



Allegheny Forest Defense Project

Working to Protect Pennsylvania's Allegheny National Forest

Wednesday, January 21, 2026

Dear Regional Forester Gordie Blum,

Please see enclosed for our OBJECTION to the CORYDON PROJECT on the Allegheny National Forest. We are filing this objection on behalf of ourselves, Allegheny Forest Defense Project, and Heartwood. The Corydon Project, as proposed and preliminarily approved violates several federal laws and falls short of the land stewardship mission required of the US Forest Service.

The area in question is special to us. We have gathered in that area in the past, hiked the national scenic trail, explored on bikes, camped, and bird watched in this area. Jayne once lived in Bradford and spent a significant amount of time in this area. It is special to us and it is deserving of the best stewardship.

Sincerely,

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I. Scoping/EA Comment - Failure to Adequately Address Issues

We have had to repeat most of our Scoping comments when the EA was released, because the EA failed to adequately address these issues. Please follow the law, revise the Environmental Assessment into the legally required Environmental Impact Statement, and address the issues raised by the public. The US Forest Service is required by law to incorporate information provided by the public into their proposals.

The National Environmental Policy Act is very clear that stakeholders, including organizational stakeholders, are required to be involved in fostering the care and direction of environmental management of projects falling under its purview. The Corydon Project, and the comment process as applied for the project, fall short of this directive.

It should be noted that there were no substantive changes to this proposal between conception and the draft decision. There was no attempt to improve the project based on public input. There was no attempt to mitigate against the environmental damage proposed. The US Forest Service set a goal of increasing timber production and arbitrarily decided to approve this proposed action before analyzing the action's merits or costs.

A. Forest Data

Table 1 in the EA is misleading. While it's required to look at cumulative effects regarding private and state land conditions, the goals set in the Forest Plan are by Management Area of National Forest Service lands. Therefore it is unclear why we are looking at percent of private lands in certain age classes and not percent of management area. This needs to be correct in the Environmental Impact Statement required by law.

Additionally it presents the percent of land in late-structural habitat as 1%. It is not. It rounds to 0%. Why standard rounding rules are ignored here is unclear.

Further, a closer look shows that 5% of NFS lands fall within the 0 to 20 year age class. And most of this is within Management Area 3.0 suggesting that this area already meets Forest Plan Direction: "maintain 8 to 10 percent of the MA in early structural habitat (0 to 20 years old) over time."

Additionally the project proposes 1,835 acres of clearcutting within MA 3.0. Management which would increase 0 to 20 year age class by at least 7% which would put this area beyond Forest Plan Standards and Guidelines - resulting in too much 0 to 20 year age class. This is unacceptable.

But we are well short of Forest Plan requirements for managing late successional habitats. This is in part due to past thinning activities which reduce living and dead trees within stands - reducing late structural habitat conditions.

Therefore the sole priority for this project, vegetation class wise, should be to promote late successional habitat. This is also more consistent with the wants and desires of the American people.

B. Failure to Address the Primary Need for Late Structural Linkages

The main Purpose and Need for this project should reflect existing conditions. The obvious limitation between Forest Plan Direction is the difference between areas managed for late structural linkages (2,196 acres) and those lands currently meeting those conditions (52 acres). Everything else should be secondary as no other age class is as deficient as the late structural forest age class. It should be noted that since Black Cherry is a mid-successional tree, managing for black cherry fails to address the need for late structural linkages.

Similarly the project fails to meet the following need: “This proposal fails to prioritize the needs of species with viability concerns despite its listing as a need for this project.”

C. There is No “Lack of Natural Disturbance by Fire”

The purpose and need claims that “lack of natural disturbance by fire” is a purpose and need behind this project. But there is no “lack of natural disturbance by fire” because there simply is no history of “natural disturbance by fire” within the Allegheny National Forest. Current conditions of “fire” are consistent with historical records of “fire” (see e.g. Whitney 1990). This is a completely fabricated “need” that has no basis in reality. Further, the promotion of Oak via fire is an artificial attempt to promote commercial tree species over native biodiversity.

D. Diversity is Not Accurately Addressed

The proposed silvicultural methods do not establish a diversity of tree seedlings. We know this. (Marquis 1994)

E. Sustainability Not Addressed

This project cannot “Ensure a healthy ... and well stocked forest” using silvicultural methods that led to a 30% decline of black cherry within the Allegheny National Forest. It is proven that this does not work by the results documented on the ground. Yet, the Forest Service fails to address this issue and inaccurately understates the level of black cherry decline in its response to public comments.

F. Response to Comment is Patently False

The US Forest Service attempts to put words into our mouth (that we did not say and that are false) and then uses those words to dismiss our concerns as citizens and stakeholders. The Draft Decision states that “In short, AFDP’s comments reflect a fundamental disagreement with vegetation management on the Allegheny National Forest, an interpretation of policy that

the Forest Service does not agree with and a belief that past projects should have produced long-term ecological results without need for further intervention.”

This statement is false. Nowhere do we advocate for “without need for further intervention.” We specifically objected to clearcut logging which has factually produced negative results which the Forest Service cannot dispute. Intervention, for example, such as manual removal of non-native species, damaging forest roads, and increasing woody debris in streams we fully support when done right and with appropriate care - which unfortunately is not shown in the EA to be proposed with appropriate care.

Furthermore, the Allegheny Forest Defense Project believes in following the environmental laws which guide the national forest system such as the National Forest Management Act and we have been clear about that. This statement makes it clear that the “Forest Service does not agree” with following those laws. That is unlawful and a big reason behind why we are filing this appeal. The Proclamation establishing the Allegheny National Forest is clear - it exists primarily for watershed protection. It is clear from this draft decision that the Forest Service disagrees with its own directives under the law. The inevitable outcome of such internal disagreement is arbitrary and capricious decision making.

Finally, it is not up to the Forest Service to falsely characterize our position. That further demonstrates the arbitrary and capricious decision making behind this decision. When the Forest Service used a false description of our position to dismiss our stakeholder and citizen comments it broke the law.

It should also be noted that the response to comments admits that the outdated, and therefore legally inadequate Forest Plan, “provides the decision framework for the Corydon Project.” But go on to falsely claim that monitoring shows “over 22% decline” in monitoring data - when monitoring data shows this decline to be over 30%. If anything, stating that the decline is 22% when it is over 30% shows how out of touch this proposal is with actual on the ground conditions in the forest. Also it should be noted that this is the most current data - which the Forest Service has completely failed to address in this draft decision - and failed to address in a legally required environmental impact statement.

II. Failure to Maintain a Current Forest Plan

The National Forest Management Act is very clear - Forest Plans should be updated every 10 to 15 years. The Allegheny National Forest Land and Resource Management Plan is out of date, has not been maintained to address current information, and fails to provide and guarantee for the compliance of Allegheny National Forest management with applicable federal, state, and local laws.

A. Black Cherry Tree Decline

Conditions on the Allegheny National Forest have changed and require an immediate revision to Forest Plan direction. Current Forest Plan direction assumes that even-aged management that emphasizes “Allegheny Hardwoods”¹ would result in a “healthy forest”. This, however, has been shown to be untrue.

Currently, black cherry trees on the Allegheny National Forest are in decline. While technically predictable, the US Forest Service did NOT see this coming when it approved the current Land and Resource Management Plan. Therefore the current Forest Plan direction, which heavily emphasizes production of black cherry trees, does so without acknowledging this decline.

Recent monitoring conducted on the Allegheny National Forest identified decreases in black cherry crown health and observed mortality on the Allegheny National Forest and on the Allegheny Plateau (Long and others, 2015; Pennsylvania Bureau of Forestry 2015). Specifically, the proportion of standing dead black cherry stems on 97 intensive forest health monitoring plots containing black cherry on the Allegheny National Forest has increased from less than 10 percent in the 1998–2001 measurement cycle to more than 22 percent in the 2014–2015 measurement cycle. Similarly, continuous forest inventory data collected on the Pennsylvania High Plateau (Allegheny National Forest region) noted an increase from around 3 percent dead black cherry stems in the 1997–2000 measurement cycle to more than 30 percent in the 2009–2013 measurement cycle.²

In regards to other species, the US Forest Service has used threats to their health as an excuse to de-emphasize their development. But for some (obvious) reason, the US Forest Service treats the decline of black cherry trees differently and continues to emphasize black cherry tree production in spite of the fact that we now know this creates a less healthy forest. Their own data shows that black cherry trees are declining across the forest at higher rates than other species including American Beech and Eastern Hemlock.

G. Allegheny Hardwoods

The distribution of Allegheny Hardwoods (which makes up less than 1% of the native Allegheny National Forest) is only supposed to be 21 to 28% according to the Forest Plan: “The desired mix of forest types is 33 to 47 percent in upland hardwoods, 21 to 28 percent in Allegheny hardwoods, 15 to 17 percent in oak, 12 to 16 percent in northern hardwoods, 1 to 2 percent in hemlock, 1 to 3 percent in conifer, and 1 percent in aspen.” This, of course, differs greatly from the native composition of the Allegheny National Forest (Whitney 1990). Yet, according to recent research, more than 25% of the ANF is already made up of Allegheny Hardwoods. The logging methods employed and proposed within the Corydon project are known to promote Allegheny Hardwoods (Marquis 1994) and would push forest composition to exceed the desired vision described in the Forest Plan.

¹ Allegheny Hardwoods are made up of 55% black cherry and were originally defined exclusively by their % of black cherry. The US Forest Service has added Yellow Poplar and White Ash to the definition but their compositions are negligible meaning that the definition of Allegheny Hardwoods remains >50% black cherry. Allegheny National Forest Land and Resource Management Plan, P. A-9.

² Upper Mill Draft Environmental Assessment, p. 4

III. The Forest Plan Does Not Address Current Information

As documented in our comments, and inadequately addressed in the Draft Decision Notice issued by the agency, the Forest Plan does not anticipate nor does it address the wide-scale decline of black cherry trees across the Allegheny National Forest and surrounding areas. Decline of black cherry trees has reached unprecedented levels due to mismanagement and over-production of this short lived species. Yet, the Corydon Project proposes more management that emphasizes black cherry tree production over other native, healthier species of trees.

The bottom line is that the National Forest Management Act requires that Forest Plan's be revised or amended to address significant new information and this has not happened despite this alarming decline of black cherry trees - a predictable but unanticipated consequence of poor forest management by the US Forest Service.

Additionally, Environmental Impact Statements, including the EIS to the Forest Plan, must be updated to address significant new information such as the decline of black cherry trees. This has not occurred and this project and the Forest Plan it is predicated on are in violation of the National Environmental Policy Act (NEPA) as well as the NFMA and other applicable laws.

IV. The Failure to Complete an EIS is Arbitrary and Capricious

The NEPA is clear about when Environmental Impact Statements ((EIS) are required (see *Curry v US Forest Service*). In this case we have logging along a National Scenic Hiking Trail, adjacent to a roadless Wilderness Study Area, and near a National Recreation Area. The project proposes logging of a massive scale, over 2,371 acres of even-aged management - predominantly through clearcut logging. Clearcut logging is when 90% or more of the tree overstory is removed thereby destroying the forest canopy. This is the most destructive form of timber management - and a process which in the Allegheny National Forest has resulted in an over population of black cherry trees whose population are now collapsing. Under every circumstance, a project of this nature, of this destructive and potentially disastrous effect requires the preparation of an Environmental Impact Statement.

But that is not all. The project proposes 1,201 acres of prescribed fire to manipulate tree species composition to promote commercially lucrative Oak trees, 2,371 acres of herbicide treatments, and 941 acres of fencing. This is a massive project in an important area adjacent to

a National Recreation Area. Logging is planned adjacent to a Wilderness Study Area and along a National Scenic Hiking Trail. And then there is the planned road construction which includes conversion of non-system roads into system roads. Expanding the road system will have disastrous effects on native ecology long term. These are all preventable, avoidable controversial activities.

V. The Failure to Demonstrate the Need for this Project Violates the NFMA/NEPA

The Forest Service in the Draft Decision for the Corydon project continues to repeat this idea that they need to increase early successional habitat, but the Environmental Assessment and Draft Decision fail to demonstrate that this is actually a need based on current conditions of the project area - or the forest at large.

VI. Public Statements About Increasing Timber Production Without Completing Forest Plan Updates Demonstrate Illegal Arbitrary and Capricious Decision Making

The public statements by the agency underline that the agency is merely trying to increase timber production - and that all other facets of forest management are an afterthought. The fact is that stating to the public that your number one goal is to increase timber production, before completing an analysis of its validity, prejudices any and all decisions to approve timber management going forward.

VII. Failure to Demonstrate that Forest Plan Direction is achievable

The draft decision claims that “The approved activities ... are consistent with strategies described in the Forest Plan.” However, these strategies have been demonstrated, as shown earlier in this Objection, to create a failed condition in the forest. They have, for example, promoted an over-population of black cherry trees which are now declining at alarming rates. Furthermore, the Forest Plan is out of date, and its “strategies” are mooted by the passing of time and of course the failures of those strategies to create a “healthy forest” as promised.

The Draft Decision proceeds to claim that “The approved activities ... are consistent with the rationale for choice of vegetation management practices as defined in Appendix A of the Forest Plan.” Once again, these failed practices have resulted in an overpopulation of black cherry trees which are cataclysmically declining due to these failed management practices. So no, citing back to these practices, and failing to provide for mitigations, such as true species diversity within the Allegheny National Forest, falls short of meeting the requirements of both the NEPA and the NFMA. Nor does it address how this decline will impact Threatened, Endangered, and Sensitive Species.

In fact, the Draft Decision confirms that it is using the failures of their own management as causation for this project which pursues to continue these failed practices. It specifically proposes “regenerating stands at risk of decline” - decline that is occurring because of intentional over-population of black cherry trees and which is further propagated by the proposed action of clearcutting and herbicide use (as outlined in the Forest Service’s “Silviculture for Allegheny Hardwoods”).

Another area of concern is the stated goal of “Creating and Maintaining Early Structural habitat”. We have already noted that the Environmental Assessment failed to assess this accurately. This Draft Decision relies on 10 year old data (from a 2016 Monitoring and Evaluation Report) to justify its goals which include no site specific details for the project area. This is unacceptable and further reinforces that the agency is pursuing excuses to approve a decision they already made - rather than make an informed decision based on the facts enclosed in a thoroughly completed Environmental Impact Statement.

VIII. The Draft Decision is Based on False Premises

The Draft Decision claims “I am concerned that viable seed trees are declining in these stands to the point that it will become very difficult over time to successfully regenerate the forest stands with a diversity of tree species.” This is patently false. The seed trees are predominantly black cherry which does not create a diversity of tree species. The Forest Plan is clear that these practices promote “commercially” lucrative species. Pretending otherwise now is patently false.

The Decision goes on to claim that “We need to take advantage Otherwise, we run the risk of losing these stands to non-native invasive plant species or short-lived species such as diseased American beech or black birch.” This is 100% misleading and false characterization.

American Beech is not a short lived species or non-native species, and “diseased” American Beech will not dominate the overstory when healthy American Beech are available. Diseased black cherry are declining across the forest at higher rates than “diseased American beech” yet there is no acknowledgement of this issue - let alone analysis of its consequences.

The Decision even acknowledges that this decision has “Similarity to Previously Approved Activities” - activities that have created conditions resulting in a massive forest-wide decline of black cherry trees. Perpetuating massive forest decline conditions without even openly acknowledging them is patently illegal under both the NEPA and the NFMA.

Another area where the Draft Decision makes a false claim is when it states that “Alternatives were considered for this project.” For this it cites only an overly brief discussion on page 13 of “alternatives” which fails to meet the rigid standards required by the NEPA or the NFMA or Forest Service Manuals and Handbooks. This discussion dismisses consideration of those alternatives - they were never considered and analyzed to provide the deciding officer with a framework for actually making an informed decision.

Finally the finding of no significant impact is based on false legal premises. It suggests that only impact to local sites is considered. First off, creating clearcut openings that are over 40 acres, clearcutting adjacent to a Wilderness Study Area, logging along a National Scenic Trail, and spraying thousands of acres with herbicides (to name a few actions) is hardly insignificant when it comes to the local site. But most importantly, these are also not the only considerations required by the NEPA. The EA admits itself that it has to look at forest wide details (when it is convenient to the goal of pushing logging forward) while ignoring those details when convenient (ignoring cumulative effects in this Draft Decision). This is illegal.

Similarly, the project fails to address the illegality of the clearcuts greater than 40 acres. As we stated in our comments:

The openings greater than 40 acres fail to meet any legal requirements under the NFMA for creating such openings. For starters, creating openings greater than 40 acres needs to meet legal criteria, not just Regional Forester review. Additionally, such openings were intended to only occur as an exception, but on the Allegheny National Forest they are being used as the norm. This is illegal under the NFMA. One simply needs to review the other ongoing projects to see that the US Forest Service has abused discretion in adopting large clearcut openings in an array of projects from Upper Mill Creek to Madlick Run. Every single project, at nearly every single opportunity, the US Forest Service is acting as if creating large clearcuts is standard practice - this is illegal.

But the response to comment merely states without proof that “The Forest Service maintains that its application of clearcut openings greater than 40 acres complies with the National Forest Management Act (NFMA)”. They do not address the legal limitations on such openings in any meaningful way at all. This arbitrary and capricious dismissal of their own legal requirements makes this project decision null and void.

IX. The Proposed Action Attempts to Illegally Make an Exception in the Law into Normal Practice

The proposal plans to make 10 very large clearcut openings ranging in size from 53 to 141 acres. These are massive and will have serious effects to the natural environment. It should be noted, that the NFMA explicitly bans clearcuts greater than 40 acres in size from occurring except in limited circumstances. Creating hundreds of acres of massive clearcuts undermines the NFMA - particularly when the stated cause for the need for the massive openings are conditions artificially created by the US Forest Service's own mis-management which promoted an over population of black cherry trees which are now declining at alarming rates. And as noted earlier, the US Forest Service has never completed an environmental analysis acknowledging this decline - let alone guiding management practices in the face of this decline. This is illegal.