

# 2016 State Forest Resource Management Plan

## Response to Public Comments

### INTRODUCTION

- The bureau received a number of comments emphasizing that state forest land is a public resource and that management of it should consider Article 1, Section 27 of the Constitution as well as our Strategic Plan - Penn's Wood.
  - RESPONSE: Article 1, Section 27 of the Constitution, the Conservation and Natural Resources Act, the Wild Resource Conservation Act, and Penn's Woods are all described in the SFRMP as "Planning Foundations" on which the SFRMP and all management is based. The bureau recognizes the people's right to "clean air, pure water, and to the preservation of natural, scenic, historic, and esthetic values of the environment." The policies, goals, and objectives of the SFRMP serve to preserve these rights and will help the bureau sustainably manage the state forest system for the benefit of all Commonwealth citizens, including generations yet to come.
- Several comments underscored the importance of core forests and requested that such areas be prioritized and protected.
  - RESPONSE: Even as the bureau was undertaking the development of the SFRMP, an effort was underway to analyze the state forest system for those areas most exhibiting the ecological characteristics of a core forest. This work has evolved since the release of the draft SFRMP, and in the final SFRMP, the bureau outlines a management strategy for better conserving these core forest areas through the establishment of Core Forest Focus Areas.
- Many people expressed concern over the effects of fragmentation, mainly due to gas development, but also related to other forms of development.
  - RESPONSE: The bureau recognizes that fragmentation is one of the greatest threats presented by gas development, right-of-way construction, and other forms of development. The draft and final SFRMP contain goals to minimize permanent conversion from forest to non-forest and to minimize forest fragmentation. This can be done in a number of ways, such as avoiding conversion and fragmentation or co-locating unavoidable fragmentation next to existing fragmenting features. The SFRMP also calls for improvement of edge habitat and mitigation of edge effects, and the bureau is presently working on a new set of best management practices to do just that. Options include new shrub or tree plantings in temporary work-spaces of pipelines, and feathering the edges along fragmenting features.

- The bureau received praise from many people for including climate change so prominently in this version of the SFRMP.
  - RESPONSE: The administration and bureau recognize that climate change is one of the most pressing issues facing state forest land. The bureau will continue to work on both climate adaptation and mitigation strategies as outlined in the SFRMP.
  
- The bureau received comments both requesting increased acreage of old growth areas and calling for no net increase in old growth areas. Proponents for more old growth frequently cited the role of old growth forests in sequestering carbon. Opponents typically felt that old growth areas had limited wildlife value and limited the land area available for timber harvesting.
  - RESPONSE: The bureau recognizes both the positive and negative attributes of old growth forests, and commenters had valid points on both sides of the issue. The bureau presently preserves all virgin old growth stands on state forest land in Natural Areas. Additionally, the bureau has identified 556,000 acres as proposed old growth areas, which it will continue to evaluate and refine. Fifty percent of state forest land is zoned as multiple resource, where active timber management improves and diversifies wildlife habitat. This is a good balance between proposed old growth and active management, and we do not foresee shifting this balance to any significant degree in this SFRMP's planning horizon.
  
- Similarly, the bureau received comments both expressing a desire for more Wild and Natural Areas (WNAs) and asking the bureau not to designate more WNAs.
  - RESPONSE: The bureau designates WNAs as areas of unique scenic, historic, geologic, or ecological value (Natural Areas) or having a large, undeveloped nature (Wild Areas). The bureau will continue to strategically designate WNAs as such areas are appropriately identified on the landscape; however, there is no long-term goal of increasing the acreage for WNAs. As part of the final SFRMP, the bureau finalized the designation of 5 Wild Areas that had previously been proposed in earlier plans.

- In comments on the Introduction, Recreation Chapter, and Geologic Resources Chapter, the bureau heard that many people are concerned with the conservation of wild character on state forest lands.
  - RESPONSE: The bureau appreciates that this is an important value of state forest land, and it recognized its importance by introducing a new section in this SFRMP specifically devoted to wild character. The bureau is committed to conserving wild character to the best of its ability in all management activities. As a result of public feedback, the bureau is developing a new and additional strategy to conserve wild character through the establishment of Wild Character Focus Areas.
  
- With regard to the acquisitions strategy, numerous people suggested that the bureau ensure mineral rights come with new properties as much as possible.
  - RESPONSE: The bureau recognizes that purchasing property without the intact mineral rights hampers our ability to control surface activity; however, in the present business climate, many landowners will not sell their property without severing the mineral rights or else property is available for which the mineral rights are already severed. Given that the bureau intends to hold this land in perpetuity, the benefit of acquiring the land in the long-term for the benefit of generations yet to come typically out-weights the short-term impacts that mineral development may create. In addition, through cooperation with mineral right owners, the bureau can often conserve other state forest uses and values, such as recreation and timber harvesting, while having the mineral development continue. Thus, while the bureau prefers to purchase property with mineral rights intact, it may sometimes chose to purchase property without mineral rights with the long-term benefits in mind.
  
- A number of people and several associations expressed a desire to have the Payment In Lieu of Taxes (PILT) increased.
  - RESPONSE: The amount of the PILT is not under the purview of the bureau. The Fiscal Year 2016-2017 Fiscal Code calls for an increase in the PILT beginning July 1, 2017.

## COMMUNICATIONS

- Several organizations and individuals called for the bureau to develop more Demonstration Forests, especially in urban areas.
  - RESPONSE: The bureau is committed to providing forest demonstration sites, as is specified Objective 1.3 of the Communications chapter. The development of forest demonstration sites is planned at the District level, and the bureau will take this recommendation under advisement as we develop new District Management Plans.
- The bureau had a number of people call for a more formal public input process for significant land management decisions, such as oil and gas leasing, timber sales, and infrastructure development; however, the bureau also received comments suggesting that a public input process for silvicultural activities would unnecessarily delay timber harvests, making them less effective.
  - RESPONSE: The bureau provides a number of opportunities for public input and feedback; these include annual district activity plans posted to the website, various advisory committees, the [PAForester@pa.gov](mailto:PAForester@pa.gov) email address, public comment cards, newsletters and news releases, and the public input process regarding the SFRMP. The new DCNR Oil and Gas Position Statement states that any future oil and gas leasing will involve a robust public input process.

## TIMBER AND FOREST PRODUCTS

- The bureau received a number of comments from individuals and organizations supporting the bureau's implementation of the harvest allocation model, such as the goal to balance the age class distribution of the forest. The bureau also heard support for the increases in acreage targets that occurred for the second 10-year cycle of the harvest allocation model.
  - RESPONSE: The bureau appreciate this support for the harvest allocation model and its harvest targets. The bureau plans to continue implementation of the harvest allocation to meet its various silvicultural and landscape management goals.

- A number of commenters asked that the bureau increase the amount of timber harvests to provide more early successional habitat, particularly due to its benefits for wildlife.
  - RESPONSE: As discussed above, the bureau intends to continue to follow the targets established in the harvest allocation model, which seeks to balance the age class distribution and provide a sustainable yield of timber products over a 140-year time span. The bureau does not plan to increase cuts for early successional habitat above harvest allocation model targets.
- The bureau received many comments both supporting and opposing our proposal to increase the maximum allowable regeneration cut size from 75 to 125 acres.
  - RESPONSE: The bureau is implementing the proposed change to advance certain ecological and landscape-level goals, increase the diversity of patch sizes on the landscape, make low-value harvests more economically feasible, and facilitate timber salvage after large mortality events.
- The bureau received a number of comments supporting our continued certification by the Forest Stewardship Council (FSC).
  - RESPONSE: The bureau appreciates that the public supports our FSC certification. We are adjusting Objective 3.6 of the Timber and Forest Products chapter to more explicitly state that we will maintain eligible acres as FSC certified forests. This would exclude our nursery operations and lands with existing timber reservations controlled by other entities.
- The bureau heard from both individuals and several organizations that the it should consider becoming dual certified by FSC and the Sustainable Forestry Initiative (SFI).
  - RESPONSE: The bureau is examining the possibility by considering the costs and benefits of dual certification and by consulting with stakeholders and advisory committees.

- A number of individuals suggested that mechanized harvesting is much safer than conventional logging or hand felling.
  - RESPONSE: The bureau does acknowledge it is much safer, and it is allowed on many sales. Unless specified otherwise in a contract, mechanized harvesting is permitted. Mechanized harvesting does not work well in situations where large trees are to be felled or on steep slopes. Most sales allow the discretion of the operator to decide what equipment should be used. In situations where regeneration is sensitive, the bureau does not allow mechanized harvesting because of the detrimental effects on the future forest. Contract restrictions on mechanized harvesting occurs on less than 1/3 of the bureau's timber sales.
- The bureau had several people point out that our discussion of whole tree harvesting and mechanized harvesting should be separated in the SFRMP, rather than being combined.
  - RESPONSE: The bureau agrees with this comment and have made an appropriate change in the SFRMP.

#### NATIVE WILD PLANTS

- The bureau heard from several commenters that we should find alternatives for wild rye seed mixes that have the potential to negatively impact hunting dogs.
  - RESPONSE: In response to these concerns, we have reduced the amount of rye grasses recommended in our seed mixes in our Planting and Seeding Guidelines and substituted Canada wild rye with Virginia wild rye because of its shorter awn. While the effort to reduce the use has been beneficial, we've recently decided to work towards removing rye grass (*Elymus spp.*) from our general seed mix by 2017. Rye grass is not a major component of our seed mixes and it does have wildlife value, as well deep roots for good soil stabilization. However, given the potential to harm hunting dogs we have decided to eliminate the awned grasses from our general seed mixes. The bureau is currently researching new mixes and alternative native cool season grasses to replace rye grass, that will provide the same habitat and environmental benefits. The current version of the 2016 Planting and Seeding Guidelines will be updated over the coming months to reflect this change.

## WILDLIFE

- The bureau received comments both supporting and opposing our use of the Deer Management Assistance Program (DMAP) on select state forest lands.
  - RESPONSE: DMAP is a valuable tool for the bureau to manage deer browse and improve forest regeneration. The bureau will continue to appropriately utilize DMAP on state forest lands. The bureau uses a number of measures to determine where DMAP is appropriate, such as the Vegetation Impact Protocol and assessments of past regeneration success.
- A number of comments suggested general concern for the bureau's protection of reptiles and amphibians.
  - RESPONSE: Generally, the bureau manages for a diversity of wildlife habitats across state forest land that accounts for reptile and amphibian habitat factors such as coarse woody debris, canopy openings over timber rattlesnake basking areas, and protective buffers around vernal pools, among other factors. The Wildlife chapter details a number of other ways that the bureau is protective of reptiles and amphibians. In cooperation with the Fish and Boat Commission, the bureau has designated 28 Natural Areas as Reptile and Amphibian Protection Areas. The bureau participates in the Pennsylvania Amphibian and Reptile Survey. The bureau conducts Pennsylvania Natural Diversity Inventory searches, which include reptiles and amphibians for which there is a conservation concern, for all timber sales and projects that undergo a State Forest Environmental Review. These searches reveal any species that need avoidance or mitigation as part of such projects.

- The bureau heard from several associations that it should involve gas industry representation in discussions regarding the bat Habitat Conservation Plan, as it will affect gas operators similarly to how it will affect timber operations.
  - RESPONSE: The Forestry Habitat Conservation Plan for Bats on Pennsylvania State Game Lands, State Forests, and State Parks (HCP) covers forest management operations on DCNR and PGC Lands. The covered forest management activities are DCNR and PGC's forest regeneration and operations (timber harvests, fencing, and firewood), roads and trails associated with timber harvests, prescribed fire, and any activities associated with implementing the HCP such as habitat restoration or HCP monitoring efforts. The extraction of subsurface resources has the potential to impact Indiana bats and northern long-eared bats. However, all such subsurface extraction efforts are subject to their own compliance processes and are excluded from coverage by this HCP, which focuses solely on forestry and the forestry-related activities. There is a HCP Stakeholder Group comprised of experts and professionals in the timber, prescribed fire, and wildlife fields. In order to limit the Stakeholder Group to a manageable number of participants, the groups invited to participate were those who could provide direct input on the covered activities in the HCP (e.g., land resource management agencies, wildlife professionals, timber professionals, and fire professionals). However, the public will be afforded an opportunity to fully participate and comment on the HCP through the federal National Environmental Policy Act (NEPA) process.

## GEOLOGIC RESOURCES

- The bureau had a large number of people and organizations provide comments that were generally against the development of natural gas on state forest land, citing various concerns, such as fragmentation, loss of wild character, and potential impacts on wildlife and water resources.
  - RESPONSE: The bureau recognizes the negative perception that many people expressed regarding gas development, and the bureau is doing its best to manage this use of state forest land in the most environmentally-sensitive way possible. The bureau continues to revise its guidelines to utilize the best known management practices, and it continues the shale-gas monitoring program to study any potential effects of gas development on the environment. The department has published a new position statement on gas development on DCNR lands and incorporated it into the SFRMP.

- The bureau also heard from a few individuals that supported gas development on state forest land.
  - RESPONSE: The bureau recognizes benefits of gas development, such as improved roads, economic growth for nearby communities, and revenue for the commonwealth.
  
- A number of people and organizations suggested that the Oil and Gas Lease Fund Act requires that all rents and royalties from oil and gas leases of Commonwealth State Forest land be placed in a special fund to be used exclusively for conservation, recreation, dams, and flood control.
  - RESPONSE: Revenues generated from a lease sale on state forest lands, rents and royalties generated from production go to the Oil and Gas Lease Fund. The fund was created in 1955 to be used for conservation, recreation and flood control programs at the direction of what is now the Department of Conservation and Natural Resources. Lease sale funds have been used to purchase state park and forest lands; to acquire the mineral rights for state parks and forests; infrastructure and trail improvements; habitat protection and restoration; recreation and other equipment; and to support the operations of the Department of Conservation and Natural Resources. Act 50 of 2009 provided \$50 million for an annual appropriation from the Oil and Gas Lease Fund to DCNR. Act 13 of 2012, also known as the natural gas impact fee, authorizes the transfer of \$20 million in 2013, and \$35 million thereafter, from the Oil and Gas Lease Fund to the Environmental Stewardship Fund. The Environmental Stewardship Fund also supports state parks and forests, and conservation and recreation programs. Any further appropriations from the Oil and Gas Lease Fund will be determined outside the purview of the bureau.

- A large number of commenters called for the bureau to halt all drilling activities within our state forests for companies who have violations.
  - RESPONSE: Issuance of violations of state environmental regulations' is the primary responsibility of the Department of Environmental Protection (DEP) in Pennsylvania. DCNR does not have environmental regulatory authority under the law. As such, DCNR does not have the regulatory power to halt drilling operations as a result of any notice of violation issued by the DEP. DCNR manages its leasing program by contract. The lease contract requires the lessee to be in compliance with federal and state law at all times. Once a notice of violation (NOV) is issued, DCNR is required to allow the process to proceed according to state law until the lessee satisfies all state laws. Assuming the NOV is completed to the satisfaction of DEP, DCNR would have no grounds to take any actions under the lease contract against the lessee. To date there are no outstanding NOV's against any lessee on state forest lands. All NOV's have been satisfied and cleared by DEP.
  
- The bureau had a large number of comments expressing support for Governor's Executive Order that placed a conditional moratorium on additional gas leasing in state forests. Many other commenters suggested that the bureau ban leasing entirely in the SFRMP.
  - RESPONSE: To address these concerns, the department has developed a new position statement on gas development on state forest land. This document has been incorporated into the SFRMP. It states that no new leasing will be permitted on DCNR lands.
  
- Several organizations and individuals requested more detail on how the bureau will evaluate decisions for new leasing or what the bureau should do before allowing new leasing.
  - RESPONSE: As noted in the position statement, if the bureau proposes additional leasing, it will involve a robust public input process. Further details will be determined at the appropriate time.

- The bureau received a large number of comments asking us to prohibit drilling at the surface within the boundaries of state forests to minimize direct environmental impacts to these special places whenever possible.
  - RESPONSE: Where the commonwealth owns the oil and gas rights beneath state forest lands, the bureau only permits drilling on state forest lands when the bureau has entered into an oil and gas lease. Some of these oil and gas leases prohibit or limit surface development. Where the bureau has entered into oil and gas leases on state forest lands, the bureau only allows wells to be drilled after extensive environmental review and the approval of the bureau under the strict terms of the lease. Where the commonwealth does not own the oil and gas rights beneath state forest lands (severed rights), the bureau offers to enter into a surface use agreement with the operator, and if the operator agrees, both the bureau and the operator negotiate the terms of the surface use agreement.
  
- The bureau also received a large number of comments asking it to prohibit surface impacts where mineral rights are not owned by the commonwealth.
  - RESPONSE: In Pennsylvania, subsurface rights in oil, gas, gas storage, coal and other hard minerals may be separated or severed from the surface. Unless otherwise explicitly stated, severed rights owners have reasonable use of the surface to develop their subsurface rights. The bureau offers to enter into a surface use agreement with the severed rights owner, and if the severed rights owner agrees, both the bureau and the severed rights owner negotiate the terms of the surface use agreement.
  
- A large number of commenters asked the bureau to make operators use horizontal drilling beneath severed rights land.
  - RESPONSE: In Pennsylvania, subsurface rights in oil, gas, gas storage, coal and other hard minerals may be separated or severed from the surface. In most severed rights situations, the bureau cannot demand the use of any specific technology, such as horizontal drilling. However, the bureau offers to enter into a surface use agreement with the severed rights owner, and if the severed rights owner agrees, both the bureau and the severed rights owner negotiate the terms of the surface use agreement.

- The bureau received comments suggesting that we have training for DCNR staff by DEP on how to spot violations.
  - RESPONSE: Identifying and dealing with violations is a primary responsibility of DEP. If bureau staff identify any potential violations, they report them to the appropriate DEP authorities. Objective 4.5 of the Geologic Resources chapter indicates that the bureau will collaborate with DEP and other organizations on monitoring, training, and research regarding gas development.
- The bureau heard a number of comments generally calling for it to assess the financial need of managing gas development.
  - RESPONSE: The bureau continuously assesses the staff time and resources necessary to appropriately manage gas activity. The bureau will continue to do so, and request adjustments to staffing or resources as deemed necessary.
- A number of commenters expressed concerns regarding the impacts of pipeline construction on state forest lands. Some of these comments came with recommendations for dealing with such impacts, such as colocation of pipelines
  - RESPONSE: The bureau agrees that pipeline construction represents a significant impact on state forest land. Based on law regarding severed rights situations and our lease language, gas operators have the right to construct pipelines to get their gas to marketing lines. However, the bureau has a number of best management practices regarding pipeline siting and construction that seek to minimize the effects on the environment (see the bureau's *Guidelines for Administering Oil and Gas Activity on State Forest Lands*).
- Numerous commenters expressed questions or concerns about how the bureau is dealing with the existing impacts of gas development, such as what the buffers and restrictions are.
  - RESPONSE: The bureau manages gas development according to lease provisions and using the *Guidelines for Administering Oil and Gas Activity on State Forest Lands*. The bureau also reported on potential effects of gas development in the *2014 Shale-Gas Monitoring Report*. Links to the Guidelines and Monitoring Report are found in the Guidelines, Tools, and Resources section of the Geologic Resources chapter.

- A large number of commenters called for the bureau to require compressor stations to comply with noise limits and to shut them down if they fail to do so.
  - RESPONSE: Most lease agreements do not contain specific noise level requirements. However, lessees/operators are encouraged to follow the guidance provided in the *Guidelines for Administering Oil and Gas Activity on State Forest Lands* regarding noise levels at compressor stations. The bureau monitors noise levels around compressor stations and will continue to work cooperatively with its operators to meet the recommended noise level guideline. The bureau also is engaged in several research projects regarding compressor noise levels, and it will refine its noise guidelines as new information becomes available. The bureau will collaborate with lessees/operators to identify technology and facility siting strategies that minimize noise and strongly encourage its lessees/operators to adopt such practices.
- Commenters also specified that the bureau should site compressor stations away from recreation sites.
  - RESPONSE: On a broad level, the entire state forest system is used for passive recreation, and so a compressor station at any location is bound to have some level of recreational impact. The bureau's *Guidelines for Administering Oil and Gas Activity on State Forest Land* include guidance on compressor siting and noise mitigation. Siting of compressors takes into account ecological, economic, and social (including recreational) factors.

- The bureau received a number of comments calling for the bureau to establish a contingency fund or escrow account to ensure the reclamation of lands affected by shale-gas development.
  - RESPONSE: All gas leases have the requirement for the lessee to put up bonding for performance and well plugging. This bonding is aside from and in addition to any regulatory bond the DEP, Susquehanna River Basin Commission, or other government agency may require in PA. There are two types of bonding required by all gas leases. The first is performance bonding for general liability for financial and damages coverage, and the second is well plugging bonds for specific wells and amounts. The performance bonds are general in nature and may be called for unpaid obligations, uncompensated damages, disputes involving facility installation or removals, and final lease termination general cleanup obligations. For the approximate 100 leases in effect, the department has a total of \$7,465,000 in performance bonds on file, or approximately \$75,000 per lease contract. The well plugging bonds on file cover approximately 600 shale-gas wells and 400 older shallow conventional wells. Each shale well is required to have \$100,000 plugging bonding on file and the older conventional wells vary with depth from \$10,000 each to \$50,000 each to be on file. The department is holding a total of \$65,292,500 plugging bonding on file currently, which is calculated to be sufficient to address any well abandonment issues for its leasing program. As new wells are drilled and produced more bonding is required to be added to the total. This information on bonding has been added to the SFRMP. A section on how site rehabilitation is handled was also added.
  
- The bureau received multiple comments from individuals and organizations that were against potential development of Clarence Moore lands in Loyalsock State Forest.
  - RESPONSE: The bureau recognizes that many people value the natural resources and recreational opportunities found within the area of Loyalsock State Forest known as “Clarence Moore lands.” The legal issues surrounding these 18,000 acres are unique and complex and involve private ownership of sub-surface oil and gas rights and the 1989 Court Case Belden and Blake vs. DCNR. The bureau currently has a policy of no additional leases on state forest lands where it owns or controls subsurface oil and gas rights. In regards to the unique situation presented by former Clarence Moore lands, DCNR is continually reviewing its options to best conserve the natural resources of this important and highly valued area of Loyalsock State Forest.

## WILDLAND FIRE

- The bureau received numerous comments supporting use of prescribed fire.
  - RESPONSE: The bureau appreciates hearing from the public on this issue. The bureau will continue to use prescribed fire in a safe manner to meet silvicultural and habitat management goals.

## FOREST HEALTH

- The bureau received several comments asking that it place greater emphasis on the control of invasive plants.
  - RESPONSE: While the SFRMP already contained a lengthy discussion of invasive plants, the bureau has added material to that section as well as adjusted goals and objectives in the Forest Health chapter to reflect the importance of this issue to the bureau.

## RECREATION

- The bureau heard a variety of comments on the value of and revenue derived from recreation on state forest land.
  - RESPONSE: The bureau appreciates that this is a well acknowledged value of state forest land, as exemplified by the various goals and objectives in the Recreation chapter of the SFRMP, it is a use the bureau intends to continue to promote.

- The bureau received many comments regarding the use of ATVs and off-highway motor vehicles on state forest lands. Some commenters supported the current policy on ATVs, which is that no new trail systems will be created, but strategic connectors, not to include state forest roads, may be constructed between state forest lands and off-site opportunities for ATV riding. Other commenters wished that no ATVs be permitted on state forest land. Another group was against the current policy and requested expansion of the ATV system on state forest lands. Finally, some commenters asked that the bureau permit the use of other off-highway motor vehicles on state forest lands.
  - RESPONSE: The bureau intends to maintain the existing policy on ATVs and off-highway motor vehicles on state forest lands. The bureau appreciate the concerns raised on both sides of this issue, but the bureau contends that the present policy balances the needs of the ATV community with that of other forest users.
  
- The bureau received comments that there needs to be better communication of impacts to snowmobile trails from loggers. The bureau also received comments that joint-use roads should be restricted during timber sale operations to allow operators to finish work in a timely manner.
  - RESPONSE: Each forest district posts an annual District Management Activity Plan on their webpage to communicate to the public about upcoming management activities, projects, and events that will be conducted. Timber harvest contracts allow operators time to complete their work but can be heavily restricted by wet conditions or timing to avoid impacts to sensitive species. The bureau may utilize temporary snowmobile closures to allow operators to finish sales in a timely manner.
  
- The bureau received a mixture of comments both for and against shared-use trails (i.e., some like them, others want to see trails designated for specific uses).
  - RESPONSE: The bureau's present philosophy is to manage most state forest trails as shared-use, providing a high-quality experience for a variety of users across the system. If a given trail will not support a specific use, then such a trail may have specific designations or restrictions.

- Several commenters suggested the use of high school students or people who have to do community service as volunteers to maintain hiking trails and infrastructure.
  - RESPONSE: People of all ages can participate in the Conservation Volunteer Program, which matches interests and abilities with appropriate outdoor projects. There are currently 2,822 Conservation Volunteers registered with the Bureau of Forestry. In addition, the department is initiating a new youth conservation corps program that will offer work experience, job training, and educational opportunities to young people who complete recreation and conservation projects on Pennsylvania's public lands.
- The bureau received several comments about use of carrying capacity or thresholds for managing recreation.
  - RESPONSE: The idea of carrying capacity and use thresholds for recreation is an emerging issue. The bureau is examining these ideas, and it has several pilot projects underway.
- A number of commenters asked for the bureau to consider recreational aviation as a use of state forest land, such as providing recreational landing strips.
  - RESPONSE: The bureau has determined that on-the-ground aviation use is not compatible with other state forest resources, uses, and values.

## INFRASTRUCTURE

- The bureau heard both support and opposition for wind and solar energy development on state forest land.
  - RESPONSE: The bureau does not presently have the authority to allow wind or solar energy development on state forest land. At present time, the bureau does not consider these uses to be compatible with other state forest uses and values.

## CULTURAL AND HISTORIC RESOURCES

- The bureau received a fair number of comments that suggested the bureau promote cultural and historic resources on state forest land through the use of interpretive signage.
  - RESPONSE: Historic resources are the property of all Pennsylvanians. As a partial trustee of these resources, the bureau is taking steps to increase cooperation with Pennsylvania Historic and Museum Commission (PHMC), who has jurisdiction over the most significant sites, and the bureau is developing strategies to more thoroughly inventory state forest lands to record the presence and quality of these resources. PHMC may develop signage for the most significant sites that are on the National Register of Historic Places and the bureau could develop similar signage where warranted. However, at some instances in the past, the use of signage has come into conflict with the primitive, wild-character values that the bureau has promoted on state forest land and developing signage at certain, sensitive cultural or historic resources may place them at risk for vandalism. That said, the opportunistic need for some interpretive signage on state forest land for the purpose of promoting heritage resources may exist and may be addressed in the future, but the more immediate need is for inventory and management of cultural and historic resources.

## MISCELLANEOUS

- The bureau received several general, positive comments on the SFRMP, such as that this revision was more concise, that it was a laudable effort, or that the public meetings were a valuable endeavor.
  - RESPONSE: The bureau appreciates the positive feedback and also the constructive criticism that it received on the SFRMP. The bureau did its best to incorporate the various input into the final version of the SFRMP.
- Many people requested that the bureau extend the length of the public comment period.
  - RESPONSE: The bureau appreciates that people expressed this desire to us early in the process, and the bureau was pleased to extend the comment period by two months. The bureau received a lot of valuable input during the extended timeframe.

- Several commenters felt that the SFRMP was too general.
  - RESPONSE: The bureau hopes that people can appreciate that for a state-wide plan, a certain level of generality and broad perspective was appropriate for the SFRMP. More specific and localized objectives will be forthcoming in the revised District Management Plans.