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Representing the counties, schools and municipalities of the Allegheny National Forest region.

March 17, 2026

Richard Hatfield
District Ranger
Bradford Ranger District
29 Forest Service Drive
Bradford, PA 16701

RE: West Sheffield Project Scoping Comments

Ranger Hatfield,

Thank you for the opportunity to comment on the proposed West Sheffield Project. The AFA's membership includes several of the best, most experienced foresters in the region, who also have a deep caring for the ANF and its future. Some of these professionals serve on our Board's Advocacy Committee and fully support your plans for the West Sheffield Project.

As you know, the AFA represents the local counties, municipalities, school districts and businesses that rely on multiple-use management and an active sustainable forestry program (including timber harvest) on the ANF to provide much needed revenues that replace taxes lost by federal land ownership. A sustainable supply of timber production is critical to meeting these communities' needs.

The AFA has long been concerned about the gap between the ANF Forest Plan's goals for desired and current forest conditions – primarily the age class imbalance and the accompanying forest health decline. We recognize the efforts made over the past several years and appreciate the progress achieved (*see Figure 1*). While all the proposed actions will benefit ANF health and productivity, we would like to point out how specific actions will also benefit the Warren County municipalities in which the project is located.

Silvicultural Treatments – The AFA supports all aspects of your proposed silvicultural treatments under this project. Particularly the Commercial Thin (110 acres) and Shelterwood/Removal Cut with Reserves (1,972 acres), as the sale of timber is the primary source of revenue for the 25% Fund and SRS payments our communities depend on. While those who object to active forest management and particularly timber harvest will likely object to this portion of the project, it is necessary, consistent with the ANF's 2007 Forest Plan, and critical for forest health, sustainable timber production, and economic benefit for our communities.

Decades of low harvest rates (compared to the ANF's growth and ASQ), declining timber prices, and increasing costs have resulted in a substantial decline in the revenues our communities receive (*see Figure 2*) and how far those monies go. The same is true for the revenues the ANF retains for forest management. Unfortunately, there is little we can do about the economic issues, making it even more important that timber harvest continues to increase on the ANF.

Fortunately, an increase in harvest is being not only facilitated, but ordered, by President Trump through EO14225 to expand timber production. While the Administration's efforts to "level the playing field" for U.S. timber and wood products producers will take time, the AFA appreciates efforts on the ANF to increase harvests even before EO14225 was issued. While these efforts were primarily for the forest and ecosystem health benefits, they also ensured ANF host communities' funding did not dwindle to insignificant levels.

Reforestation – The reforestation actions proposed for the West Sheffield Project will support the ANF's future as a sustainable source of timber, providing long-term economic benefit for our communities and the region's timber and wood products industries. The most recent data from Headwaters Economics¹ reports these industries employed 966 people in the four-county region in 2024 – a decline of 968 jobs since 2001. The ANF's planned increase in harvest over the next five years, including the harvest proposed in the West Sheffield Project, will provide a much-needed boost to the region's timber industry and its employees, and therefore other businesses, counties, communities, and schools.

Oak Stands – Aside from oak's monetary value (which we hope will increase and stabilize), the AFA recognizes its ecological importance, particularly its role in supporting wildlife through mast production and contributing to the diversity and structure of the forest. We support your efforts to retain, restore and regenerate oak stands, including prescribed fire.

Non-native invasive plants – This issue is also a significant concern to the AFA, as invasives forest sustainability and productivity, as well as the forest's appeal to visitors. In our opinion, the federal government is not giving this issue enough attention, effort, and funding. While we see the ANF applying as much effort to invasive plant treatments as resources allow, we recognize it's a drop-in-the-bucket compared to the need. We are also concerned about the increasing spread and introduction of additional invasive plant species over the 10-year treatment plan but understand that these treatments are dependent on available funding. We support your proposed treatment plan.

Wildlife – The AFA supports all proposed actions related to wildlife habitat, as they will contribute to the region's tourism appeal and related economic benefits. An important segment of tourism is the use of seasonal properties ("camps") by owners and guests who hunt, fish, and bird watch, which helps support local businesses and jobs. Improving wildlife habitats also helps to increase (or at least maintain) the values of these properties and their contributions to the local tax base.

Aquatic Improvements – The AFA supports the proposed actions related to watershed objectives, particularly those aimed at controlling storm water that can dramatically impact our small municipalities financially, affect private property and residents'/owners' ability to access their property, and limit visitors' ability to move about the ANF and surrounding area. As explained above related to wildlife, improvements to aquatic habitat will benefit tourism and seasonal property values and the tax base.

¹Headwaters Economics data for Elk, Forest, McKean and Warren counties accessed March 6, 2026:
<https://apps.headwaterseconomics.org/economic-profile-system/0500000US42047+0500000US42053+0500000US42083+0500000US42123ers+0500000US42123>

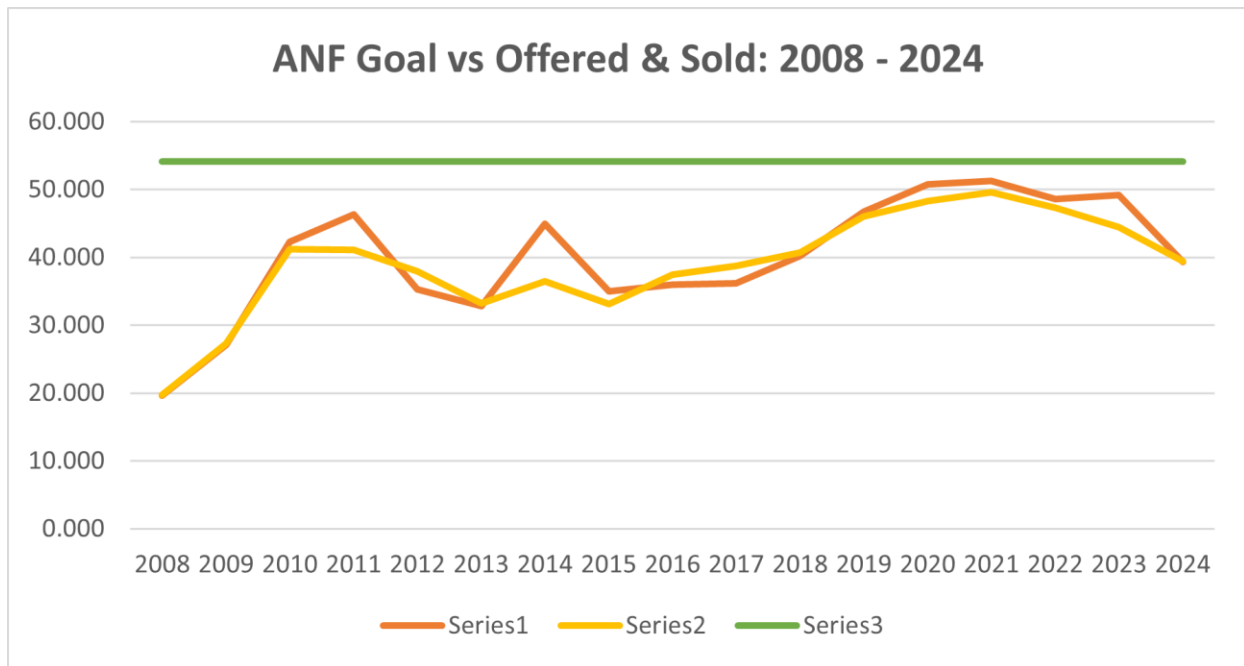
Transportation Improvements – The AFA wholeheartedly supports the proposed transportation system improvements, particularly your plans to harvest hazard trees that are merchantable (providing economic benefit for our communities), including those along existing non-system roads. We value the forest road system that facilitates active forest management and allows our visitors to access as much of the ANF as possible. As discussed previously, tourism and timber harvest are the ANF's two greatest economic benefits for our communities.

The Allegheny Forest Alliance appreciates your dedication to the health of the ANF, its sustainability, and ensuring that this national forest supports the communities that host it, now and in the future.

Sincerely,

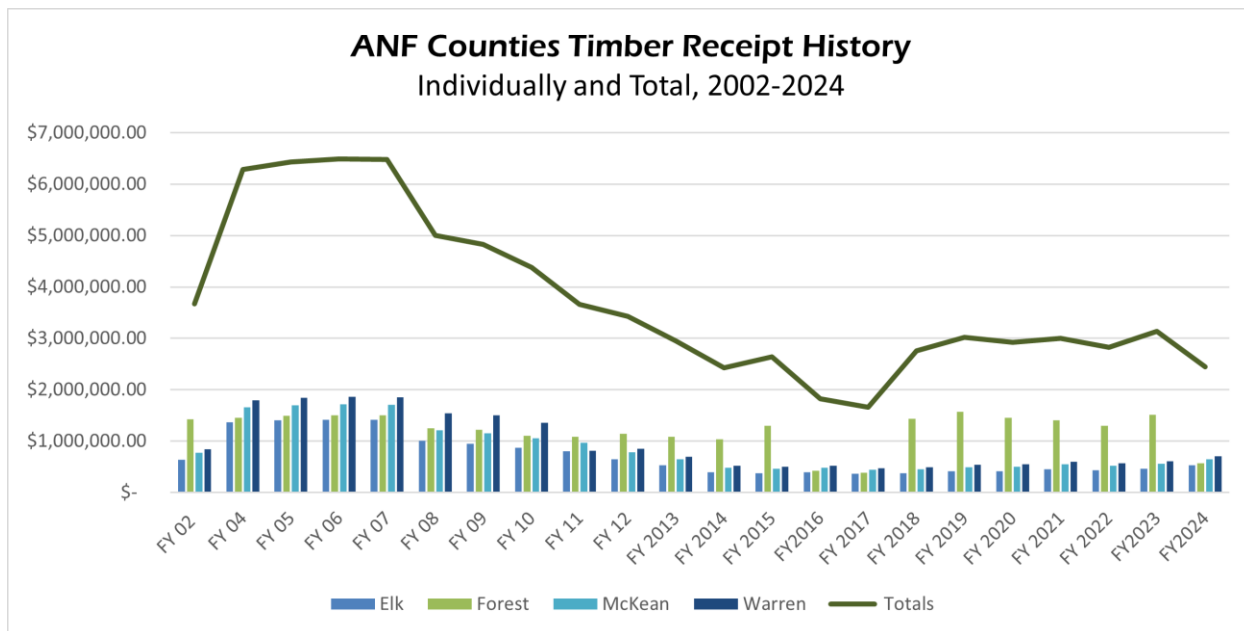
Tyler Martin
President/Chairman

Figure 1



**Data source: USFS PTSAR Administrative Unit Summaries.*

Figure 2



**FY2024 amount represents 25% Fund payment to Forest County due to a lapse in SRS reauthorization. Congress reauthorized SRS in December 2025. Retroactive SRS payment (minus 25% Fund payment received in Spring of 2025) is pending.*