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(PLANNING RULE)

To all persons concerned: Please add this page to my previous comments regarding the New Planning Rule.
Thank You.

I just wanted to explain that I utilized the "new" proposed draft Planning Rule- as a "Blueprint" in an attempt to adapt its specified SECTIONS to find ways in which to legally begin to solve the expressed (3) concerns. I must state that with all three of the cases presented our org. felt that the problems could very well be examined and dealt with using the New Planning Rule •(-N--P-R) when applied.

With the 1st concern- I remarked on how certain SECTIONS of the (NPR) would serve to help solve this problem, that needs to be inspected and monitored.

The 2nd concern- Reflects the need to "emphasize" certain SECTIONS of the (NPR) at our Forest. Especially in regards to the rivers and their ecosystems (which in the case of EYNF extend outside the supposed Forest limits) but that are hydrologically connected to the Forest via riparian means.

The 3rd concern- the SECTION I mentioned here is in regards to maintaining the populations of native and desired species. This concern alone should be enough to move our (EYNF) to obtain help immediately. Never mind when a situation exists that might lead to a Health problem also.

Again we state that if this (NPR) is accepted and utilized correctly in P.R. it will serve as a great new tool-to further help and protect our (EYNF)!

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May 11, 2011

PLANNING RULE)

Dear members of the USFS, USDA and all concerned regarding the new NFMA Planning Rule. My name is Diana de Ju and I was born and live here in the Luquillo mountain range foothills of the "El Yunque National Forest" (EYNF). I've been serving as a volunteer for the past 15 years at the (EYNF) and also as the

coordinator of Humane Education for the PARE ESTE Inc. (Animal Welfare Organization). We try to protect and legislate towards the well being of the animals and endangered species in Puerto Rico. For their welfare and also the harmony, well being and health of our citizens- especially the youth of our island. I was glad to participate in the March 31 video conference at the (EYNF) Catalina Center. I will now humbly attempt to submit my (3) formal comments regarding the Proposed Rule, to be considered and become part of the record for the "Final Planning Rule".

Comment # 1

On certain occasions our meditation group (after obtaining all the required permissions) has hiked up the trails and stayed overnight at various peaks in our (EYNF). I wish to comment regarding the area called "Pico El Yunque" or El Yunque Peak. This is without doubt one of the most beautiful areas of our (EYNF). The problem here is that there exists an almost unbearable "noise pollution" and probable emission of damaging rays which are coming from the generators and Telecommunications Towers etc. that have been in constant use there for over 50 years (due

to its almost hidden distance from the public eye). I understand that no truly valid studies have been conducted regarding this situation. The monitoring and follow-up are almost nonexistent. The fact is whatever arrangement was agreed upon over 50 yrs. ago should be re-evaluated and new (EIS) studies done, since at present so much scientific knowledge is surfacing regarding this type of potent and dangerous emissions and their probable negative catastrophic long range effects on the biodiversity and species that still live here.

In Section 21 9.5 Planning Framework- There is a proposed New Framework which is science- based.

This would revise management plans, which "monitor changing conditions and effectiveness", with the assessment phase leading to identification of a potential need to change the units plan (shape a proposed action that would respond to the need for change). During the Implemented Monitoring Plan- the managers of the Monitoring Phase would receive "current data" to evaluate management actions and measure effectiveness, test assumptions (track changing conditions and make adjustments to both projects and to the land management plan

as needed, based on "...new information" and monitoring. This holistic approach offers the participation not only to the interested telecommunications parties and etc.- but also includes up-dated scientific and public opinion responding to the ecological conditions of this most

prized and pristine area. I also add that Section 219.12 recognizes the need for both unit level and broad scale monitoring. Section 219.5 refers to the development of "alternatives" based on issues learned through public collaboration.

Comment #2:

There are various pristine rivers that are born in the mountain tops of the (EYNF) which flow towards the coast and empty into the Atlantic Ocean. Some of these are the Mameyes River, Pitahaya River, Juan Martin Rivet and the Sabana River etc.

In Section 219.8 Sustainability:

The Plan must include plan components to maintain or restore the function, composition and connectivity of healthy terrestrial and aquatic ecosystems and watersheds. Also the potential: system drivers and stressors, disturbance regimes with their ability to adapt to change soil productivity (including guidance to reduce soil erosion and sedimentation). Regarding the Riparian areas- the plan must include components to maintain, protect or restore riparian areas. Plans must establish a default width for riparian areas around all streams or open water wetlands. (The width of such zones is usually measured from the edge of the water, extending outward to the adjacent upland areas). In regards to urbanization on lands outside or adjacent to NFS lands- the plan should establish planning processes for maintaining or restoring sustainable ecological systems and watersheds, to design plan components that are ecologically appropriate to the unit. The plan should include plan components to guide the management with riparian areas.

For example in the coastal reserve area between the towns of Fajardo and Luquillo known as the "North Eastern Ecological Corridor" the lands adjacent to these pristine rivers that flow from the (EYNF) there are species which need to travel down from the Forest to the coast and later return when their biological process is completed.

These lands adjacent to the rivers need further protection. So any construction or projects on those lands should be minimal and truly "Ecoturistic" in nature to maintain the sustainability and guide the management of

those areas, so as to ensure that they be ecologically appropriate. We feel that now more than ever the proper protection of our (EYNF) should be thought of as extending beyond their 28,000 acres to ensure the "entire protection and continuity" of all its delicately balanced eco-systems! . This means doing all possible to ensure the prevention of any harm that may affect its pristine waterways and rivers which contain a threatened unique and irreplaceable biodiversity which depends on and is part of the (EYNF).

Comment #J :

In the (EYNF) there has been for the past few years the documentation of increased numbers of Mongoose which are invading the Forest and are "testing positive" for the Rabies Virus. To add to this problem since there are no "Animal Shelters" in the periphery of the (EYNF) there has been an increase of stray dogs and cats also invading the Forest since many are sadly thrown there when they are no longer wanted. This is one of the problems that was addressed in 2005 at the P. R. National Forest Conference. The outcome was that the local government was told that

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they should provide an (Animal Shelter) to address this "ISSUE"- but until now this has not occurred. Obviously a Rabies threat is eminent and this situation could present a future public health problem, especially to the many locals and tourists which visit our (EYNF). In various

Public Forums regarding land use etc. we have also officially informed the P.R. government . entities of this situation, the possible consequences and the immediate need for an Animal Shelter in the periphery of the Forest, to help solve and control this eminent danger and provide the Humane Education that's needed to inform the citizens so as to obtain their help and cooperation. Till now we have received no answers.

Section #219.9 maintains viable populations of existing native and desired non-native species.

The stray cats or dogs which are in the Forest should be humanely dealt with, since they present a problem to the native species.. For example they would not think twice about eating any species or the eggs of the endangered Puerto Rican Parrot- to keep alive when hungry. This does not contribute to the recovery of T&E species besides the possibility of visitors possibly being molested by sick invasive animals and or mongoose. We must work together to find a solution to this threatening problem. In this case the U.S. Forest Service/ Agriculture Dept/even entities from the U.S. Gov't. should again stress to the P.R. Gov't. the need to cooperate and simply make an Animal Shelter in the (EYNF) periphery. To help not only address this ISSUE

but also to serve as an alternative to the communities- where these innocent animals can be brought to be adopted or humanely dealt with and not discarded in the Forest, and other help sources may also be obtained. This is where the F.S. recognizes the limits of their authority but also "stresses the participation of the local government" in solving and preventing this possible Rabies threat to their communities.

We thank you for allowing us to be part of this decision making process and hope that the F.S. is able to help with the concerns which were presented while finishing the new Planning Rule. We love our (EYNF) and maintain high hopes that with time it will be even more fully protected. For the enjoyment of the many tourists which visit and of course for the benefit of our citizens and children which have come to deeply love this unique patrimony. We also wish the other Forest Services much luck in dealing with their different problems since all the Forests are a blessing and need to be maintained for future generations!