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Comments: I just attended today's webinar, and I have a couple of comments I would like to submit based on that.

The agency's answer to a question about species of conservation concern (SCC) was incorrect in indicating that identifying them could be deferred to revision of individual forest plans. The planning regulations require that substantive requirements like SCC be addressed for amendments that are directly related to them (36 CFR§219.13(b)(5)), which would clearly be the case here. Moreover, scoping should have specifically requested information about potential adverse effects on potential SCC (36 CFR§219.13(b)(5)(ii)), so that the need for at least potential SCC identification could occur pursuant to 36 CFR§219.13(b)(6). In addition, since SCC will be needed for revision of forest plans, which since they are so long overdue we must assume will follow shortly after this amendment, there is no reason the regional forester should not identify them concurrently with this amendment. None of this is addressed in the NOI.

While the Northern Spotted Owl Recovery Plan was cited as new information in the NOI, it was not mentioned in the presentation today. This suggests that even though the amended forest plans must contribute to recovery of spotted owls (36 CFR §219.9(b)(1)), the Recovery Plan is not viewed as a critical component of this amendment where spotted owls are a (the) key component. Forest plans are the Forest Service actions that most lend themselves to the agency demonstrating compliance with ESA's §7(a)(1) requirement to recover listed species. I would expect to see the Recovery Plan as a driving force for this amendment, including documentation of how the agency is responding to the relevant elements of the Recovery Plan.

Thank you for the presentation and this opportunity.