent. A large number of comments expressed opposition to development of oil and gas extraction on the National Forest.

Examples:

Oil And Gas Leasing – The New Forest Service Addiction The 1988 Plan referred to the fact that there “may be” some oil and gas leasing during its term. In the last year, the Bush administration has dramatically stepped up oil and gas leasing activities on all federal lands where it is feasible. To help pay off Bush’s campaign contributors and friends in the oil and gas industries, the Forest Service, with the assistance of the BLM, has also stepped up oil and gas leasing on the Wayne N. F. In spite of the fact that Ohio produces only “dripper wells” (as opposed to “gushers”) that are only economical to operate when oil and gas prices are high, the Forest Service has started peppering the three units of the Wayne with leases and related oil and gas wells. This is further evidence that saving biodiversity was a low priority under the existing plan.

The BLM, which apparently handles such matters on the Wayne, reports a total of 8,121.89 acres of existing federal oil and gas leases on the Wayne, and an additional 12,333.54 acres of existing privately acquired oil and gas leases on the Wayne. Altogether, the Ironton Unit contains 2,545.56 acres or 12.5% of these oil and gas leased acres. The Athens Unit contains 6,694.95 acres or 32.7% of these leases; the Marietta Unit contains 11,214.95 acres or 54.8% of these leases. In terms of total wells with a right to exist, it was reported that the Marietta Unit has 890 wells while, upon information and belief (waiting to be confirmed), the Athens Unit has about 300 wells and the Ironton Unit less than 50 such wells.

Make no mistake about it; you can destroy a forest ecosystem by dotting it with hundreds or thousands of oil and gas wells with their related access roads. In the State of Pennsylvania, the greatest source of water pollution in the state are the 10,000 oil and gas wells on the Allegheny National Forest. That’s right; the greatest polluter in the state is, in reality, the U. S. Forest Service. The Allegheny National Forest is now listed by biologists as the most imperiled national forest in the country. Under the existing plan, the Forest Service apparently wants to replicate that history in Ohio. The people of Ohio don’t want this and the trivial amount of oil and gas involved is not worth sacrificing our state’s biodiversity. We have requested more information on extraction activities and royalties received, but are still awaiting a response from Wayne officials.

Since our previous requests orally and in writing (beginning in autumn of 2001) for more information on the number of oil and gas wells with a right to exist on the Ironton Unit and the Athens Unit have been ignored along with our requests for revenue information to the government from such activities and for similar data on sand and gravel mining, we now hereby make a Freedom of Information Act request for such information on all extraction activities on the Wayne N. F. by unit or by county (whichever is easier) from 1990 through 2001. This should include a breakdown of all the costs associated with such activities. In the meantime, our recommendation is that all extraction activities on the Wayne cease immediately, as it is incompatible with saving old-growth biodiversity and with creating wilderness habitat. At a minimum, it should at least cease on the Ironton and the Athens Units of the Wayne, which would still leave the Forest Service with the clear majority of its leases and oil & gas royalties. The best well fields are apparently on the Marietta Unit.

The oil and gas royalties insure to the benefit of the Department of Agriculture and the Forest Service, but are harmful to the Nation and to Ohio when all socio-economic factors are properly weighed as in the attached "The Economic Case." The new roads will add sediment to the local streams, cause erosion, encourage invasion by exotic species, fragment the forest, and destroy a significant amount of forest habitat. The oil and gas wells will pollute, reduce the eco-tourism value of large areas of the Wayne, make a lot of noise, and are usually abandoned to be cleaned up and to be remediated at taxpayers' expense. Whatever trivial amount of oil and gas exists underneath the Wayne N. F., it makes more sense to save it as a strategic reserve for the Nation for any future period of emergency or scarcity when such commodities could possibly be worth the tremendous ecological and tourism damage which they will inevitably cause. [368]

Areas that are proposed for wilderness designation must be immediately placed completely off limits to any type of extractive activity, including mining, oil and gas drilling, and timber harvest. Motorized vehicles should also be prohibited. If any extractive activities are to be allowed in the national forest, buffer zones of at least 2000 feet in width should be established around the wilderness preserves that permit only minor, selective harvest techniques in an effort to preserve the biological and ecological integrity of the wilderness habitat.

Increased land acquisition and acquisition of private oil and gas and other interests to improve forest health, biodiversity, and ecosystem management.

The location of private mineral and oil and gas rights on the national forests remains a mystery to most citizen users, threatens the integrity of the forest resource, and leads to difficult management situations. The revised Forest Plan should include a detailed inventory and maps of all mineral and oil and gas rights not owned by the federal government. This inventory should be used to plan an aggressive effort to acquire such rights throughout the life of the revised plan. [332]

The NOI states under Proposed Action 5, Minerals Resource Management:

Identify areas appropriate for leasing of federally held oil and gas rights consistent with national direction.

National direction can be interpreted to mean governmental direction. It appears by this definition that the Forest Service is circumventing the power of public comment and opinion in the proposed action—instead reverting to governmental direction. Also, by stating that oil and gas leasing are subject to "national direction" in the proposed action, instead of

providing specific goals and objectives to guide the agency, the action affectively allows the Forest Service dictate policy on the fly without significant forethought or analysis. The afore mentioned issues regarding fragmentation, road building, threatened and endangered native species, and inventory and monitoring also apply to oil and gas development. Further concerns are the potential for environmental contamination from oil and gas drilling and storage. Much like logging on private land, private property constitutes the majority of oil and gas development in Ohio. The highest and best use of the Wayne National Forest is for preservation of native threatened and endangered species, and high quality primitive recreation, not oil and gas drilling. The Long-term study of environmental impacts from currently leased and existing private wells, along with the purchasing of existing rights, should be the focus of the Forest Service's attention. Oil and gas development should not occur on the limited acres of the Wayne National Forest. We request that the Forest Service provide an alternative to the Wayne Plan revision that does not allow the leasing of federally held oil and gas rights. [351]

It should be the goal of the public lands to not compete with the private landowners on price. Mineral resources need to be viewed as non-renewable and the price needs to be high enough to encourage reduces waste and increased efficiency. The management of the public resources needs to be towards the long term, since it is likely that the private landowners will be looking at their own short term profits. Besides price the public resource management needs to be looking towards the need to have future supplies, especially petroleum since this raw material has many uses including the manufacture of plastics and medicines. Public lands are the best place to conserve Our natural resource\$ so that future generations have them when needed. It is the current national policy for the public lands to supply the cheap raw material for II industry and this is being accomplished by helping to hold down the price. This policy is outdated due to the wording of the many trade agreements the U.S. is involved with, especially the General Agreement on Tariffs and Trade. GATT makes it illegal to reserve resources for domestic consumption except through their not being exploited at all. The national direction could change over the life of this current plan revision. It would be easier to allow more exploitation of the natural resources at some future time than to buy back leased options. It would be best to have the Wayne NF Plan be geared to allow as little contracting out of the sale and or exploitation of the mineral resources as possible. Another issues regarding mineral resources, and other resources and their impact on the local economy would be to look at the prosperity of those living near the eastern national forests and those living further away. It is obvious that the purchase of the ' national forest lands has not improved the economic fortunes of the locals as much as could be expected by now and this could very well be due to their having to compete with the public lands when these locals try to sell the same raw materials available from the public lands. Since only about three-quarters of the purchase area is owned by the Wayne on average, it would be best to allow that private three-quarters to be the "profit making lands." [294]

The risks involved in extracting oil, gas and minerals in the National Forests simply do not out weigh the benefits. There are plenty of other places to extract oil, gas and minerals besides our last remaining wilderness areas. The fact that the National Forest system charges by far the lowest fees for extraction, less than private property, simply makes it more

profitable for the Oil, gas and mining special interests. This encourages extraction not discourages it. Because this enhances profitability, the National Forests and wilderness areas and our recreational areas are simply being endangered for corporate greed. There are other places to get oil, gas and mining products. Oil, gas and mining should be eliminated completely. It is not a question of "if" these activities will pollute the National Forest. They already have. The water is unsafe for drinking making it largely unfit for overnight back packing any where in the forest because of industrial activity. It is useless because you cannot replenish water, which is necessary to survival. So it cannot be doing anything for the wild life either. It is in fact contaminated already because of these activities. It should be done in less sensitive areas. [356]

Reasons given by some members of the public to continue oil and gas development included the nation's need for energy, particularly clean-burning natural gas, and the importance of energy sources to the American economy.

Examples:

On September 11th, 2001, the United States was attacked by radical Islamists who would destroy our liberty, and even require the virtual enslavement of women. The source of their power is control over oil.

Therefore, oil and gas drilling is essential in the Wayne National Forest and should be encouraged and allowed. Any oil which is developed, reduces our dependence on foreign oil, and, therefore, reduces the power of those enemies who would destroy us.

Furthermore, there is no reason why national forest land should not be made available, since only a small portion of it, a few hundred acres in the whole area, for nuke plant construction, which would also eliminate dependence on foreign oil, and nuclear power produces no carbon dioxide.

We have -- furthermore, this should be one of the most important considerations, because I've heard a lot of people who want to stop oil and gas drilling, but oil and gas drilling can be done without doing great damage to the environment, but it is essential to our national security, and to our way of life. [480]

Natural gas is fast becoming the energy of choice for, not only space heat, but especially electric generation.

I had the privilege of touring the new generating facility at Beverly that just came on-line this week, and in that facility they did their test runs on consumption.

They burned 78,000 -- well, in cubic feet 78,000,000 cubic feet a day at that facility, which, to put that into perspective in the State of Ohio that's somewhere between a third and a half of the estimated recoverable reserves per well drilled in Ohio.

Granted, there are better wells than that, but in Ohio the average well would run that plant for two days, so we need access. In North America, if we're going to use natural gas, the cleanest -- I call it the platinum fuel, it's the cleanest thing we can burn to do all of the things that we want to do.

We pretty well -- with new regulation and concerns, things like AP buying the town of Cheshire, you know, from their coal plant down there, we've boxed ourselves into a corner on what available fuels we have to meet everyone's expectations on emissions, and natural gas

does that for us.

So we would like to see development -- every area of the Wayne borders on -- like Danny said, for 100 years oil and gas producing areas in Southeastern Ohio, and these are areas -- I represent the Southeastern Ohio Oil & Gas Association -- and it's like Danny said, these are all small independent producers. We are not big oil.

We develop resources with local help, and local services, and it's a vital part -- the United States is fast on a track right now of consuming thirty trillion cubic feet a year, we're currently at 22, and most of this -- a lot of this increased demand is electric generation.

So if we want natural gas to have -- to have clean sources of electricity, which I don't think anyone in this room wants to do without, we need to continue to develop the natural gas and oil areas of the Wayne. [611]

A number of comments supported continued oil and gas development because of the significant role minerals play in the local economy. A few comments noted that oil and gas extraction was one of the first industries in Southeast Ohio and that it reflects the region's heritage.

The Ohio industry in the areas of the Wayne National Forest, the counties that exist underneath the forest, represent one of the oldest oil and gas producing provinces in North America, probably bar none. And today, yet, this region remains a very viable oil and gas producing region, significant natural gas production, and crude oil.

This natural gas production flows into local distribution systems in Southeastern Ohio, and helps to mitigate price volatility, as compared to other areas where you see very fastly spiking prices during that peak demand. That's of a value to the local community, and that value is enhanced by having natural gas production right by the pipeline.

We've been told that there have been comments that people that operate oil and gas in the areas of the Wayne are usually not connected to this community of Southeastern Ohio. That is wrong.

If you go back and you look at the drilling permits issued just, for instance, over the last three years in this area, you will find that 94% of the wells drilled, were drilled by people in Ohio, from Ohio, and live in these communities. So, that is a benefit, an economic benefit to people that live in the area of the Wayne. [304]

My concern, as stated, is the oil and gas and the involvement of how we can cooperate, and how you will cooperate, meaning the national forest, cooperate with us on forestland.

I'm here to express my importance to not only the financial side of it, but on the heritage side of it, because the oil and gas industry has been in this community way back farther than any of this national forestry.

I personally own wells that were built in the late 1800's. There are state laws to protect private landowners, and those same laws apply to the forestland, the government land.

It will make it to where if your worried about us being abusive, or offense to anything in your forest, there's already protection that's been stipulated.

I have informed -- been informed earlier here that there's a group of people within the organization that has to do with minerals, and it gives me a contact point, and I do much appreciate that.

As it is right now for myself and other people, there's a strong stigma, which makes us want to hold back on investing any of our further money into what could be done on the government property.

Concern is, if you folks would all want to say, we can't do this, can't do that, our investment would be gone. I know that we're developing waterways, and they are beautiful, that's a lot of why I still live in this community.

There's concern with having to abandon wells that are close to waterways. And it is my feeling, I don't know the feelings of others, but if there would be stipulations put for any further wells, that would be one thing, but to actually have us remove wells that we have in existence is a whole other matter, and there is much concern on that.

And this clock is going to run out, but I just want to let you folks know, the wells have been here for a long time; they are a part of our heritage. They're a part of what is around here as much as any rock formation out on the hillside. There is ways that oil and gas, these minerals can be harvested that would both benefit the private sector, and the national forest, and we don't want to be left out. [513]

Not everyone agreed that the economic benefits of minerals extraction outweigh the potentially negative environmental impacts.

I'm a geologist. I'm a professional geologist, and have been for many years, and I helped found, and wrote some of the laws for the State of Texas, called the Damage Assessment and Restoration Program.

The reason I'm saying that is, I have a very, very strong opposition to any of the federal leases for oil and gas on our national forest lands. The reason is -- one of the reasons, besides the fact of it being intrusive, is that I understand it all dates back to either the early 1900's, or late 1800's, when there's a mining -- some kind of a mining act, or something, that allowed that to occur.

I was working on some of that fight about five or six years ago trying to get that rewritten, because it was understood to be a mistake, and that it should have been rewritten a long time ago.

And so what I would like to see in this plan, is that there is some kind of economic justification to show how this benefits the public to have federal leases of the oil and gas, or other mineral rights on that land.

Who does it benefit, and economically how does it benefit? Because to my knowledge, it is nowhere near the value of the resources we're giving up, and providing it to other industries who come in and mine, whatever kind of mineral resources. [485]

2.F.2. Development of privately held mineral rights.

Factors leading to a need for change: Because more than 60 percent of the mineral rights beneath the National Forest remain in private hands, the Wayne must provide access to those individuals and corporations who choose to exercise their valid rights.

Proposed Direction: Minimize adverse environmental impacts to National Forest resources when private mineral rights are developed.

No response was received that directly addressed the issue of private mineral development; however, a number of commenter asked that the WNF begin to acquire privately held minerals in order to control or prevent future development.

Example:

Other provisions in the new plan should include, for example, the purchasing of outstanding mineral rights. This is the only guarantee that the ravages of mining and drilling won't destroy essential components of the forest. [139]

2.F.3. Consent to lease federally held mineral rights.

Factors leading to a need for change: Both the Bureau of Land Management (BLM) and the Forest Service administer oil and gas leasing on behalf of the Secretary of the Interior and the Secretary of Agriculture, respectively. The Forest Service and the BLM have joint responsibilities and decision-making for management of the minerals resource. This presents both agencies with a challenge with regards to coordination and timing in the course of processing applications for minerals development. Currently, the decision-making process for oil and gas leasing (outlined in Amendment 8 of the *Forest Plan*) involves three steps. Other National Forests have adopted a two-step process, where the decision of which areas to consent to lease is made in the forest plan, rather than in a subsequent NEPA decision.

Proposed Direction: Identify areas appropriate for leasing of federally held oil and gas rights consistent with national direction.

We received several comments on the proposed direction. Some comments agreed that the WNF should continue to identify areas appropriate for minerals development and also improve or replace the current lease process. Some commentators stated that federally held oil and gas rights should not be developed.

Examples:

The Wayne needs to expedite its method for selecting, nominating and approving various tracts that have potential for oil and gas leasing through the BLM. In the Allegheny National Forest (ANF) in Pennsylvania, I am familiar with a tract that was nominated for leasing in Jan 2001. ANF conducted the necessary studies and gave its approval to the BLM. The sale for this lease took place in October 2001. This fast action for an income-generating lease (to the U.S.) is unheard of on the Wayne. The appropriate people managing the Wayne need to contact their counterparts on the ANF and other areas to see how they can speed up the process to become compliant with the government's policy of developing oil and gas resources where available.

The process of enabling a BLM lease owner to develop a specific well site once a lease is issued needs to be expedited so the current delays do not require that the well be drilled during unfavorable winter or spring periods. In several cases it appears that it took almost 12 months to get approval from various government agencies (WNF and BLM) before operations from drilling a well could be started. [334]

*We read a report this week that was issued just this month by the Forest Service called *Process Predicament*, in which the Forest Service blamed major aspects of regulatory administrative frameworks and I'm repeating nearly every aspect of multiple-use*

management. So, I think this comes at a great time for you folks, and we hope that you take that into account.

We would also like to point out that in Executive Order 13212, the President of the United States asked all federal agencies to implement policies that would allow for energy related development to move forward and be expedited. We hope that that's considered as you move forward with this revision.[304]

The drilling and producing of Crude Oil and Natural Gas has been for well over 100 years and remains a very vital part of Southeastern Ohio culture. The resources produced is very important to Ohio State Energy needs while providing jobs for many in the region.

The 1988 Wayne National Forest plan realized the importance of Oil and Gas Resources development on the Wayne. However, my opinion is that the 1988 plan is very vague in outlining the procedures for leasing and approving drilling permits for individual tracts on the Wayne. As a result leasing Federal acreage takes years, and following the leasing process an operator spends another year obtaining a permit to drill.

Congress in 1987 under the 1987 lease reform act, enacted law stating that all Government Land Managing Agencies would post available mineral resources for competitive lease sale each calendar quarter. The 1988 Wayne plan does not give line officers and field staff guidelines or directions to follow in leasing single unit acreage.

Congress currently realizes that resources available to individual forest to carry out leasing projects in a timely fashion is a problem. Under HR 4 currently being debated in Washington both the House of Representatives and the Senate have made money allowances to expedite the function of Oil and Gas leasing and development.

I would suggest to the plan revision team the following. 1. That guidelines be established for conducting NEPA analysis as acreage is nominated rather than wait until an undetermined amount of acreage has been nominated.

2. That as individual tracts clear the NEPA analysis they be immediately released to the BLM in order to be placed on the next quarterly lease sale.

3. That Forest service personal not be required to look for acreage to lease, but to respond in a more timely fashion to acreage nominated for competitive lease.

4. The plan should be revised to address the common needs for Oil and Gas development. The particulars for individual's tracts could be addressed when nominated.

5. There should be put in place an Oil and Gas advisory council made up of both Forest personal and Area producers. The purpose of the advisory council would be to keep the Forest Management updated on changes in the local Oil and Gas industry as they affect the forest. [286]

Moratorium on Oil and Gas Leasing

Oil and gas leasing of federally-owned mineral rights and certain other discretionary extraction activities are inconsistent with ideas being suggested herein such as no commercial logging, road decommissioning, stream cleanups, creation of wilderness areas, and preventing invasions by exotic species. Oil and gas leasing should be prohibited in the revised plan. Further, an immediate moratorium on future leasing of federal oil, gas, and mineral rights is warranted, as these types of decisions, especially made in the absence of a long term plan may cause irreparable harm to the forest resource, wildlife habit, and user groups. If the Forest Service continues with such extraction plans under the 1988 Plan, a

plan that has been severely criticized by federal judges, before adopting a new long-term Management Plan, the agency will have effectively nullified in advance the purposes and intent of the Forest Plan revision process and the associated public comment period. [332]

2.G. Roadless Area Inventory and Evaluation; Wilderness Recommendation; and Wild and Scenic River Recommendations:

All three of these items were evaluated during the development of the current *Forest Plan*. No areas on the Forest were found to meet roadless or wilderness definitions. The Wayne National Forest has acquired over 50,000 acres since that evaluation was completed.

2.G.1. Roadless Area Inventory and Evaluation

Factors leading to a need for change: Forest Service planning regulations on roadless and wilderness recognize that National Forest System lands in the eastern United States have been acquired over time from private ownership. For the Forest Service to recommend an area for wilderness, it must first qualify as a roadless area. Criteria for identifying roadless areas in the East recognize that much, if not all of the land, shows some signs of human activity and modification even though they have shown high recuperative capabilities. Forest Service planning regulations require that during the development, or revision, of a forest plan the roadless character of the land be evaluated.

The additional acres that the Wayne National Forest has acquired since 1988 have not been evaluated for their potential to contribute to some area of the Forest achieving roadless or wilderness character. Without completing the roadless area analysis at this point, it is premature to rule out whether any areas might be recommended for wilderness.

Proposed Direction: Protect the wilderness characteristics of those areas identified for potential wilderness designation.

Comments: A large number of respondents indicated a strong interest in seeing the Wayne identify an area with the potential to be designated as a wilderness area and begin to manage for that purpose. This suggestion was often linked with the observation that Ohio lacks large areas of public land and there are few areas within the state that offer the wilderness experience.

Examples:

Roadless Area Inventory and Evaluation: Wilderness Recommendation: and Wild and Scenic River Recommendations: As much land as if feasible should be evaluated for this potential. There is no downside to setting land aside for non commercial exploitation since if it become necessary to log or mine later the value of the raw materials are likely to rise in time not fall. Wild lands can be considered as "money in the bank" so as much land as possible should be evaluated for road less and wilderness type consideration- Of course the eastern lands available for such designation are much less vast than in the west, so smaller areas need to be considered as well. [295]

We would like to urge the Forest Service to consider areas in the Wayne National Forest for recommendation to Congress as Wilderness Areas. There are currently no areas designated as wilderness on the Wayne. These types of environments are critical in providing habitat for threatened and endangered species. Species that need to be specifically dealt with in the plan are not only those listed by the Federal Government, but also those listed by the State of Ohio, as the Wayne is a significant part of Ohio's landscape. A particular future condition of the forest land that is not addressed by the current plan, lacks standards, and which has no established guidelines for Ohio's environment, is old-growth. The Forest

Service needs to include old-growth in the new plan and provide for research to establish what Ohio old-growth should be. Lastly, we want the plan to include a moratorium on road building, elimination of unnecessary roads, and stricter rules for granting easements across National Forest Lands, especially since these types of intrusions into the forest encourage distributions of invasive species. [274]

Increase wilderness-like natural forest areas At least one large, significant, and contiguous unit of the forest in each of the Wayne National Forest districts must be managed in a wilderness condition and groomed for adoption into the Wilderness Preservation system. This will help to adequately preserve and restore the biological integrity of the forest, develop habitat for existing and future species, and promote primitive types of recreation. [1,2-7,9,11-15, 16-79,81-95,98-99,111-118,121-125,143-147,151-156,159-167,182-188,208,213,235-243,248-254,282,384,388,389,394,395,397]

We also want some significant wilderness areas. Our concern is that the Forest Service will assume that we are referring to just a few thousand acres of wilderness. What we're really talking about is what westerners refer to as Big W, or Big Wilderness. Only large areas in excess of 50,000 acres will enable us to bring back species, like Black Bear, Elk, Bison, and Bob cats. These species are important because they are the magnets for tourists, which will drive the local economy. Studies have shown that the local economies benefit economically far more from tourism than the logging, or the oil and gas royalties. In 1999 the oil and gas royalties to the state, from the counties, from the Wayne National Forest, the entire Wayne National Forest, was only a little over \$14,000.00. In fact, even-aged timber plantations and oil barracks actually drive away the tourists. If you don't think so, ask yourself whether you would want to go camping, hunting, or hiking in those kind of areas. Ninety-five percent of Ohio's timber comes from private lands already, and the Wayne National Forest makes up less than two-and-a-half percent of Ohio's forested acreage. It is worth far more to Ohioans, and the local folks, for recreation, tourism, and forest interior species, which have been declining for many years in Ohio. Hunters would gladly pay very nice fees, and come from all over the east in the country to be able to shoot an elk here. Our responsible program would be good for the wildlife and good for the economy. We ask the Forest Service to comply with the federal laws that require them to look at the long-term social economic best use of the Wayne National Forest for the Nation and for the local economy. [425]

Establishment of at least one area that will managed as wilderness and proposed for wilderness designation pursuant to the Wilderness Act of 1964. As discussed above, the existing Wayne National Forest Management Plan protects less than 10% of the forest from extractive activities, while nearly 85% of the forest is subject to timber harvest and 60% is managed using even-aged techniques. Of all the states that contain land controlled by the United States Forest Service, Ohio is one of only two states that does not contain a designated national forest wilderness area.

While many private and state owned lands continue to be dedicated to timber harvesting purposes, the Wayne National Forest continues to be one of the few areas in Ohio where large units of forested land can be devoted to protecting forest habitat and promoting primitive recreation. To adequately preserve and restore the biological integrity of the

forest, develop habitat for existing and future species, and promote primitive types of recreation, it is imperative that at least one large, significant, and contiguous unit of the forest in each of the Wayne National Forest districts be managed in a wilderness condition and groomed for adoption into the Wilderness Preservation System.

Because the preservation of biodiversity is a major goal in designating wilderness areas in the Wayne National Forest, the size of the potential designations should not be limited by the 1000 acre figure designated as the minimum size for wilderness areas under the Eastern Wilderness Areas Act. The Ironton and Athens districts contain areas that are particularly worthy of wilderness designation that would allow ample habitat for the reintroduction of black bear and other species as well as excellent recreation opportunities. A designation in each of the three districts that exceeds 5,000 acres in size is desirable and not unreasonable. Areas that are proposed for wilderness designation must be immediately placed completely off limits to any type of extractive activity, including mining, oil and gas drilling, and timber harvest. Motorized vehicles should also be prohibited. If any extractive activities are to be allowed in the national forest, buffer zones of at least 2000 feet in width should be established around the wilderness preserves that permit only minor, selective harvest techniques in an effort to preserve the biological and ecological integrity of the wilderness habitat. [330]

The previously mentioned issues regarding fragmentation also apply to roads. All non-essential roads should be eliminated from the Wayne National Forest. As stated above, these roads contribute to the fragmented nature of the forest and inhibit species that require mature closed canopy forest ecosystems. Roads are vectors that are used by ORV's to trespass onto public land and they are biological routes used by non-native invasive and exotic species to colonize interior forests. Additionally, considering that the majority of forest fires are started by humans, these roads pose a serious fire risk. [351]

Other members of the public have expressed opposition to any wilderness recommendation.

Examples:

We need to resume controlled-planned timber harvesting in the Wayne. This timber harvesting should be done in a way to protect unique or endangered animals and habitats; ie den sites for rattlesnakes, riparian zones, etc, but also provide maximum economic benefit and plant successional diversity. The Wayne is not and should not be a Wilderness area. It was established as a timber resource, for recreation, erosion control and to improve the economy in Appalachia. [134]

Our national forest belongs not only to the small number of hearty souls who would enjoy backpacking into so called wilderness areas, but the forest also belongs to people like me and my five grandsons. The so-called "mostly abandoned dirt roads" that Mr. [Commenter] referred to are for the most part township roads, which are not abandoned. I urge you to return to reality by practicing judicious logging activities, and please, keep access roads open. [257]

2.G.2. Wild and Scenic River Recommendation

Factors leading to a need for change: New information on watershed conditions has been collected

through detailed ecological analyses of a couple of watersheds since the current *Forest Plan* was approved. The Wild and Scenic River analysis completed during the development of the current *Forest Plan* has not been reviewed in light of the new information, or with the new lands acquired since 1988.

Proposed Direction: Protect rivers eligible for inclusion in the national Wild and Scenic Rivers system.

The content analysis discovered only one comment that specifically addressed the issue of Wild and Scenic River Designation. That commentor opposed such action.

Example:

*Recommendations to Congress on Wilderness or Wild and Scenic River designation.
I do not support either. Continue to manage the Wayne National Forest for the benefit of the public by continuing to allow recreation and sporting activities (trapping, hunting and fishing). [314]*

2.H. Public suggestions for Revision Topics not covered by the Notice of Intent.

A thorough review of the 566 comments identified only two subjects raised through the public scoping process that were not identified as subjects for discussion in the Plan Revision Process, either as one of the six questions required by law or as a Revision Topic.

Three comments asked that the WNF make explicit in the Forest Land and Resource Management Plan the availability of National Forest lands for authorized use by the Armed Forces of the United States for a range of unit and individual readiness training exercises.

Example:

I request that you consider Ohio Army National Guard (OHARNG) military training activity in the revised Wayne National Forest Land and Resource Management Plan; and that the Regional Forester consider this a request to enter into any supplemental use authorization or supplemental agreement for use of the Wayne National Forest as needed.

I make these requests under the Master Agreement Between Department of Defense and Department of Agriculture Concerning Use of National Forest System Lands for Military Activity dated September 30, 1988 on behalf of the OHARNG.

When they conduct Inactive Duty Training (IDT) on weekends, our soldiers are not paid for their travel expenses and they are compensated only for four-hour blocks of time known as Unit Training Assemblies, or UTAs. It's therefore important to try to train our soldiers as close to their homes and units as possible, since valuable training time is lost to transporting vehicles and equipment from an armory to a training area.

The nearest OHARNG training areas to the Wayne are in McConnelsville, Tarlton and at Camp Sheridan at Chillicothe. None of these training areas offers the training potential that is offered by the Wayne, so as a practical matter, suitable Department of Defense (DoD)-administered land is not available. Under the Master Agreement, we can further explain, if you wish, why DoD-administered land is unavailable. The OHARNG invites you or your designated representative to participate in conceptual planning of OHARNG training activity in the Wayne and will provide an unclassified description of proposed training activity for your use in meeting the requirements of the National Environmental Policy Act.

I would be happy to designate a representative to liaise with your office and formulate any needed supplemental agreements or special use authorizations, if that is your wish. Within the limits of available funds, we can discuss any needed cost reimbursements. We are certainly willing to make every effort to avoid degradation of the forest, to mitigate adverse impacts of our use and to explore any reasonable proposal by the Forest Service to facilitate our use of the Wayne consistent with its Forest Plan. [1A]

A few people who commented pointed out that by educating the public about what forest management is and what it does would be a good way to get people engaged in the Plan Revision process. They recommended a range of educational programs and opportunities.

Examples:

And I would also like to see something in the plan about the legitimacy about the forest

engaging in educational activities. This did not occur before, and it led to anger. I don't see any reason to keep being angry, let's dissipate it. [458]

I'm a professional forester and a conservationist. The Wayne National Forest should be an example to the public how a managed forest can provide a variety of uses and opportunities. The Wayne National Forest should be used as an educational tool to help the public understand how important our forests are, and the money benefits, tangible, and intangible, a managed forest can provide. The management of the Wayne National Forest should include timber harvesting as one of the uses. [500]

Since the federal forest was established to be a timber resource, the item that is missing in the plan is in the early and the experimental forest, and demonstration watch. As visitors walk along a hiking trail, they should be able to view signed plots that demonstrates shelter wood cuts, select cuts, crop tree release, clear-cuts, group selection, et cetera. Performance of any cutting -- I'd like to snap a picture of a clear-cut area, just as the logger was leaving with the last load. The visitors should be allowed to view the same area some five or ten years later, where the new-growth trees filled the area. Woodland owners could preview what the woods would look like with that particular cut. Let's keep the forest what they were originally intended, a source of lumber and clean water. Let's add demonstration plots to show what a harvest looks like. A forest is for woods; a park is for recreation. [501]

Public lands should support research and educational outreach to all citizens of the region, and the country. In particular, it is appropriate to develop appropriate harvesting techniques to improve the management of private lands, and the development of these should occur on public lands, as well as on the private lands. Public lands, finally, should showcase best practices, and educate the public as to the interaction of humanity with the environment, and vice-versa. Best practices are not always the default position of doing nothing, but a creative and pragmatic approach to problem solving. Doing nothing, shows nothing, and accomplishes nothing. [505]

Finally, I would like to mention that the Audubon Society is pleased to work with the Forest Service on expanding environmental education opportunities, through the Resource Management Plan on the Wayne. It is one of our chief goals to work and partner with others to provide hands-on interactive environmental education experiences to help produce a culture of conservation in this state, and we're glad to explore those with you, particularly the opportunities to create new nature education and associated facilities on the Wayne. [478]

To me, the Wayne National Forest should provide services to the entire Southeastern part of Ohio, and the adjoining parts of West Virginia and Kentucky. And there are a number of areas where I feel that they should cooperate with other agencies in providing educational and research opportunities. In the area of forestry, for instance, we need some help in how can private owners -- and 95% of Southeastern Ohio is privately owned -- how can private owners afford to grow forest on expensive land. My father bought 320 acres of Coshocton County land in the late thirties, and he paid not over \$35.00 an acre for any of it. Fifty years later we sold that land for \$500.00 an acre. By the year 2000, land in Coshocton and

Tuscarawas is bringing as high as \$7,000.00 an acre. How can you grow forest on land that is that expensive with the present technology and things that we have? I think it's very doubtful that you can. So we need help, as foresters, consulting that problem so that we can keep Southeastern Ohio -- Southeastern Ohio forested. Also, the general public needs to have a lot of information about forestry. I don't think that the general public understands, for instance, the lifecycle of a tree. A lot of times we want to talk about trees in terms of 100, 200, 300, or 400-year's-old. I'm not quite 100, but the biggest tree that I've ever been around when they cut was a black oak, it was five feet in diameter, it was 150-year's-old, and the butt log was totally consumed by dry rot. But the facts are that most native Ohio trees have about the same life expectancy as a man, and I don't believe that the general public really understands this. [574]

I'd like to see more culture added, as well as interpretive services in media access, and perhaps an environmental history project of the Anthony Wayne might highlight those areas, and help those of us that are activists to remember, you know, what's happened in this area over the last 200 years.

In the area that the state's growing, over the next 100 years we may not have anyplace where we can go to be alone. There is still a united remnant band of Shawnee that are state recognized here in Ohio. There are other people that also fast in the Spring and the Fall. When the -- when the buds are as -- or the leaves are as big as your thumbnail, or a beaver's ear, people go out in the Spring, and it's usually for four days, over 30 days, you know, people rotate. There are Buddhists, Christians, Islam, New Age, Existential Meditation, if you want your own Walden forest or pond, that would be a nice thing to have, to think about over the next 50 years.

In tying in with that, I would also like to see us to be able to have a program where you could do off-trail orienteering, and backpacking, and make sure that that's maintained for those of us that may not want to be eaten by bears, and this is a great forest to do that kind of thing. [581]

Wayne National Forest is of paramount importance to the struggling economy of Southeastern Ohio. Policy change does not necessitate the loss of jobs. As stated in the Forest and Range Land Renewable Resources Planning Act of 1974: "Recycled timber products are as much a part of their renewable forest resources as are the trees from which they originally came, and in order to extend their timber, and timber fiber resources, and reduce pressure for timber production from federal lands, the Forest Service should expand its research in the use of recycled and waste timber product materials, develop techniques for the substitution of these secondary materials from primary materials, and promote and encourage the use of recycled timber product materials." It's time to start thinking outside of the forest. I would like to see a day when the Forest Service researches and implements a recycling campaign in the rural communities, as well as in the cities and suburbs, and everywhere else that timber products eventually end up. Who better to spearhead a timber recycling program than the U.S. Forest Service itself, which was created to protect our timber resources. [548]

2.I. Public suggestions for Revision Topics not covered by the Notice of Intent.

Some of the commentors made suggestions concerning need for change in the *Forest Plan* that will not be addressed during *Forest Plan* revision. In nearly all cases, the reasons those suggestions are not being addressed is due to the application of the evaluation criteria discussed above in the Introduction. Some of the more common reasons are:

- Suggestion is already addressed in *Forest Plan* or recent decision;
- Suggestion would require a change to law, regulation or rule outside the scope of the *Forest Plan*;
- Sufficient information or rationale is not provided and does not exist to support a change to the *Forest Plan*;
- Outside the mission or authority of the Forest Service;
- Research or data needed to evaluate if a change is needed;
- Suggestion is an implementation item that may be addressed at the project level.

Examples:

I'm today representing the Rivers to Wildlands, Inc., which is a new organization dedicated to creating a national park on the Ironton Unit of the Wayne, which would be eventually connected to the Shawnee State Forest. While we know the Forest Service cannot create a national park, Congress has to do that, the Forest Service can help or hinder the likelihood of this ever happening.

Right now Ohio is one of only two states with a national forest in it, without a designated wilderness area. If the Forest Service declares the Ironton Unit, or a large portion of it, to be a future wilderness area candidate in the long-term plan, we can move toward the national park idea. Why a national park? In addition to saving numerous vanishing old-growth forest species in Ohio, several missing or endangered species, like black bear and elk, could be returned to Ohio, and eventually that could be hunted. A national park always has a dramatic positive effect on the local economy, bringing all kinds of direct and indirect jobs. The most popular national park in the entire country is just 200 miles south of here, the Great Smoky Mountains National Park. There simply are not enough large national parks of over 60,000 acres in the Eastern United States, because over 90% of our large national parks our out west. The logging and oil and gas activities favored by the Forest Service in the past on the Wayne are not adding much money to the local economy, and are hindering tourism. Who wants to go camping or hunting on an island that looks like a Christmas tree pond? Our proposal creates three large hunting preserves, and large areas that could be used for ORV activities. Right now we only have about 50 oil and gas wells on that Ironton unit, compared to 950 on the Marietta Unit. It only generates less than \$10,000.00 in royalties for the local communities, but a national park will bring in folks with millions of dollars to spend from all over the United States. Logging and oil and gas extraction will never be very profitable for the taxpayers, or the local community, but such activities drive away both the rare wildlife and the tourists. Would you want to hike around oil barracks? I invite you to see my map in the back of the room, if you haven't already, to see how we could create such a park. Tell the Forest Service that you want logging and oil and gas leasing to stop on the Ironton Unit. [457]

State of O [Ohio?] Policy, currently the legislative branch has delegated the responsibility to the executive branch, executive committee, so that the Department of Agriculture takes care of our national forest, that was done via legislation. I just want everybody to be aware. Legislation is currently moving through Congress, as of 110 co-sponsors. If passed, logging on the national forest will be illegal. [444]

Secondly, I would like to see them vigorously pursue RTP grants that are available. In the last three years over \$3,000,000.00 has been passed by, by not pursuing those grants, and not pursuing the grant money we already have in place. For anyone doing any kind of work, a timeline, we have a grant, it has a track, it has a time it should be done, a time it should be moved on, and if those timelines aren't followed -- I know I work in the construction industry, and I'm one of them damn union guys, and I can tell you one thing, if you don't get your job done, you get the hell out. We have no seniority. We get our work done. All grants, all work should be timelined and treated as such. Anyone not performing would go on. I say the \$3,000,000.00 that would have been passed in the last three years would have taken care of many of the problems that have been presented, to me, in the last six months as problems on the Wayne with the impact. [610]

I'm with the Ohio Multi-Use Trails Association, and in the last Wayne plan, it was proposed for 300 miles of ORV trail to be available, which was a reduction down from the 600 miles that was already on the ground and documented as the plan went into effect. Since that time only 60 miles has been put in on the Athens Unit, and only 20 in on the Ironton Unit. During that time we have also found that the -- that due to the lack of money, and even though other plans have been put in, that no efforts have been put forward to complete this system, meaningful efforts. So I'm usually better than -- better than a loss for words, yes. In the new plan, I found out that the old plan, that that was not a promise, but a goal for 300 miles of trail. So, for the new plan, I propose that the 300 miles go from being a goal, to being an assignment, that landmarks of time schedules be associated with it, so that the 300 miles becomes a reality in the new plan, and not merely left as a goal. [461]

The Forest Service should recognize the financial impact that the forest has on local communities. Payment-in-lieu-of-taxes should be paid at the 100% level. Until PILTS are paid at the 100% level, the Forest Service should not acquire more land. We recognize that this requires congressional appropriation, and the Ohio Farm Bureau would be willing to work with the Forest Service to obtain the required appropriation. There is evidence that insufficient payments in the form of PILTS, to compensate for the lack of property taxes, is having a negative impact on the local communities. When you combine the restricted use of the forest with the inadequate PILTS, there is an economic hardship on the citizens, communities, and schools that are located in or near the Wayne National Forest region. [587]

Furthermore, there is no reason why national forest land should not be made available, since only a small portion of it, a few hundred acres in the whole area, for nuke plant construction, which would also eliminate dependence on foreign oil, and nuclear power produces no carbon dioxide. [480]

Appendix

A. List of Preparers

1. Core Revision Team

Robert Gianinny	Team Leader	
Rebecca Ewing	Forest Biologist	
Kenneth Arbogast	Public Affairs Officer	Reader/Coder
Constance Roberts	Administrative Assistant	Reader/Coder
Robyn Wright-Strauss	Student Intern	

B. EEO Statement

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