



NATIONAL PARK SERVICE

FINDING OF NO SIGNIFICANT IMPACT

Oil Region National Heritage Area
Management Plan Augmentation /Environmental Assessment
Venango and parts of Crawford County, Pennsylvania

INTRODUCTION

In 2004 the US Congress passed Public Law 108-447 that created the Oil Region National Heritage Area to recognize the historic, cultural and natural resources related to the discovery and production of Oil in this part of Northwestern Pennsylvania and the resources importance to the nation's history. The Act directed the management entity of the heritage area to develop a management plan in coordination with the Secretary of the Interior that presents comprehensive strategies and recommendations for conservation, funding, management, and development of the heritage area.

The purpose of the act was to enhance a cooperative management framework to assist the Commonwealth of Pennsylvania, its units of local government, and area citizens in conserving, enhancing and interpreting the significant features of the lands, water, and structures of the Oil Region, in a manner consistent with compatible economic development for the benefit and inspiration of present and future generations in the Commonwealth of Pennsylvania and the United States.

The Oil Region was designated a Pennsylvania State Heritage Area in 1994 and originally had a management plan completed in that year. Prior to the area's national authorization in 2004 a major update was completed to the management action plan. Over the past two years through a planning process with assistance from the National Park Service, the 2004 management plan has been augmented to comply with federal requirements and to reflect its larger importance and potentials, and take into consideration the increased opportunities in the region.

The Management Plan Augmentation and Environmental Assessment (MP/EA) was prepared to evaluate management alternatives for the Oil Region National Heritage Area. It was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), and its implementing regulations (40CFR 1500-1508), and Director's Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision Making*, and its accompanying Handbook, which are the NPS implementing regulations for NEPA.

The MP/EA addressed the following goals and issues:

Goals

These are the goals of the plan that needed to be considered as directed by the Act which were considered in the alternatives:

- Present comprehensive strategies and recommendations for conservation, funding, management, and development of the Heritage Area;
- Take into consideration existing state, county, and local plans and involve residents, public agencies, and private organizations working in the Heritage Area;
- Include a description of actions that units of government and private organizations have agreed to take to protect the resources of the Heritage Area;



- Specify the existing and potential sources of funding to protect, manage, and develop the Heritage Area;
- Include an inventory of the resources contained in the Heritage Area, including a list of any property in the Heritage Area that is related to the themes of the Heritage Area and that should be preserved, restored, managed, developed, or maintained because of its natural, cultural, historic, recreational, or scenic significance;
- Describe a program for implementation of the management plan by the management entity, including plans for restoration and construction, and specific commitments for implementation that have been made by the management entity and any other persons for the first 5 years of implementation;
- List any revisions to the boundaries of the Heritage Area proposed by the management entity and requested by the affected local government;
- Include an interpretation plan for the Heritage Area.

Issues

1. Water quality. The concern was for projects that adjoin rivers and/or creeks to insure that proper methods to protect the environment are used. These might include erosion control, protection of water quality from run-off, and adherence to any state permit requirements.
2. Landscape preservation – a concern was expressed that landscape quality along riverfronts be protected, as well as visual character of ridgelines to protect views from intrusion from inappropriate structures, such as cell towers.
3. Public access to key resources – a concern was expressed that public access be maintained particularly along edges of area rivers and water bodies.

SELECTED ALTERNATIVE

The MP/EA examined three alternatives (1) No Federal Action (Retain current management plan); (2) Modify current plan to **expand preservation and economic development program** to address opportunities across the region; (3) Modify current plan to **focus preservation and economic development activities on historic district communities and corridors linking them** (the selected alternative). Based on the analysis presented in the MP/EA, Alternative 3 has been selected for implementation. The Selected Alternative is described on pages 14-16 of the MP/EA.

The selected alternative incorporates most of the actions cited in Alternative 2 but it adds significant preservation and economic development assistance focused on strategic investments in the region's core communities, along Oil Creek State Park, and toward the linkages that connect these resources. Here is how the Selected Alternative addresses the issues:

- **Resource Protection** - Resource documentation assistance targeted to the core regional communities of Titusville, Oil City, Franklin and Emlenton
- **Community Planning** - Emphasis on planning assistance to core communities, including Main Street efforts, charrettes, and /or preservation and revitalization plans. A specific initiative aimed at smaller communities – perhaps on a demonstration basis in one locale, would be consistent with this approach.
- **Technical Assistance** - Building conservation technical assistance focused on specific implementation projects within the core communities, but with parallel efforts to communicate findings and results of these efforts, in order to make lessons learned available to other comparable projects.
- **Education Programs** - Education and recognition programs that provide assistance to large and small communities as well as to other entities in developing innovative curricula, marker programs, etc.
- **Partnerships for Rehabilitation** – ORA investment/partnerships in projects – potentially including loans and/or grants that are tied to specific revitalization strategies within the core communities. Examples would include projects comparable to the Town Square effort in Titusville in other communities, support



for unique accommodations facilities in core areas, and a "This Old House" program within a NRHP district.

OTHER ALTERNATIVES CONSIDERED

The other alternatives considered were Alternative 1 – *No Federal Action (retain current management plan)*, described on pages 11-12 of the MP/EA, and Alternative 2 – *Modify Current Plan to Expand Preservation and Economic Development Program to Address Opportunities Across the Region*, described on pages 13-14 of the MP/EA. Alternative 1 assumes that there would not be further federal funds for coordination, interpretation, preservation and development purposes. This alternative would include mostly action by non-federal entities – the state, region localities, private entities and the ORA. This alternative has significant attention paid to recreation development and interpretation elements as they relate to core sites within the region. Alternative 2 does assume a federal role and then builds on Alternative 1 to represent an opportunistic approach to preservation and economic development that would orient towards potential projects across the entirety of the NHA where ORA would partner with willing owners or cooperating public entities. This approach would modify the current plan by developing regional technical assistance tools and methods that would be widely useful across the region.

Neither of these alternatives were chosen as the selected alternative because in the case of Alternative 1 there was an assumption that there would be no federal support, and the area is already receiving an annual appropriation from the US Congress for preservation projects and programming; and in alternative two, because it does not add significant preservation and economic development assistance focused on strategic investments in the region's core communities, it was determined this would not be as beneficial in terms of the historic preservation challenges in the region.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferred alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferred alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

The Selected Alternative is the environmentally preferred alternative because it attains the widest range of beneficial uses of the environment without degradation, risk or health or safety, or other undesirable and unintended consequences. Action is focused on reinforcing already urbanized areas, preserving natural and agricultural lands. The selected Alternative would result in the highest beneficial impacts on cultural and historical resources.

After a careful review of potential impacts to natural, historic and cultural resources, the visitor's experience, site operations and socioeconomic resources, the preferred alternative strikes the optimum



balance between the necessities of protecting the area's resources with the need for enhancing the visitor's experience.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.

There are no major adverse or beneficial impacts identified with the selected alternative that will require analysis in an environmental impact statement. The selected alternative will have moderate long-term beneficial impacts on historic structures and the cultural landscape.

Natural and ecological resources will not experience any adverse effects as a result of alternative 3 being implemented. Visitor experiences will have moderate long-term beneficial impacts in the selected alternative.

2) The degree to which public health and safety are affected.

Public health and safety are not expected to be affected by the selected alternative.

3) Any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

As described in the MP/EA the selected alternative would protect unique historic and cultural resources related to the important history of this region as the birthplace of the modern oil industry. No wetlands, floodplains or ecologically critical areas would be adversely affected.

4) The degree to which impacts are likely to be highly controversial.

There were no highly controversial effects on the quality of the human environment identified during either scoping, preparation of the MP/EA or the public review period. The results of public scoping and public review indicate a high level of support from individuals, organizations and communities interested in the study area.

5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

There were no highly uncertain, unique or unknown risks identified that would affect the quality of the human environment during the preparation of the MP/EA or the public review period.

6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The actions associated with the selected alternative will not establish a precedent for NPS future actions with significant effects nor represent a decision in principle about a future consideration.

7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

As described in the MP/EA, there could be moderate beneficial impacts from implementation of the preferred alternative related to visitor use and experience, historic preservation, site operations, and the



socioeconomic environment. In combination with other similar efforts throughout the region, as described on page 49 of the MP/EA, these could result in net minor to major beneficial cumulative impacts.

8) The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

Consultation on cultural resources has been completed in accordance with Section 106 of the National Historic Preservation Act. The Oil Region Alliance had regular interaction with Ms. Cutler (the current Pennsylvania SHPO) as well as with other staff in the Bureau of Historic Preservation, including M. Scott Doyle, Bryan Van Sweden, and William Callaghan. Over the course of the Environmental Assessment process, these personnel were made aware of the plan amendment/EA process, were directed to the management plan website where draft materials were routinely posted, and tracked the progress of the work, especially the Preservation sections of the Plan and the EA. No specific questions, comments, or further suggestions were made by these personnel.

9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.

No adverse impacts on endangered or threatened species or their critical habitats were identified during the preparation of the MP/EA, nor were any commented upon during the public review period. During the course of the planning and environmental assessment process, the preparers requested, by letter, input regarding state and federally endangered plants and species. Following this correspondence, the preparers consulted by phone with Ms. Kierstin Carlson, Conservation Data Manager of the Western Pennsylvania Conservancy/Pennsylvania Natural Heritage Program. Ms. Carlson provided correspondence to which was attached the current lists of Pennsylvania Species listed in the U. S. Fish and Wildlife Service Threatened and Endangered Species System that have existed within the area that includes the Oil Region National Heritage Area, as well as comparable Plant and Species lists from the Pennsylvania Natural Heritage Program Database.

10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

Implementation of the preferred alternative is not expected to violate any federal, state, or local environmental protection laws.

IMPAIRMENT

The National Park Service Organic Act of 1916, and related laws, mandates that the units of the national park system must be managed in a way that leaves them “unimpaired for the enjoyment of future generations”, and Director’s Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. However, the Oil Region National Heritage Area is an authorized national heritage area, not a unit of the national park system. Therefore, no impairment determination is required.

PUBLIC INVOLVEMENT

The Management Plan Augmentation/EA was started in November of 2005 and continued through 2006. The work was directed by staff of the Oil Region Alliance of Business, Industry, and Tourism and was



conducted by a consultant team headed by ICON architecture, Inc. The National Park Service Northeast Regional Office in Partnership Programs provided assistance throughout the planning process.

The Process started with over a dozen stakeholder meetings, located in all the principal communities of the region with a wide list of invitees to identify key issues, concerns, and ideas.

The work was organized around a series of three public meetings, each advertised in local media and supplemented with follow-up mail and email invitations to current and prior participants.

- The first public workshop was held in December 2005 to present the schedule and work plan as well as to identify concerns about the plan and its impacts. This meeting served as the “scoping” meeting for the Environmental Assessment.
- The second public workshop, held in February 2006, presented initial findings regarding the preservation element of the plan as well as alternatives for review and comment.
- At the third public workshop, held in May 2006, final recommendations were presented prior to publication of the Management Plan Augmentation and the highlights from the Environmental Assessment were shared with the public.

Additionally, the consultant team, with review and oversight from ORA staff, prepared a project website where general information about the process was available and where interim study documents were posted to enable review and comment by the public.

The complete Management Plan/Environmental Assessment was released for a 30+-day public comment period beginning September 4, 2006 and ending at noon on October 16, 2006. The complete documents were available for in-person review at the Franklin Public Library, Benson Memorial Library in Titusville, and the Oil Region Alliance office in Oil City. The complete documents were on-line at www.oilheritage.com and on the National Park Service's Planning, Environment and Public Comment website as project #16804 at <http://parkplanning.nps.gov>. Legal notices announcing this public comment period were published in the following area newspapers: The Progress News -- September 12 and 19, 2006; The Derrick -- September 6 and 7, 2006; The News-Herald -- September 6 and 7, 2006; The Meadville Tribune -- September 8 and 9, 2006; The Titusville Herald -- September 8 and 9, 2006; and The Erie Times-News -- September 6 and 7, 2006. A news release was issued to regional media announcing this public comment period on September 4, 2006. Direct notices about this public comment period were sent to interested parties on September 14, 2006.

During the September 4 - October 16, 2006 comment period, only two written comments were received by the Oil Region Alliance; both were submitted by members of the Board of Directors for the Oil Region Alliance. Both changes were made to the MP/EA as requested.

On September 22, 2006 during a meeting of the Oil Region Alliance Heritage Advisory Council, Neil McElwee (oil historian and author) requested a substitution in the narrative and the monetary charts regarding canoe access facilities envisioned to be developed along the Allegheny River within the Oil Region. He suggested deleting the access at President Township (for which in 2006 the private property owner asked that development efforts be ceased) and the insertion of access in Oil City, Pennsylvania; the dollar values and timelines assigned to this project would remain unchanged. His recommendation was followed; the Oil City canoe access is now mentioned throughout the ORNHA MP/EA documents.



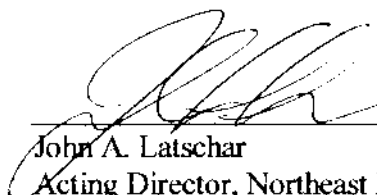
On October 2, 2006, Barbara Zolli (administrator of the Drake Well Museum and other oil-related historic sites in the area owned and managed by the Pennsylvania Historical and Museum Commission) requested a minor wording change on Page 4 of the Executive Summary Technical Report. Her recommendation was followed.

FINDING OF NO SIGNIFICANT IMPACT

Alternative 3, *Modify current plan to focus preservation and economic development activities on historic district communities and corridors linking them* has been selected for implementation. The selected alternative is described on page 23 of the Management Plan Augmentation/Environmental Assessment. The selected alternative will not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared.

Approved:


John A. Latschar
Acting Director, Northeast Region
National Park Service


Date



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

March 13, 2007

Randy P. Seitz
Oil Region Alliance
P.O. Box 128
Oil City, PA 16301

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 07-1125-042-A
NPS: Oil Heritage Region Management Plan Augmentation Environmental
Assessment and Technical Reports, 2006, Crawford and Venango Counties

Dear Mr. Seitz:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

We have reviewed the above referenced reports. These reports clearly emphasize the historic properties within the Oil Region as key to the interpretation of the Heritage Area. All the alternatives outlined in the reports recognize the importance of the identification and preservation of historic properties and includes initiatives to forward these goals. While both Alternatives 2 and 3 enable the Heritage Area to extend these initiatives with the use of federal funds, Alternative 3 appears to be more focused and therefore may be a more effective approach. We support the preservation programs and policies outlined in the Management Plan Augmentation, 2006 and look forward to providing assistance to the Oil Region Alliance.

If you need further information in this matter please consult Ann Safley at (717) 787-9121.

Sincerely,

Douglas McLearen, Chief
Division of Archaeology & Protection

DMcL/ras



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

July 23, 2007

Marilyn Black
Oil Region Alliance
206 Seneca Street, 4th Floor
Oil City, Pennsylvania 16301

Dear Ms. Black:

RE: USFWS Project #2007-2002

Dear Ms. Black:

This responds to your letter of March 15, 2007, requesting information about federally listed and proposed endangered and threatened species within the area affected by the proposed Oil Region National Heritage Management Plan, including Venango County and part of eastern Crawford County, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), and the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended; 16 U.S.C. 668-668d).

The Oil Region National Heritage Area was established by Congress in 2004. An environmental assessment has been prepared to address the effects of implementing the Oil Heritage Region Management Plan, whose purpose is to improve tourism and interpretive products, encourage economic revitalization, and take advantage of the region's assets. The EA evaluates three alternatives: Alternative 1 – no federal action; Alternative 2 – modify current plan to expand preservation and economic development program to address opportunities across the region; and Alternative 3 (preferred alternative) – modify current plan to focus preservation and economic development activities on historic district communities and corridors linking them. Federal funding and technical assistance is contingent upon plan approval by the Secretary of the Interior.

The preferred alternative provides for a regional recreational trail system along the Allegheny River and elsewhere in the Oil Heritage Region, as well as more intense use of the Allegheny River for boating and fishing. It also recommends the addition or expansion of facilities, including museums, visitor centers, and lodging accommodations, as well as preservation of historical buildings.

FEDERALLY LISTED SPECIES

The Oil Heritage Region is located within the range of the federally listed, threatened bald eagle (*Haliaeetus leucocephalus*), endangered Indiana bat (*Myotis sodalis*), endangered clubshell (*Pleurobema clava*), endangered northern riffleshell (*Epioblasma torulosa rangiana*), and threatened small-whorled pogonia (*Isotria medeoloides*). Adverse effects to these species could result from project activities that are proposed to occur in or near their habitat. Bald eagles are known to nest along the Allegheny River, and also in the vicinity of other large waterbodies, including wetlands, streams, rivers, and reservoirs in Crawford and Venango Counties. Bald eagles are vulnerable to human disturbance near their nesting and roosting areas, and could therefore be affected by trail construction and use, increased boating, and other activities. Endangered mussels are vulnerable to activities that affect the stream substrate or water quality, such as dock and boat ramp construction, bridge construction, in-stream gravel removal, and activities in or near the riparian corridor that contribute sediment or pollutants to the waterway. The Indiana bat and small-whorled pogonia are vulnerable to activities that disturb forest habitat.

The maps included in the EA were not detailed enough for us to determine whether proposed activities would affect known occurrences of federally listed species. Please access the PNDI Project Planning Environmental Review tool on the Pennsylvania Natural Heritage Program's website (www.naturalheritage.state.pa.us) to screen individual proposed projects for potential impacts to species of special concern, including federally listed and proposed species. Projects that exceed one mile in length or affect more than 1,000 acres are considered "large projects", and as such cannot be reviewed using the environmental review tool; submit these projects directly to our office for review, rather than using the online screening tool.

Review of individual projects is necessary to identify potential conflicts, and to ensure that implementation of the Oil Heritage Region Management Plan will not adversely affect federally listed species. This review is necessary for projects that will result in earth disturbance, or a change in or modification to an existing land use (e.g., converting an abandoned railroad line to a recreational trail, adding boating facilities).

Bald eagle

On July 9, 2007, the Fish and Wildlife Service published a final rule removing the bald eagle from the federal *List of Endangered and Threatened Wildlife* (*Federal Register*, Vol. 72, No. 130). This rule is effective August 8, 2007, at which time the bald eagle will no longer receive protection under the Endangered Species Act. However, it will continue to be protected by the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act (MBTA). Both acts protect bald eagles by prohibiting killing, selling or otherwise harming eagles, their nests or eggs. The Eagle Act also protects eagles from disturbance.

On June 5, 2007, the Service released several important documents related to the protection of bald eagles under the Eagle Act, including 1) a final rule establishing a regulatory definition of "disturb"; 2) a final environmental assessment of the "disturb" regulation; 3) National Bald Eagle Management Guidelines; and 4) a proposed rule to establish a permit for the take of bald and golden eagles. The proposed rule would establish regulations for issuing permits to take bald

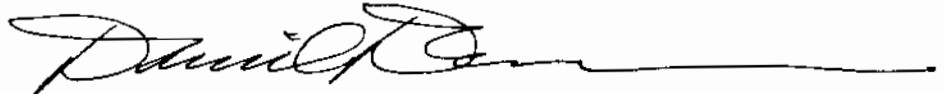
and golden eagles where the take is associated with, and not the purpose of, otherwise lawful activities. A second permit type would provide for permits to take bald and golden eagle nests for safety emergencies (of humans or eagles). All of these documents can be found at our web site at <http://www.fws.gov/migratorybirds/baldeagle.htm>.

The Service developed the National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the Eagle Act may apply to their activities. Adherence to the Guidelines will benefit individuals, agencies, organizations, and companies by helping them avoid violations of the law.

Please use the above-referenced USFWS project tracking number in any future correspondence regarding the Oil Region National Heritage Area Management Plan.

Please contact Carole Copeyon of my staff at 814-234-4090 if you have any questions or require further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "David Densmore", followed by a long horizontal line extending to the right.

David Densmore
Supervisor



July 31, 2007

Mr. Peter Samuel
National Park Service, Northeast Regional Office
200 Chestnut Street
Philadelphia, PA 19106

RE: Oil Region National Heritage Area, in Pennsylvania
Augmentation to the Management Plan, 2006 (including Environmental Assessment)

Dear Mr. Samuel:

This letter summarizes our communications with the Seneca National Tribal Historic Preservation, and specifically Ms. Kathleen Mitchell, Tribal Historic Preservation Officer, with regard to the 2006 Augmentation to the Management Plan for the Oil Region National Heritage Area.

Early in 2006, the study consulting team of Icon Architecture notified Ms. Mitchell that the Oil Region National Heritage Area (comprised of Venango County plus the City of Titusville and Oil Creek Township in Crawford County, within Pennsylvania) was accepting public comments and invited input regarding the augmentation of its Management Plan, particularly to reflect new responsibilities upon having been designated as a National Heritage Area.

Your March 1, 2006 letter to Icon Architecture requested a hard-paper copy of the draft Environmental Assessment, and requested consultation opportunities as well as continued updates regarding any associated plans for this area.

Mrs. Marilyn Black, ORA's Vice-President for Heritage Development, provided the hard-paper copy and notified the National Park Service of the request for consultation opportunities. NPS indicated that the sovereign Seneca National's consultation would need to occur at a much higher level within the U. S. Department of the Interior.

On September 4, 2006, the Oil Region Alliance announced that final public comments received in writing by noon on October 16, 2006 would be included in the final published Augmentation to the Management Plan and Environmental Assessment. This public notice was sent directly to Ms. Mitchell and to anyone else who had provided earlier written comments.

On January 17, 2007, although no further comments had been received from the Seneca Nation, Mrs. Black sent a printed final version of each of the plan sections to Ms. Mitchell along with background information related to the "Finding of No Significant Impacts" review by the National Park Service.

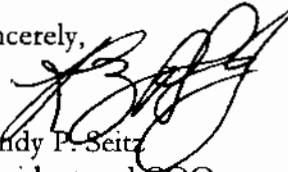
On March 24, 2007, Mrs. Black sent another letter to Ms. Mitchell, indicating that "since we have not received any questions or other comments from you or other representatives of the Seneca Nation, we will interpret that to mean you agree there are no negative significant impacts presented in those plan documents." Mrs. Black's letter also indicated that ORA will keep Ms. Mitchell's office informed of any specific projects involving key natural or cultural resources of special interest to the Seneca Nation.

As of today, we confirm that we still have not received any questions or other comments from Seneca Nation representatives, so we further presume that the recipients are not anxious to meet for direct consultation at this time.

Copies of the various items of correspondence are available upon request; please contact Mrs. Marilyn Black, (814) 677-31532, Extension 105, mblack@oilregion.org directly for such documentation.

We look forward to the NPS determination of FONSI with regard to our augmented Oil Region National Heritage Area Management Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Seitz', written over a horizontal line.

Randy P. Seitz
President and COO

cc - Marilyn Black