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Title:

Comments: Defenders of Wildlife's Comments on Wayne NF Pre-Assessment

Dear Lisa Swiderski:

Thank you for the opportunity to contribute to the development of the Wayne National Forest (WNF) forest plan revision assessment. This letter is in response to the Notice initiating the assessment phase of the forest plan revision for the WNF (83 FR 17359), and its invitation to participate in the development of the assessment. We are providing information about ecological conditions important to wildlife species that we have identified as a priority for management. We offer suggestions on the assessment process that we believe will both improve conservation outcomes and help fulfill the obligations for forest planning.

Developing and implementing robust, science-based forest plans under the 2012 Planning Rule (planning rule) (36 C.F.R. § 219) will result in public confidence that the Forest Service is fulfilling its mission and conservation obligations and enabling integrated landscape-level decision making and more efficient project-level implementation.

These comments draw from Defenders of Wildlife's extensive history of engagement in the development and implementation of the 2012 Planning Rule, particularly the contents of our three publications on forest planning, wildlife and habitat, all of which are attached as appendices to our main comment letter <DefendersofWildlife-WayneNF-PreAssessment.pdf>:

1. Planning for Diversity
2. Planning for Connectivity
3. Planning for Climate Change (draft)

The assessment should present information provided by the forest plan and other monitoring and other data collection to allow the responsible official and interested parties to identify how current conditions and trends can be influenced directly or indirectly by Forest Service management, and based on this, identify specific needs for change in plan components. The assessment should therefore seek to answer relevant questions focused on the "need for change." This should focus on experience with the current plan and provide the basis for evaluating whether specific direction should be changed. The assessment should be forward-looking, anticipating future stressors, such as those driven by climate change, and facilitating projections of future trends in the condition of the plan area.

Our comments are comprised of the following sections:

1. Authority of Forest Service to Manage Wildlife
2. Best available scientific information
3. Assessing "Diversity of plant and animal communities"

Step 1: Which federally protected, potential species of conservation concern, and potential focal species occur in the forest?

Step 2: What are the ecosystems and habitat types that exist across the forest?

Step 3: What are the key ecosystem characteristics and ecological conditions that are necessary for at-risk species?

Step 4: What key areas support target species?

Step 5: What conditions and trends are necessary for evaluating ecological integrity?

Seven questions on past, current and future conditions

4. Appendix 1: State Listed Animals and Species of Concern
5. Appendix 2: State Listed Plants

Please let us know if you have any comments or questions regarding the content of this letter. We look forward to working with you on the next phase of the forest plan revision.

Sincerely,

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Lauren McCain, Senior Federal Policy Lands Analyst
Aimee Delach, Senior Policy Analyst {{and local contact: adelach@defenders.org}}

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