

January 22, 2009

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Distinguished Officials,

We as biologists, ecologists, and economists write in support of the Friends of Allegheny Wilderness (FAW) and the *Citizens' Wilderness Proposal for Pennsylvania's Allegheny National Forest*. As the population of the northeastern United States continues to increase, the ecological and economic value of the few remaining wild areas here increases significantly. The diversity, beauty, and research value of these natural areas, such as those carefully delineated in the *Citizens' Wilderness Proposal*, contributes to the high quality of life many Pennsylvanians currently enjoy. Just as importantly, they include and protect the priceless biodiversity found in Pennsylvania's public lands.

The Allegheny National Forest (ANF) is located on the Allegheny Plateau in northwest Pennsylvania in Elk, Forest, McKean, and Warren Counties. It was established under the authority of the 1911 Weeks Act to promote reforestation in the aftermath of decades of unsustainable logging, to protect the Allegheny River watershed, and for timber production. The proclamation boundary encompasses 742,693 acres, with approximately 513,300 acres currently owned by the citizens of the United States and managed by the U.S. Forest Service.

Much of the ANF has largely recovered from wholesale clearcutting at the turn of the 20th century, albeit with a remarkably different forest structure and composition. Black cherry, oak, and other commercially valuable species have largely replaced the natural historic composition dominated by eastern hemlock, American beech, eastern white pine, and others. Historically, the vast majority of forested area on the Allegheny Plateau could accurately have been termed old-growth, and there are a few remnant areas of old-growth today on the Plateau, as well as second-growth areas that are beginning to approach that threshold. We must plan now if future generations of Pennsylvanians are to have greater areas of biologically valuable later-successional and old-growth forest available to them.

In 1964, Congress passed the Wilderness Act, establishing our National Wilderness Preservation System. Wilderness areas are designated by Congress on America's federal public lands -- national forests, national parks, national wildlife refuges, and lands managed by the Bureau of Land Management.

Wilderness is important because it provides permanent undisturbed habitat for native flora and fauna, outdoor recreation opportunities, vital reference areas for scientists, and economic benefits including help in diversifying local and regional economies.

In 1975 there was an opportunity for approximately 30,000 acres of the ANF to be designated under the Eastern Wilderness Areas Act – legislation which recognized that “In the more populous eastern half of the United States there is an urgent need to identify, study, designate, and preserve areas for addition to the National Wilderness Preservation System.” Pennsylvania’s two Senators at that time, Hugh Scott and Richard Schweiker, strongly supported the ANF acreage. Unfortunately, their efforts were not supported in the House of Representatives version of the bill.

In 1984 local Congressman Bill Clinger and Senator Specter did support the Pennsylvania Wilderness Act, designating the Hickory Creek and Allegheny Islands Wilderness Areas, but the wilderness shortage here in Pennsylvania remains acute. Together, the Hickory Creek and Allegheny Islands Wilderness Areas total only about 9,000 acres – less than two percent of the entire ANF. This represents less than three one-thousandths of a percent of all land in the Commonwealth, or one acre of wilderness for every six square miles across Pennsylvania. Nationally, about 18 percent of all national forest land is protected as wilderness, and in the East the figure is 12 percent. The 1986 Allegheny National Forest Land and Resource Management Plan itself formally identifies this wilderness shortage:

It must be concluded that the demand for wilderness experience on the ANF is very high, given that half the country’s population lies within a day’s drive of the Forest.... It seems obvious that the demand for wilderness designation on the Forest is high, and the available supply in the regional area is low.

Fortuitously, the areas for which Senators Scott and Schweiker advocated wilderness designation still exist largely as undeveloped, unroaded areas that could be added easily to the National Wilderness Preservation System.

Efforts to designate additional wilderness in the ANF should not be viewed as a referendum on the legitimacy of timber harvest. After all, this was part of the reason President Calvin Coolidge established the ANF in 1923. However, there is a clear need to protect new federal wilderness in the ANF, in areas where timbering is not a significant activity, to complete the mandate for eastern national forests established with the 1960 Multiple-Use Sustained-Yield Act, Wilderness Act, and Eastern Wilderness Areas Act, and to balance the range of uses in the Forest Service multiple-use philosophy.

Threatened and endangered species listed under the 1973 Endangered Species Act occurring in or near ANF include the Indiana bat, the clubshell mussel, and the northern riffleshell mussel (endangered), and the small whorled pogonia (threatened). Two mammals – river otters and fishers – once present in the ANF and subsequently eliminated by overexploitation were reintroduced in the 1990s. The reintroduced fisher population has made significant gains and appears to be reproducing successfully. Large tracts of continuous forest canopy cover, such as that provided by federal wilderness areas, are known to provide high quality habitat for fishers. Many birds such as the bald eagle, goshawk, cerulean warbler, and the blackburnian warbler benefit greatly from large blocks of roadless, intact forest.

Beyond protection for individual species, wilderness designations would help to improve ecological health across the entire landscape. In the past, ANF and other scientists have proposed maintaining late-successional corridors throughout the forest. The wilderness proposed by FAW would help fulfill these objectives while guaranteeing the survival and eventual emergence of old-growth reserves for future generations as the forest continues to mature, and the inevitable process of natural succession moves us farther away from the turn-of-the-20th century clearcutting.

Although some may say the land outlined in the *Citizens' Wilderness Proposal* has been too heavily used over the years to be considered for wilderness, the Wilderness Act defines wilderness as "an area of undeveloped federal land retaining its primeval character and influence...which *generally* appears to have been affected *primarily* by the forces of nature, with the imprint of man's work *substantially* unnoticeable" [emphasis added]. This definition contains qualifiers ensuring that wilderness designation does not require pristine conditions, but simply predominantly natural conditions. The "ecological capacity" of wilderness in the eastern United States is thus characterized by Haney et al. (1999): "it is possible for an ecosystem to have low integrity (due to recent degradation) but high capacity so long as restoration is feasible. This situation is typical of Eastern wilderness areas, most of which consist of lands previously harvested, tilled, or otherwise altered by human use." In fact, the Wilderness Act, Eastern Wilderness Areas Act, and the 1978 Endangered American Wilderness Act all codified that areas previously influenced by man's works should not be precluded from consideration for wilderness designation.

Protecting all of the areas identified by FAW would not eliminate, or even significantly reduce, timber harvest or affect the timber-based economy. Only a fraction of the total ANF landbase is proposed for wilderness designation. This is an even smaller fraction of the total public forestland in Pennsylvania, and far less even of the 17 million acres of forest within the Commonwealth as a whole. Most of the acreage identified as prospective wilderness in the *Citizens' Wilderness Proposal* already has varying levels of protection through legislative and administrative designations and classifications, therefore there is little to no commercial timber harvest performed in most of these areas. Indeed, their permanent protection will provide a regionally rare attraction for hunters, anglers, hikers, birders, photographers, and others, prove a steady economic boon to the region for generations to come, and greatly help the biological capacity of the ANF over time.

We the undersigned endorse the eight areas and 54,460 acres outlined in the *Citizens' Wilderness Proposal for Pennsylvania's Allegheny National Forest*, published in 2003, as an ecologically and economically sound course of action for the United States Congress to take. With the current boom in oil and gas drilling throughout northwestern Pennsylvania and beyond, the need is even more urgent today than it was in 2003. We urge the Pennsylvania Congressional delegation to act on this matter as expeditiously as possible.

Sincerely,

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