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Comments: Comments on the Draft Management Plan for the El Yunque National Forest

Sheila Ward:

To the Team preparing the El Yunque Draft Management Plan:

First, I want to congratulate the team on an excellent product integrating inputs from so many groups and information sources. I also want to raise some points for your consideration. Points 6 and 7 were developed based on communications with Frank Wadsworth and Nicholas Brokaw.

1. The plan does not mention certain research projects that are not in the designated research areas. These would include- 1) genetic trial and gene bank for a large mahogany study, 2) the arboretum located near Carr. 186 3) long term study sites such as the 400 series plots, and the Palm, Colorado, and Tabonuco plots. It would be good for EYNF to have a registry with the locations of all study locations in the forest. The Management Plan could refer to this database, and it should be accessible to the planning team.
2. I think there needs to be an intent for more inclusivity for recreation opportunities for people with disabilities.
3. Pg. 30: It would be good to emphasize more the potential for recreational development in MA4 zones. Only dispersed camping is mentioned. I think there are areas in this zone that would potential for development as small group camping sites. I am not sure you actually want people camping anywhere in the forest on non-established or non-designated sites. High rainfall can result in high impacts, even in more level areas. The Asociaci[oaacute]n de Acampadores of Puerto Rico would be able to help evaluate areas for camping and hiking in MA4.
4. El Toro Wilderness Area: No mention is made of the LAC committee for the wilderness area that met in 2011. A final report was produced, which Jose Ortega should have. Several of points on Pgs 32-35 coincide with the recommendations of the LAC committee.
5. 3.2.2 Broader Landscape and Lands: Why are not lands along the Rio Mameyes outside of the forest perimeter also being considered for acquisition. This river has wild and scenic status within the forest, but no protection outside the forest boundary. It is about the most pristine river in Puerto Rico. In general, the protection of watersheds/riparian zones outside of the forest needs more emphasis.
6. I believe the draft plan needs to include a component on addressing research needs at EYNF. Forest managers will have an idea of further research needed to inform management. An outline or examples of these research needs should be included in the plan, with the general direction indicated and general prioritization of research needs. This would indicate that managers know that not all information is at hand, but a plan is at hand for progress. I believe that the plan should also include the intent to form a scientific advisory committee, to promote the agenda of needed research in the academic community. Intention for an efficient permitting process should also be indicated, to help the needed research move forward in a timely way.
7. The draft plan and the EIA have taken a detailed look at the information available on target species. But I think one of the priority research needs is more biological inventory, including geolocation and habitat characterization information, reproductive information, food dependencies, interspecific relationships. This is particularly true for the El Toro Wilderness Area, to know more about the occurrence and sustainability of sensitive species in relation to potential human use. More extensive inventory research would be ideal for undergraduate and graduate research projects and could be promoted by the scientific advisory committee suggested in Point 6, at various institutions in and out of Puerto Rico.
8. In general, the partnership needs to be better developed between EYNF and the academic community, in

addition to partnerships with local communities and other stakeholder groups.

9. 3.2.2 Broader Landscape and Lands [ndash] Objectives- should also list something about acquiring lands to protect the Rio Mameyes, and rivers other than the Rio Espiritu Santo.

10. Page 4 of the Environmental Impact Statement: The reasoning for not pursuing wild and scenic status for additional rivers in El Yunque is weak, it states that there is little public interest in this. I believe that the public is not conscious of this option.

11. Page 21 of the Environmental Impact Statement. I am sure there are more than 166 species of animals in EYNF. The arthropods probably need a lot more study.