

Appendix A

Issue Development

Introduction

The Land and Resource Management Plan (Plan) and the associated Final Environmental Impact Statement (FEIS) for the Caribbean National Forest were approved by the Regional Forester in February 1986. Some aspects of the Plan were controversial, and the Plan was appealed.

In response to public concern, the Regional Forester directed the Forest to suspend implementation of the timber harvest program set forth in the Plan. The Regional Forester further directed the Forest to explore possibilities for resolving the issues raised in the appeal through the preparation of a Supplement to the Plan/EIS.

A Draft Supplement to the Final Environmental Impact Statement for the Forest Land and Resource Management Plan (DSEIS) and Draft Amended Forest Plan were released for public comment in 1990. Several respondents to the DSEIS stated that they considered it inadequate because it did not evaluate the effects of Hurricane Hugo, which struck the Forest September 18, 1989. In response to these concerns a second draft supplement (Hugo Supplement) was issued. Public comment period for the Hugo Supplement closed July 31, 1991.

Following public comment on the Hugo Supplement the Forest's planning process was reviewed by the Regional Forester. He concluded it was more appropriate to address the changing situation through a revision of, rather than an amendment to, the Forest Plan. The Chief of the Forest Service authorized the Forest to revise the Forest Plan in July 1991.

Draft Revision

The Proposed Revised Plan and Draft EIS were released for public review and comment on March 17, 1995. The comment period extended through July 17, 1995. During this comment period we held community meetings, conducted briefings for government agencies, mayors and municipal assemblies, and participated in radio talk-shows. We took notes at the meetings and briefings and invited interested individuals, groups and agencies to send us written comments. The public involvement effort during the comment period is summarized in Table A-1.

Table A-1. Summary of Public Involvement Effort for the Proposed Revised Plan.

<u>Community Meetings/Open Houses</u>	<u>Radio Stations</u>
Río Grande Forest's Neighboring Communities	WKAQ Radio Reloj
Cubuy	WYQE Yunque 93
Fajardo	WMDD Fajardo
Río Grande	W11Q Santurce
Río Piedras	
<u>Municipal Assemblies/Mayors</u>	<u>Commonwealth Agencies/Offices</u>
Naguabo	PR Tourism Company
Fajardo	Resident Commissioner
Río Grande	Department of Natural Resources and Environment
Canóvanas	PR Aqueducts and Sewer Authority
Ceiba	PR Planning Board
<u>Environmental Organizations</u>	Fomento
PR Environmental Group Leaders	PR Department of Transportation and Public Works
Sierra Club Members (Forest Visitors)	PR Senate
National Environmental Group Representatives	Governor's Office
<u>Universities</u>	PR Department of Agriculture
Universidad Metropolitana	Environmental Quality Board
UPR, Río Piedras Campus	<u>Federal Agencies</u>
	US Fish and Wildlife Service
	US Corps of Engineers
	Food Agriculture Committee of USDA (FACA)
	USDA Natural Resources Conservation Service

The ID Team analyzed the content of written and verbal comments received in response to the Proposed Revised Plan and Draft EIS. These responses were used by the ID Team and the Forest's Leadership Team to determine changes to be incorporated into the Revised Plan and Final EIS. The 54 letter received in response to the Draft, and Forest staff responses to these letters are included in Appendix H of this EIS. Summary information on the letters is displayed in Tables A-2, A-3 and A-4.

Table A-2. Summary of Origin of Comments.			
<u>Where from</u>		<u>Who from</u>	
Puerto Rico	42	Individual	16
US Mainland	11	Academic	6
Other	1	FS Employees	4
		Env/Prof/Civil Orgs.	11
		Business Orgs.	1
		State/Local Govt.	10
		Federal Government	6
<u>Language</u>			
Spanish	30		
English	24		

Table A-3. Number of Letters Responding to Draft Revised Plan/EIS with Comments on Specific Issues.

<u>Issues</u>	<u># of Letters</u>
Timber Demonstration	27
Wilderness/Wild & Scenic Rivers	16
Primary Forest	9
Recreation	23
Wildlife	9
Water	14
Roads	15
Research	10
Special Uses	9
Law Enforcement	4
Lands/Inholdings	13
Heritage	3
Environmental Education	5
NEPA/NFMA	8
Edits	9
Other	7

Table A-4. Summary of Letters Stating Specific Position on Alternatives, Timber Demonstration and Highway 191.

<u>Stated Preference for an Alternative</u>				
A	B	C	D	Other
0	5	9	2	6
<u>Stated a Position For or Against the Timber Demonstration Proposal</u>			<u>Stated a Position For or Against Re-opening PR 191</u>	
For	Against		For	Against
10	9		5	8

Identification of Issues

The ID Team reviewed the following sources to determine the issues to be addressed in the revision of the Forest Plan:

- Issues identified in the FEIS.
- Public comment on the Draft EIS and Plan (published in the FEIS).
- Appeal of the current Plan.
- Public comment on the Draft Supplements.
- Comments and concerns expressed internally (i.e. Forest Service personnel) regarding the current Plan and its revision.
- Public response during during the revision process--ID Team meetings with plan appellants, public officials, and citizen groups.

Based on the review of these sources the ID Team identified 8 issues that indicated a need to consider change in the direction of the current Plan. A comparison of the issues guiding revision and the issues identified in the current Plan follow.

Draft Revision Issues

1. Demonstrating timber production while assuring compatibility with a diversity of other Forest values.
2. Recommendation of areas for Congressional designation of Wilderness, and Wild and Scenic Rivers.
3. Protection of primary forest.
4. Providing recreation opportunities while protecting the ecological values of the Forest.
5. Protection of wildlife while conducting other forest management activities.
6. Providing and protecting the Forest's water quantity and quality.
7. Providing and managing appropriate Forest access.
8. Meeting the needs of tropical forestry research while protecting the Forest's environmental values.

Final Revision Issues

The issues addressed in the Revised Plan and EIS are the same as in the Draft Revision Issues, except that for clarity, Draft Issue 2 was subdivided into a Wilderness Issue and a Wild and Scenic Rivers Issue. As a result, this FEIS include a total of 9 issues.

1. Demonstrating timber production while assuring compatibility with a diversity of other Forest values.
2. Recommendation of areas for Congressional designation of Wilderness.
3. Recommendation of areas for Congressional designation of Wild and Scenic Rivers.
4. Protection of primary forest.
5. Providing recreation opportunities while protecting the ecological values of the Forest.
6. Protection of wildlife while conducting other forest management activities.
7. Providing and protecting the Forest's water quantity and quality.
8. Providing and managing appropriate Forest access.
9. Meeting the needs of tropical forestry research while protecting the Forest's environmental values.

Current Plan Issues

1. How much and what quality of water should the Forest provide to meet present and future demands?
2. How much and what types of recreation opportunities should the Forest provide, and where?
3. How much land should be allocated to special uses, and what types should be permitted?
4. How should research activities and results be integrated with other multiple-use management of the Forest?
5. How much and what kinds of access should be provided on the Forest, and how should this access be managed?
6. How can violations of the law be reduced on the Forest and the health and safety of forest visitors be protected?

7. What should be the emphasis and activities of the Forest in managing wildlife resource?
8. What should be the emphasis and purposes for managing the timber resource on the Forest, and what silvicultural methods should be used?

Opportunities to Resolve Issues

Issue 1
Timber production demonstration

The ID Team confirmed that the demonstration of timber production remains a key planning issue.

The ID Team identified opportunities to address this issue through the development of alternatives that did not involve commercial timber sales, and through the development of alternatives which demonstrate sustainability and/or tropical forest silvicultural techniques, on less land and with fewer treated acres, than in the current Plan.

Issue 2
Wilderness

This was a new issue identified by the ID Team. Recommendation of areas for Wilderness study previously was identified as a facet of the recreation issue.

The ID Team identified an opportunity to address this issue through the recommendation of different proportions of the Forest for Wilderness designation.

Issue 3
Wild and Scenic Rivers

This was a new issue identified by the ID Team. Recommendation of rivers for inclusion in the National Wild and Scenic and River System was not addressed in the current Plan.

The ID Team identified an opportunity to address this issue through the recommendation of rivers for Wild, Scenic and Recreation designation.

Issue 4
Primary Forest

This is a new issue identified during the revision process. The source for this issue was primarily internal comment (International Institute for Tropical Forestry), but was also mentioned in some public comment on the DEIS/Plan.

The ID Team identified opportunities to address this issue through allocation of primary forest to different management areas with differing prescriptions.

**Issue 5
Recreation**

The ID Team's review of sources indicated that recreation remains a key planning issue. Three major facets of this issue were identified: providing more developed facilities to meet demand; addressing the lack of developed sites on the south side of the Forest; concern with effects of recreation development and use on sensitive forest organisms and ecological processes.

The ID Team identified opportunities to address this issue through allocation of the Forest to various management area mixes, and through different levels and locations of recreation development (including trails).

**Issue 6
Wildlife**

The ID Team confirmed that wildlife is a planning issue. As with the water issue, this issue has been refined to focus on the effects of other uses of the Forest on this resource.

The ID Team identified opportunities to address this issue through the analysis of the effects of existing and planned roads, trails, recreation development, research, and timber demonstration on wildlife habitat.

**Issue 7
Water**

The ID Team confirmed that water quality and quantity remains a planning issue.

The ID Team did not identify opportunities to affect the quantity of water produced by the Forest. The Team identified the designation of the Forest as a municipal supply watershed as a potential response to this issue, and identified water quality as a key measure of the environmental effects of management activities.

**Issue 8
Access**

The ID Team confirmed that construction of new roads and trails, and the management of existing ones, remains a planning issue.

The ID Team identified opportunities to address this issue through the development of alternatives with lesser amounts of road and trail construction.

**Issue 9
Research**

The ID Team confirmed that research use of the Forest remains an issue.

The ID Team identified opportunities to address this issue through allocation to management areas with research emphasis (including manipulative research), allocation to Research Natural Areas, as well as allocation to other management areas with varying degrees of emphasis on research.

**Consultation
with Others**

The Forest published a Notice of Intent to prepare an environmental impact statement on the proposed action to revise the Forest Plan in September 1991. This notice appeared in the Federal Register, and also in the local newspapers. Concurrently, more than 300 letters explaining the decision to revise the Plan were mailed to persons and organizations who have expressed interest in the Forest's planning process.

**Government
agencies
consulted
included**

- Municipal governments of the eight municipalities surrounding the Forest (Canóvanas, Ceiba, Fajardo, Juncos, Las Piedras, Luquillo, Naguabo, and Rio Grande).
- Commonwealth government agencies - Office of the Governor, Planning Board, Environmental Quality Board, and Department of Natural Resources.
- Federal government agencies - Environmental Protection Agency, USDA Office of General Counsel, and USDI Fish and Wildlife Service.

Indian Tribes

No officially recognized tribal organizations exist in Puerto Rico. However, a number of organizations which claim to represent indigenous Puerto Rican peoples (Taínos) and interests are seeking federal recognition.