



Allegheny Forest Defense Project

Working to Protect Pennsylvania's Allegheny National Forest

Friday, April 3, 2026

Dear Ranger Hatfield,

Please see enclosed for my comments on behalf of myself and Allegheny Forest Defense Project on the West Sheffield project on the Allegheny National Forest. I am providing these comments pursuant to the letter distributed on March 4, 2026 and meets the legally required timeframes for public comment.

This area is special to me. It is the very first area of the Allegheny National Forest that I visited going back to 1994. I have camped here, hiked here, even gotten lost in this area. I have been there so often I have even had a car break down in this area. I do not support the ridiculous proposal in the West Sheffield Project as it undermines the forest health in this area.

But also because it proposes logging that even silvicultural pseudo-science hasn't even tested. At no point has the US Forest Service tested clearcutting at this intensity and scale in this forest. There is zero evidence of successful regeneration at such scale - let alone protection of biodiversity and Endangered Species.

Therefore it is imperative that this project as proposed be scrapped in favor of science based management that reflects the legally required emphases for our national forests.

Sincerely,

Jayne Kleissler

Table of Contents

Table of Contents.....	2
I. Forest Plan Revision.....	4
A. Allowable Sale Quantity.....	4
B. Black Cherry Tree Decline.....	4
C. Allegheny Hardwoods.....	5
II. Purpose and Need.....	6
A. Species Viability.....	6
B. Repeating past practices.....	6
C. Cutting down trees reduces forest stocking.....	6
D. Unresearched Proposal.....	7
III. Impacts Requiring Analysis.....	7
A. Skidder Impacts.....	7
B. Tree Retention.....	8
IV. Forest Health Failures.....	8
A. Updating Management Direction.....	9
B. Purpose of the Allegheny National Forest.....	9
C. Beech Bark Disease.....	9
D. Regeneration Issues.....	10
E. Cumulative Impacts.....	10
F. Late Structural Habitat.....	10
V. Project Goals.....	10
A. Early Successional Habitat.....	10
B. Desired Tree Seedlings.....	11
VI. Environmental Impact Statement (EIS).....	11
A. Scale of the Project.....	11
B. Uncertainty.....	12
C. Actions are Significant.....	12
D. Actions Require an Update to the LRMP.....	12
E. Sensitive, Threatened, and Endangered Species.....	13
V. Additional Comments.....	13
A. Even-aged Management.....	13
B. Watershed Protection.....	14
VI. Conclusion.....	14

I. Forest Plan Revision

A. Allowable Sale Quantity

The Allowable Sale Quantity (ASQ) is a CAP, not a goal, on the legally allowable sales of timber from a national forest. The projects approved and proposed within the last 15 months by the Forest Service alone FAR exceed the legally allowed amount of cutting allowed in our national forests as it will demolish the ASQ.

Allegheny National Forest Logging Projects Approved or Proposed since January, 2025							
Project	Status	Clearcutting	Two Age Cutting	Thinning	Herbicides	Burning	Notes
West Sheffield	Proposed	1972	0	110	2082	1230	Comments Due April 3
Laurel Run	Proposed	1100	121	0	1221	972	EA Comments Due April 3 (I think)
North Spring Creek	Proposed	3014	42	11	3070	0	Comments Due April 22
Corydon	Proposed	1835	0	0	2371	1201	Objection Filed
Upper mill	Proposed	2244	0	0	2832	0	Draft Decision Issued, Objection Due Soon
Hemlock Run	Approved	1645	0	0	2382	737	Being Implemented
Porcupine Run	Approved	2552	0	0	2739	1108	Being Implemented
North Kane	Approved	1102	0	0	1249	0	Being Implemented
Madlick	Approved	1050	0	0	1459	0	Being Implemented
Proposed		10,165	163	121	11,576	3,403	
Approved		6,349	0	0	7,829	1,845	
Total		16,514	163	121	19,405	5,248	

The pure scale of these projects, independent of the ASQ, requires preparation of an Environmental Impact Statement under the National Environmental Policy Act (NEPA). But it also promises a direct violation of the ASQ limits set under the National Forest Management Act. As you know, the main threats to the health of the Allegheny National Forest are from Forest Service management which has resulted in an overpopulation of black cherry which is the primary declining species on the forest - making any exceptions to the ASQ irrelevant.

And of course all of this is illegal because the Allegheny National Forest does not have a legally required Land and Resource Management Plan. It is mandated by law that the Plan be revised every 10 to 15 years but the Plan is nearly 20 years old. And some of the logging being implemented under previously approved projects, which themselves are out of date decisions, pre-date the Forest Plan itself. None of this is legal.

B. 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. The fact is that this is a human caused problem - caused by US Forest Service management. It was completely avoidable if the US Forest Service had bothered to listen to public feedback pointing out these risks - feedback that has been ongoing for 30 years. Remember this when we discuss the public comment process later. The routine failure to take public feedback seriously is causing the mismanagement and unnecessary destruction of our public forest.

As evidenced in the scoping notice, the Forest Plan asserts that practices will “sustain ecosystem health” but as shown by practices on the ground - and the massive black cherry decline hitting the forest - the Forest Plan has failed this objective. In fact management practices have resulted in greater forest decline by promoting black cherry. This demonstrates that the Forest Plan is out of date, does not address the most current science, and needs to be revised. In fact it’s been clear that since this data first came to the surface EIGHT YEARS AGO in 2018 that should have been done - but it has not been done. All logging must stop pending revision of the forest plan.

C. Allegheny Hardwoods

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

The distribution of Allegheny Hardwoods 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, 25% of the ANF is already made up of Allegheny Hardwoods. The logging methods employed and proposed within the West Sheffield project are known to promote Allegheny Hardwoods (Marquis 1991) and would push forest composition to exceed the desired vision described in the Forest Plan.

II. Purpose and Need

A. Species Viability

The US Forest Service has a legal responsibility to maintain viability of Threatened, Endangered, and Sensitive (TES) Species under the National Forest Management Act (NFMA). However, improving species viability is never a “Purpose and Need” for a project. Sometimes there are general references to “wildlife habitat” but most projects emphasize early successional habitat, which is already provided in excess of natural levels for this forest, over other needs and most TES species require late successional habitats or similar. This failure to emphasize species viability for TES within the project needs to change and should be a driving force behind the Laurel Run Project.

It is a requirement that the US Forest Service “Place top priority on conservation and recovery of T&E and proposed species and their habitats through relevant NFS, state and private forestry, and research activities and programs.” (FSM 2670.31) Top priority means that TES conservation and recovery should be a primary purpose and need of ANF projects - not simply something that needs to be mitigated for.

B. Repeating past practices

Let’s be clear - repeating past practices is NOT being “responsive to emerging issues” as stated in the scoping notice. It’s the opposite. The Forest Service has been using the same silvicultural practices for 30 years and they have resulted in nothing but MORE forest decline. They are a failure and need to be abandoned IMMEDIATELY. Monitoring has shown this.

C. Cutting down trees reduces forest stocking

The scoping notice alleges it needs to “Ensure a healthy, diverse, resilient, and well stocked forest is provided in light of several concurrent forest health threats (Forest Plan, pages 14, 15, 19, and 21);” But research shows that logging in Allegheny National Forest reduces stocking. For example, in the 1990s Susan Stout studied salvage thinning in Allegheny National Forest

stands and her results showed that unlogged stands had more living and dead trees than the logged stands. That is more living trees than the logged stands. But also more dead trees (aka habitat) than the logged stands.

Clearcutting, whether with leave trees or using “Shelterwood” clearcuts doesn’t matter. It always results in a lesser stocked forest. In part because it removes the stocking from the forest. And in part because the methods used promote tree species that result in lesser stocking.

D. Unresearched Proposal

The creation of clearcut openings greater than 500 acres in size is both unstudied and unsupported. There simply is no research, not even in the pseudo-scientific field of silviculture, to back up this proposal - or to evaluate its effects to flora, fauna, water quality, etc... This cannot be allowed to go forward because it simply isn’t legal. It’s not consistent with the NFMA at all. It’s not consistent with Forest Service regulations at all. On no level is this proposal logical or supported in any way.

III. Impacts Requiring Analysis

A. Skidder Impacts

Skidder Machines are known to impact a portion of each unit causing soil compaction and potentially erosion. They also cause rutting and decrease the habitat area within the forest stand. Based on Monitoring and Evaluation, we know that each unit can be expected to have between 2.6 and 8.1% of impact from machinery.³

Monitoring of these impacts is inadequate. This purports to answer the question of “To what extent have standards and guidelines been applied?” and draws conclusions based on two stands? Two stands is not an adequate data sample - especially when they do not represent a cross section of activity from different timber sales involving different contractors and Forest Service oversight personnel. There is no actual attempt here to evaluate how these numbers are implemented across a broad range of slopes, soils, or forest types. It does not assess north facing slopes versus south facing slopes. It does not assess stands with steeper slopes or varying amounts of wet soils. It does nothing you would expect of a serious monitoring program to do. Were sites analyzed in the spring or Fall or during a thaw when soil conditions are particularly vulnerable?

Not only that, but the two stands show widely varying results - with one stand showing 4 times the impact of the other stand. Furthermore, in Compartment 708, Stand 10 it is alleged that there is no rut disturbance at all. We have monitored hundreds of logged units on the Allegheny

³ FY 2008 – FY 2016 Monitoring & Evaluation Report (2016), pp. 4-6.

National Forest and cannot recall a logging site with zero rutting. This monitoring is wholly inadequate.

But for the sake of the Laurel Run project, we only have this monitoring to go by which suggests that logging these acres will result in machine disturbance on top of the habitat degradation caused by the removal of trees. These impacts need to be analyzed in full within an EIS. In addition, the monitoring for this question needs to be stepped up to follow real, meaningful scientific and statistical criteria.

B. Tree Retention

Tree retention is identified within the Forest Plan as an important mitigation for wildlife. In truth, this has minimal benefit to wildlife. Opening the canopy causes great disturbance to the habitat including to any trees or snags retained after logging. Many of these trees and snags become victims of windthrow. Most trees, particularly Hemlock trees, when exposed to increasing amounts of sun and decreasing humidity die off. If anything these trees become habitat sinks - if occupied by wildlife that wildlife is ultimately killed when the tree dies off or blows over.

The Monitoring and Evaluation report looks at whether or not Forest Plan Standards and Guidelines in regards to snag and tree retention are met - but not whether or not those guidelines are effective at helping wildlife. Furthermore, this monitoring was done on the same exact two stands as the previously mentioned soil impact monitoring - meaning once again that a meaningful cross section of stands was not monitored. Once again we do not see data involving a variety of soil types, forest types, slope types, or habitat types. We also do not see results for how many of these trees or snags survived in 5 year, 10 year, 25 year or 50 year periods. Where is the meaningful monitoring that helps the US Forest Service actually evaluate whether or not Forest Plan guidelines are sufficient to meeting the needs of wildlife and watersheds?

IV. Forest Health Failures

This project will undoubtedly repeat an oft used phrase in projects on the Allegheny National Forest when it states the goal is “to achieve a healthy and resilient ecosystem.” That phrase sounds nice, but the US Forest Service has already completed several projects in the affected area purported to “achieve a healthy and resilient ecosystem.”

If you had achieved a healthy forest as promised with the prior projects, you could not claim to be working to achieve one with this project. Where is that healthy, diverse forest that you promised? If prior projects had achieved any such thing, there would be no “need” for this project. In fact the list of threats to the health of the Allegheny National Forest in the West Sheffield Project Area, has GROWN - despite a multitude of projects purported to make this

forest - and this project area - healthier. So how exactly are you claiming that this time, things will be different, and you will somehow achieve the healthy forest you have continually failed to establish over the years? Please explain with scientific support how your failure to achieve past project goals should be repeated here?

In fact, monitoring shows that these projects are not working. For example, as the previous Upper Mill EA cites, “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.” This is despite widespread massive projects such as the East Side project having been implemented since 1998. In fact, we warned in our comments on the East Side EIS that further propagation of black cherry over other species would lead to decline.

A. Updating Management Direction

Under the National Forest Management Act, the US Forest Service is required to monitor their activities, and when those activity results show that underlying assumptions of past projects are unreliable, to modify management direction. With the failure of past projects to achieve the desired future condition of a diverse, healthy forest as the US Forest Service alleged that they would, there is a statutory mandate to adapt and to revisit forest management direction as stipulated in the Land and Resource Management Plan of the Allegheny National Forest. The significant, apparently unpredicted decline of black cherry trees requires a revision to the LRMP immediately.

B. Purpose of the Allegheny National Forest

When the Allegheny National Forest was established in 1923, President Calvin Coolidge had a choice: establish the forest with the purpose of timber production or watershed protection or both. He did not choose to establish the Allegheny National Forest for timber production. He chose against that option. Therefore a project that places timber production above all other interests, as the Laurel Run Project does, is in violation of the very founding of the Allegheny National Forest.

C. Beech Bark Disease

You have identified the Beech Scale as a purpose for this project, but have proposed no action that addresses this forest health issue. Current management methods have emphasized the “salvage” (ie. cutting down and removing the tree from the forest) of beech trees. However, the US Forest Service has practiced this method for 3 decades and has made no progress on the advent of Beech Bark Disease. In other words, this strategy is ineffective. Agencies typically discourage the moving of Beech firewood to prevent spread but somehow overlook the fact that moving logged boles also spreads the disease. This spread of the

disease through logging activity needs to be addressed within the Environmental Impact Statement required by law.

D. Regeneration Issues

Regardless of the reason for regeneration issues, the National Forest Management Act requires that clearcut stands be regenerated within 5 years. The Forest Service has previously admitted, however, that “It can take up to 15 years for the regeneration in treated stands to reach 15 feet in height.” This is not legally approvable regeneration practice. Furthermore, the Land and Resource Management Plan was approved under the assumption that regeneration of black cherry trees was desirable. However, given the widespread and unpredicted decline of black cherry trees - it is necessary to revisit this assumption.

E. Cumulative Impacts

On its own, the scale and intensity of this action requires the development of an Environmental Impact Statement (EIS). However, these issues are magnified when looking at the cumulative impacts. For example, Forest Plan direction, according to this EA calls for 8% of the forest in early successional habitat. This is far in excess of natural conditions for this forest (Whitney 1990), but the project proposed, in combination with other projects, will create a project area in excess of 8% in early successional habitat - despite the significant portion of the project area that is supposed to be managed as late successional habitat under the Land and Resource Management Plan. These cumulative impacts must be studied in detail within an Environmental Impact Statement.

F. Late Structural Habitat

The EIS must adequately study and protect late structural habitat conditions such as snag and nurse log retention. Late successional habitat is critical to climate protection - still required by law despite some official's dislike for science.

V. Project Goals

A. Early Successional Habitat

The stated goal of the Forest Management Plan as cited in the EA is for 8% of all forest lands to be in the 0 to 20 year age class. This can't be right as the main Management Area (Management Area 3.0) for even-aged practices is limited to only “maintain 8 to 10 percent of the MA in early structural habitat (0 to 20 years old) over time.” Yet this project proposes over 2,000 acres of overstory removal which in combination with prior projects would result in excess of 9% of the project area falling within the 0 to 20 year age class. That's too much.

Also, cumulatively with previous decisions it proposes much more clearcutting. And the project area is not exclusively within the Management Area 3.0. Meaning this project would create in extreme excess of Management Area 3.0 goals within this area to be within the 0 to 20 year age class - far in excess of Forest Plan Goals. This is a violation of Forest Plan direction and this intense level of early successional further demonstrates a likely significant impact from this project requiring the preparation of a Environmental Impact Statement (EIS). Regardless of how you look at it, the target proposal far exceeds Forest Plan goals.

B. Desired Tree Seedlings

The project does not define “desired tree seedlings” but its heavy dependence on the SILVAH system for logging strongly suggests that the goal is to promote black cherry seedlings. At this time it seems prudent to remind you that black cherry only ever made up 0.8% of the native Allegheny National Forest overstory. And these trees are declining. Promoting a tree species that is not naturally dominant and that is declining in health is an odd strategy but we get that the tree is commercially lucrative. How does the US Forest Service purport to make the forest “healthy” if you are promoting a relatively short lived tree species that is in broad decline across the forest? This question is not adequately addressed within the environmental assessment.

VI. Environmental Impact Statement (EIS)

This project requires an Environmental Impact Statement for a large variety of reasons.

A. Scale of the Project

The scale of this project requires an Environmental Impact Statement. While the project area totals 22,012 acres, the proposal calls for clearcutting (overstory and shelterwood removal cuts) on 1,970 acres or 9% of the project area. But only a portion of the project area falls within Management Area 3 where early successional habitat goals are 8%. Additionally, other projects have approved clearcutting. We know that the greater than 40 acre clearcut openings alone will total 4,503 acres - far in excess of the 8% goal for early successional habitat in the Forest Plan. In fact that's closer to 25% of the Project Area.

That is an intensive amount of clearcutting and chemical use. Some of these clearcuts will range up to 1,471 acres in scale - with the creation of 11 clearcut areas greater than the National Forest Management Act 40 acre limit. This is extremely intense logging activities which also threaten to put the forest over the legal limit known as the ASQ. But most importantly, there is no science or pseudo science that justifies the scale and intensity of this

clearcutting. This project area would be decimated - just as previous projects have compromised the health of the Allegheny National Forest.

B. Uncertainty

The Forest Service purports to create a healthy forest with this project. But the agency has already claimed that they would create a healthy forest in this project area with prior projects including everything from the Sockeye EA to the East Side EIS to the Farnsworth EA. Yet, if the agency had achieved this goal with those projects as they claimed they would, this project would be unnecessary. But you are using your failure to achieve these goals in prior projects as an excuse to repeat a failed methodology - a methodology that has lead to a 22% decline in black cherry trees in the forest. This is the definition of an uncertain outcome. Instead of having success in the past, threats to the health of this forest area have grown. This project, just like the others, will not achieve the stated goals, because the US Forest Service's SILVAH-based methodology has never achieved these goals. This fallacy and this uncertainty requires that the agency revisit their stated goals and methodologies to fully and competently determine the best methods for achieving forest health outcomes. This can only be done in an Environmental Impact Statement where these failed methodologies can be analyzed more fully and the uncertain outcomes can be given proper due consideration.

C. Actions are Significant

It doesn't matter if you think your actions will have a positive impact, the determination under the law is whether or not the actions will have a significant impact - not a net significant impact but any significant impact. The purported support for this action makes it clear that this project will have a significant impact - even if the desired outcomes were achievable or desirable.

The project purports to address forest health conditions created in part by half a dozen invasive species, acid rain, and disease complexes. The claim is that logging, herbicide application, and fertilizer application will create a healthier forest but logging, herbicide, and fertilizer have never prevented any of those health conditions from harming the forest in the past. In fact, the mortality caused by logging simply guarantees a decline in forest health conditions and compromises the ability of the forest to defend itself against pest infestations.

D. Actions Require an Update to the LRMP

The fact is that conditions have changed on the Allegheny National Forest. The current Land and Resource Management Plan and supporting EIS project that these types of actions would lead to a healthier forest. But as documented in the EA: "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.” That is a significant change in the condition on the forest. The National Forest Management Act specifically requires that when monitoring on the forest shows that the underlying assumptions made in the Forest Plan and supporting EIS are shown to be incorrect that the Land and Resource Management Plan must be amended or revised to address these changed assumptions.

As previously explained “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.” Given the extensive use of even-aged management on Allegheny National Forest, the heavier density of declining black cherry trees on even-age managed forest areas, and the likelihood that decline will continue - action is needed to re-evaluate management direction within the Allegheny National Forest including this project area.

E. Sensitive, Threatened, and Endangered Species

This project must not assume “no impact” to sensitive, threatened, and endangered species. This would be a conclusion in search of analysis. There is no such thing as “no impact”. An analysis could theoretically conclude minimal impact, which we would disagree with, but claiming no impact is not a reachable conclusion. Commercial thinning and clearcutting practices are reducing nurse log and snag existence and opportunities needed for late successional habitat.

V. Additional Comments

A. Even-aged Management

Let’s be clear, we are opposed to the use of even-aged management to further propagate black cherry tree dominance within the Allegheny National Forest. As soils deplete due to logging, leaching of nutrients due to tops left on site, and acid rain, conditions for growth of black cherry will continue to deteriorate. Furthermore, black cherry are a well known shallow rooted, thin canopied tree which compromises the health of the native forest and leads to understories dominated by fern and depleted of native flora.

We predicted this black cherry decline when we commented on the East Side EIS. Black cherry is a relatively short lived species. It is susceptible to acid rain impacts, windthrow, and

deterioration due to increasingly depleted soils. As such, over emphasis of black cherry trees within the canopy is inherently unsustainable and must be stopped immediately.

It should be further noted that the extreme actions required to propagate black cherry are overly invasive and unnecessary. Black cherry propagation requires the over-use of herbicides, nitrogen based fertilizers, and fencing. None of these things are required at the levels with which they are used if other native species are prioritized. By defining the goal as “desired trees” rather than true diversity, the US Forest Service undermines protection of the ecological integrity of the Allegheny National Forest.

A good example of this misplaced priorities, on the ANF website it claims “Northern goshawks are listed as endangered species in Pennsylvania. It is unlawful under the Pennsylvania Game and Wildlife Code for anyone, including permitted falconers, to take a northern goshawk from the wild for any purpose. Northern goshawks, like many birds, are also federally protected under the Migratory Bird Treaty Act.” But here we are, in an area where Goshawk depend on interior forest but the Forest Service plans to fragment and decimate potential Goshawk habitat within much of the project area - and then claim that this will have “no effect.” The conclusion is absurd and not tenable with basic logic or ecological understanding.

B. Watershed Protection

It is well documented that logging operations release sediment and remove key structural components needed for water quality. Further, it is well established that watershed protection is why the Allegheny National Forest exists. Therefore, the impacts of logging operations that compromise watershed quality are not acceptable. The very purpose of the Allegheny National Forest is to counteract these issues as it's creation was a byproduct of logging induced flooding at the turn of the 20th century.

VI. Conclusion

This project isn't driven by science, it is driven by an ideology of pursuing “desired tree species”. This is SILVAH at work. SILVAH stands for Silviculture for Allegheny Hardwoods, a made up forest type. The entire purpose of projects like this is to further the propagation of the commercially lucrative black cherry tree. We know this because the methods proposed directly reflect those developed as part of the SILVAH method - documented within these Marquis research documents. See General Technical Report NE-183 and General Technical Report NE-96.

The Environmental Assessment is full of Orwellian speak for we're going to clearcut the forest and manipulate species composition to emphasize black cherry trees over other tree species. This isn't diversity - it is tree farming. This is an act expressly prohibited by the National Forest Management Act. And let's be clear, approval of such illegal management methods within the

Land and Resource Management Plan does not override the statutory obligations not to practice such methods. This project is therefore illegal.