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Organization: U.S.Department of the Interior

Title: Regional Environmental Officer

Comments: Re: Comments and Recommendations on the Draft Environmental Impact Statement (EIS)

for El Yunque National Forest Plan Revision, Puerto Rico

Dear Mr. Rios:

The United States Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (EIS) for El Yunque National Forest Plan Revision, Puerto Rico. We offer the following comments for your consideration.

National Landmarks

The El Yunque National Forest contains a designated National Natural Landmark, Bano de Oro

Natural Area. Bano de Oro Natural Area, it is not identified as a National Natural Landmark in the Draft EIS. The Bano de Oro Natural Area was designated a National Natural Landmark in

1980 and encompass nearly 1,700 acres. Containing virgin forest, Bafio de Oro Natural Area is the only contiguous area in Puerto Rico that contains subtropical wet forest, rain forest, dwarf forest, and Pterocarpus. The site also supports many endemic plant and animal species.

The National Natural Landmarks Program recognizes and encourages the conservation of sites that contain outstanding biological and geological resources. Sites are designated by the

Secretary of the Interior for their condition, illustrative character, rarity, diversity, and value to science and education. The National Park Service administers the program and works cooperatively with landowners, managers and partners to promote conservation and appreciation of our nation's natural heritage. To date there are nearly 600 landmarks designated nationwide.

We recommend including this designation when discussing Bano de Oro Natural Area in the

Draft EIS. For more information regarding this significant designation please visit our website at www.nps.gov/subjects/nnlandmarks or contact Carolyn Davis, National Natural Landmarks Coordinator at (717) 338-4458, or email at carolyn_davis@nps.gov.

Moreover, the USDA Forest Service (USFS) is proposing to revise the Land and Resources Management Plan for the Caribbean National Forest and Luquillo Experimental Forest. The proposed action addresses the planning, collaborative, sustainability, social, economic, and ecological needs that have been identified in the draft revise Plan.

El Yunque Forest Plan Revision includes 3 alternatives, where Alternative 2 is the preferred alternative and proposed action. Alternative 2 addresses public access for recreation but recognizes carrying capacity of the area for visitation. It also addresses climate change impacts and monitoring of its effects. In addition, the USFS would improve desired conditions by developing standards and guidelines and management activities that would provide landscape connectivity.

According to the DEIS and information in our files, El Yunque National Forest harbors suitable habitat and populations for 14 federally listed species. The effects of proposed actions on those species should be evaluated in a Biological Assessment (BA). We acknowledge that USFS is drafting a BA for this project to address listed species and we have been providing technical assistance on that regard. Any site-specific project, action, or special permit with the potential of affecting federally listed species, and not covered by the BA will need an individual consultation under Section 7 of the ESA.

After reviewing the DEIS, we provide the following comments and recommendations:

1. The species mentioned in table 3-18 (federally listed fauna) and in Section 3.4.3.5 (federally listed flora) are all the currently listed species under our jurisdiction. There is no additional listed species to be included. The DEIS mentioned that the elfin-woods warbler is a proposed threatened species. The elfin-woods warbler is already listed as a threatened species since June 22, 2016 (81 FR 40534). We are currently working on the Final Critical Habitat designation for the species and it is expected to be finalized for June 2017. One of the proposed critical habitat units is within the El Yunque National Forest.
2. For the Department, [ldquo]at risk species[rdquo] is a terminology for species that have either been, petitioned for listing, are candidates for listing or are proposed for listing under the ESA; in addition to other species deemed as species of concern (species with low or declining populations) by the States or Territories. The DEIS only includes fauna (wildlife) as [ldquo]at-risk-species[rdquo]. We recommend the USFS reviews the list of at risk species develop during the workshop conducted in IITF in February 2016, and determines from that list the species that occur at El Yunque National Forest.
3. The DEIS frequently refers to the 2014 Forest Plan Assessment in regards to listed species and its habitat; however, there is no link to the document. We recommend providing a link to the document to be able to refer to it.
4. Alternative 2 proposed a recreation corridor- a scenic byway along PR Road 186 that would create recreational activities at lower elevations of the Forest. The DEIS suggests that this new scenic byway would help improve a variety of habitat for various species (including the sharp-shinned hawk) and provide a link between the Forest and the coastal region of northeast Puerto Rico since they would provide management efforts to restore ecological functions after a natural disaster. Based on the available information we cannot concur that the proposed action may benefit listed species (i.e., sharp-shinned hawk, broad-winged hawk, elfin-wood warbler) since these species are habitat specific (e.g., found in mature forest and bounded by elevation) and their range does not include coastal forest. In addition, as indicated in the DEIS, the scenic byway would increase vehicular use over time; thus, it is expected that there would be an increase in disturbance from vehicular and human presence in any rehabilitated recreation site. We recommend that this proposed action be carefully evaluated in the BA.
5. The latest information on the status of listed species may be found in the 5 year status review documents at <http://ecos.fws.gov/ecp/> or <https://www.fws.gov/southeast/5yearReviews/5yearreviews/>. This information would be useful for the development of the BA.

Thank you for the opportunity to provide comments on this project. It is our mission to work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of our people. If you have any questions or require additional information, please contact Maritza Vargas at (787) 851-7297, extension 215. I can be reached at (404)331-4524 or at joyce_stanley@ios.doi.gov.