



Government of Puerto Rico
Autoridad de Acueductos y Alcantarillados
Puerto Rico aqueduct & sewer authority

June 13, 1995

29

Mr. Robert Joslin
Regional Forester
USDA Forest Service
Southern Region
1720 Peachtree Road, NW
Atlanta, GA 30367

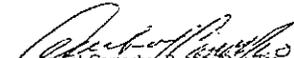
Dear Mr. Joslin:

As per your request, we are enclosing the following comments regarding the draft on the Environmental Impact Statement for the proposed Management Plan of El Yunque National Forest:

1. The public participation process should have started earlier, so that the public and the agencies could have the opportunity to comment before choosing any alternative.
2. The rivers with the highest flows (Mameyes and Fajardo) are being considered as wild and scenic rivers, this designation might be in conflict with the utilization of these rivers for production of potable water and/or the location of intakes. We do not agree on anything that limits these waterbodies as sources for potable water. It is one of the US Forest Service main objectives that the watersheds be used for municipal water supply.
3. The document does not discuss if any analysis was carried out in order to conclude, that the Mameyes and Fajardo Rivers should be designated as wild and scenic rivers.
4. Even though we agree that a minimum flow shall be maintained, we do not agree on a limitation for maximum extraction. The population is in great need for this resource and PRASA should be allowed to extract more water during periods of higher flows. The minimum flow shall be reasonable and consider the public need for water.
5. The north-eastern area of Puerto Rico is an area of great economic and touristic potential. Therefore, it is very important that an adequate water supply be secured. To this effect the water sources within El Yunque are of extreme importance.
6. The document does not address the possible effect of military experiments that were carried out during the 60's and 70's (DERP and RCRA).
7. Among the four plans that were considered only one was developed, as stated in the Forestry Act. We wonder if this action is exempt from compliance with NEPA.

Please feel free to ask for any additional information.

Cordially yours,


Anibal Camacho, Deputy Director
for Strategic Planning and Finance

Response to Letter 29

1. No alternative was chosen at the Proposed Revised Plan/Draft EIS stage, although Alternative C was identified as "preferred".
2. There is no direct conflict between designation of a river segment as Wild or Scenic, and extraction of water from the same river downstream of the designated segment. It is true that providing water for municipal uses is a Forest objective, but not to the exclusion of other uses and values of the Forest's rivers.
3. The process of determining rivers' eligibility and suitability for Wild and Scenic River designation is discussed in Appendix D of the EIS.
4. We are very pleased to see that PRASA agrees on the concept of protection of minimum instream flows. We also agree that extraction of water for consumptive use is a legitimate use of Forest resources and consider ourselves PRASA's partner in making this resource available to the public. We do need to continue to cooperate to determine the appropriate balance between protection of aquatic habitat values, instream flows and consumptive use.
5. A major reason for the tourist potential you describe is the high environmental quality of the northeastern part of the island. Sacrificing environmental quality for short-term economic growth would jeopardize the basis for the area's attractiveness to tourists—in effect killing the goose that lays the golden eggs. We must work together to find the appropriate balance between environmental protection and economic growth, not choose one over the other.

6. We know of no credible scientific evidence that indicates that significant effects persist today from those experiments.
7. We have consulted with our Regional Office throughout the revision process to ensure that the letter and intent of NEPA and NFMA have been followed.



SOCIEDAD HERPETOLOGICA DE PUERTO RICO INC. 

7 de julio de 1995

30

Sr. Pablo Cruz
Supervisor del Bosque
Equipo de Revisión del Plan Forestal.
Call Box 25000, Río Piedras, P.R. 00928-2500

Estimado Sr. Cruz:

La Sociedad Herpetológica de Puerto Rico, agradece la gentileza que tuvieron en la comunicación telefónica y por invitarnos a colaborar como voluntarios en los proyectos de propagación de orquídeas y censo de coquíes. Reconocemos que por medio de estas actividades motivamos y concientizamos a nuestros miembros de la importancia de la conservación de la biodiversidad. Tenemos varias personas interesadas en colaborar con los proyectos. Deseamos conocer algunos detalles de horario y días en que se corren los trabajos.

Incluimos además las recomendaciones al Plan Forestal del Bosque Nacional del Caribe que nuestra organización plantea. Agradecemos el aplazamiento del período de comentarios.

Cordialmente,

Albert Rivera Irizarry
Presidente Sociedad Chelonia

Universidad Metropolitana, Apartado 21150 (#22), Río Piedras, Puerto Rico 00928

Response to Letter 30

1. In response to comments on the Proposed Revised Plan, the approved Revised Plan incorporates a separate management area where all timber demonstration would occur, rather than including timber demonstration in the Integrated Management Area. This management area is not located near Mt. Britton or the rivers you mention.
2. The approved Revised Plan allocates the area east of the Icacos River to a Scenic River Corridor Management Area, basically as you suggest.
3. In the approved Revised Plan most of the areas you mention are allocated to the Developed Recreation Management Area, as you have recommended.
4. We are working with the Puerto Rico Department's of Natural and Environmental Resources, and Agriculture, and non-profit community development organizations to develop a timber demonstration program that would help stimulate economic opportunities in rural Puerto Rico. However, we agree that local economic development is not the primary (nor sufficient) reason for the timber demonstration program. Demonstrating that valuable wood products can be sustainably produced from secondary forests is the primary justification for this program.
5. Transferring the Forest to the jurisdiction of the National Park Service is a legislative rather than a forest planning issue.

RECOMENDACIONES

1 Dentro de las alternativas planteadas, la opción C y D representan las de menor impacto sin limitar el uso y disfrute del bosque por parte de los puertorriqueños. Sin embargo, ambas poseen zonas 4 aledañas al Río Mameyes, Río La Mina, Río Icacos y el Monte Britton. Consideramos que las actividades de demostración maderera de alguna manera afectarían estas zonas.

2 * Recomendamos que el área que circunda el Río Icacos sea designada como zona de amortiguamiento entre el Bosque Primario y el Área Silvestre. El área integrada podría justificar la reapertura de la carretera 191 para el transporte de la madera, proyecto al que nos hemos opuesto en repetidas ocasiones.

3 * El área que circunda el Monte Britton, Bosque Tabonuco y el "Big Tree Trail" deben permanecer como área recreativa y no cambiarlas a zona 4.

4 Deseamos que se limiten las zonas 4 por entender que el estímulo al desarrollo de negocios locales de artesanía y ebanistería no justifica la "demostración maderera". Más aún cuando conocemos que el Departamento de Recursos Naturales y Ambientales produce mayor cantidad de madera que la que consumen los puertorriqueños. Esto ocurre porque el precio de venta es más alto que el de la madera importada.

5 Se planteó además que el Bosque debería ser transferido al Servicio de Parques Nacionales (NPS). Esto garantizaría la conservación del bosque en su estado actual sin las presiones de producción maderera.

UNIVERSIDAD DE PUERTO RICO
RECINTO DE RIO PIEDRAS
FACULTAD DE CIENCIAS SOCIALES
DEPARTAMENTO DE GEOGRAFIA

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764-0000 x-2479

31

13 de julio de 1995

Forest Supervisor
Caribbean National Forest
Luquillo Experimental Forest
P.O. Box 2500
Rio Piedras PR 00928

Dear Sir:

I wish to contribute my opinion as a longtime friend of the Luquillo Forest (LF) concerning the "Proposed Revised Land and Resource Management Plan" of October 1994, which has been made available for public comment.

In general, it appears that the United States Forest Service (USFS) "Revised Plan" has seriously attended the need to harmonize the growing public demand for non-extractive personal enjoyment of the forest with the scientific stewardship of its critical ecological functions. The ongoing transition from the USFS traditional emphasis on timber production to research and education on tropical forest restoration and management also appears to be reasonably articulated in the plan.

What is lacking is an overall sense of purpose to integrate the piecemeal ("site-specific") objectives of the plan and give it direction. I do not find any statement of policy regarding expansion of the forest, consolidation of its critical montane and piedmont periphery and protection of its perimeter. If peripheral areas are going to bear the brunt of intensification in recreation, timber harvesting demonstration and treatment research, then an aggressive land acquisition program is essential, granted that political and funding obstacles must be addressed.

On another level, the wildlife management objectives seem to offer little beyond continued penance for the USFS's dismal longterm management record with the extirpated White-necked Crow and virtually extinct Puerto Rican Parrot. Unfortunately, the persistence in Puerto Rico of an ecological paradigm, elsewhere discredited, that eschews naturalized exotic plants and animals in

Response to Letter 31

1. Comment noted.
2. The USDA Forest Service has legal authority to purchase privately owned land within the Forest proclamation boundary, to the extent funds for such acquisition are authorized by Congress. It is unlikely that sufficient funding will be made available for a substantial expansion of National Forest ownership. (Appendix C in the Forest Plan displays priorities for land acquisition.) We will continue seek improved cooperation with the Puerto Rico Planning Board and municipal governments to implement the Special Zoning Rule for Non-Urban Areas in Municipalities Surrounding the Caribbean National Forest.
3. The proposal to introduce exotic species is counter to the current management philosophies of the Forest Service, U.S. Fish and Wildlife Service and Puerto Rico Department of Natural and Environmental Resources. The results of such introductions are virtually impossible to predict, but there are many examples of negative effects resulting from deliberate and accidental introductions of exotic species.

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Francisco Watlington, Ph.D.
13 de julio de 1995
Página 2

favor of "unique" endemics has stifled the foresight that would enable the LF to evolve into a world-class translocation refuge for endangered Neotropical higher vertebrates such as the Golden Lion Tamarin (*Leontopithecus rosalia*).

This beautiful tiny primate is native to an undisturbed forest habitat similar in geographic and ecologic parameters to the primary forest area of the LF. The Brazilian Atlantic Forest has all but disappeared, and in situ preservation of the tamarin is a lost cause. Ex situ maintenance of captive populations at the Smithsonian and other zoos is an emergency expedient at best. Cultural (i.e. behavioral) deterioration and non-adaptive reproduction seem inevitable in the artificial environment of urban zoos.

3

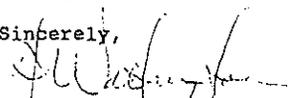
Why not "adopt" the Golden Lion Tamarin? Indeed, might not the LF provide an excellent foster home for other endangered endemic mammals and birds of the Atlantic Forest--representing life forms historically absent from Puerto Rico only because their kind lack the capability for crossing water barriers. It goes without saying that the introduction of a new faunal species should be contingent on a thorough assessment of its probable environmental impact. On the other hand, habitat niches are available in the LF that are open invitations for unplanned invasions by destructive aliens.

The LF core, five to six thousand hectares of primary forest, is at least as large as the remaining Brazilian refuge of *L. rosalia*, the nominally five thousand hectares Poço das Antas Biological Reserve in the densely urbanized state of Rio de Janeiro. However, the Brazilian reserve has been progressively degraded by road building, reservoir construction and poaching.

I propose that the USFS consider the feasibility of providing an alternative homeland for the Golden Lion Tamarin to enrich the biodiversity of the LF while contributing to preserve the wildlife heritage of the Neotropics.

The proposal will be included in a paper I am preparing on "the ecological geography of biodiversity". Enclosed as appendices of this letter are drafts of the preliminary abstract and first part of the article.

Sincerely,


Francisco Watlington, Ph.D.
Auxiliary Professor of Geography

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Puerto Rican Parrot Field Office
P.O. Box 1000
Luquillo, Puerto Rico 00773

July 13, 1995

Mr. Pablo Cruz
Forest Supervisor
Caribbean National Forest
P.O. Box 25000
Rio Piedras, Puerto Rico 00928-5000

Dear Mr. Cruz:

This letter responds to your request for comments on the proposed timber management plan near the [redacted] area. The proposed management site is contiguous to active parrot nesting areas. The [redacted] area has become an important core of parrot activity. We have observed increasing use of the area by foraging parrots during population counts. Furthermore, the pair nesting in [redacted], is one of the most recent additions to the breeding population and one of the most successful pairs. The increased use by foraging parrots and good success by the breeding pair suggests good habitat quality, or a least preference by the birds. We are expecting more use of the area by breeding parrots in the future.

The area is dominated by secondary growth forest with various plantation species interspersed. Maria (*Callophillum calaba*) and Roble (*Tabebuia heterophilla*) are the most common plantation species found in the area. Species composition may be deceiving as a factor for selecting management sites. Tree species found in parrots nesting sites include large Robles. Presence, or lack of plantation species in an area may be a poor indicator of habitat quality for Puerto Rican parrots. Therefore, parrot activity rather than vegetation composition should be a consideration when selecting sites for timber management.

The proposed management area is known to be used by foraging parrots. Impact of proposed management to foraging parrots is unknown. Nevertheless, exposure to human activities may cause disturbance to birds using the area. Human induced disturbance should be reduced since an important nesting area is found just south of the proposed management site.

Aside from Puerto Rican parrots, there are at least two species of raptors the Broad-winged Hawk (*Buteo platypterus*) and the Sharp-shinned Hawk (*Accipiter striatus*) inhabiting the proposed management area, recently included on the Endangered Species list. These species use plantations, second growth and primary forest. In addition, endangered plants may be present in the area.

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Response to Letter 32

1. The Revised Plan is not a "timber management plan", but rather a plan that encompasses all aspects of forest management.
2. The approved Revised Plan (Alternative C-mod) incorporates the suggestion to modify the Proposed Revised Plan by dropping areas in the northwest part of the Forest from the timber demonstration program, to minimize potential impacts on the Puerto Rican Parrot.
3. The approved Revised Plan (Alternative C-mod) eliminates the proposals to construct the Rio Espiritu Santo Loop Trail, to minimize potential impacts on the Puerto Rican Parrot.
4. The approved Revised Plan adopts this suggestion: the areas you mention in the northeast part of the Forest are not allocated to timber demonstration, and have been partially replaced with La Condesa Tract in the southwest corner of the Forest.

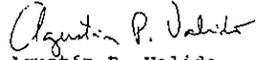
3

The construction of a new trail (14) in Alternative C of the management plan is unacceptable. The southern part of the loop will be too close to a parrot nesting site. You should consider constructing the trail to the north-west of Commonwealth road 186 to reduce disturbance to foraging and nesting parrots. We also recommend that you eliminate from your timber management plan, the forest used by foraging and nesting parrots in the area.

4

We believe there are plantations in the Caribbean National Forest which may be as good or better for such activities. Thank you for the opportunity to comment on the proposed timber management plan. If additional information is required or you have any questions regarding these recommendations, please do not hesitate to contact us.

Sincerely yours,



Agustín P. Valido
Field Supervisor



Mr. Cruz
U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL WEATHER SERVICE

#4000 Carretera 190
Carolina, Puerto Rico 00979

July 12, 1995

33

Caribbean National Forest
Call Box 25000
Rio Piedras, Puerto Rico 00928

Dear Mr. Cruz:

After reviewing the Proposed Revised Land and Resources Management Plan for the Caribbean National Forest/Luquillo Experimental Forest, we do not have comments on it.

We appreciate your interest in allowing us to make comments on this important plan.

Thank you.

Cordially yours,

Israel Matos
Area Manager, Meteorologist In Charge

Response to Letter 33

1. Comment noted.

I-91

16 de julio de 1995

Sr. Pablo Cruz
Supervisor Forestal
Servicio Forestal Federal
Bosque Nacional del Caribe
P.O. Box 25000
Rio Piedras, Puerto Rico 00928-5000

34

Estimado señor Cruz:

1 Me place informarle que recomiendo la Opción D según ésta ha sido expuesta en el "Borrador del Proyecto de Declaración de Impacto Ambiental para la Revisión del Plan de Manejo de los Terrenos y Recursos". Como dasónomo le tengo estima a El Yunque.

2 El enfoque internacional como bosque de demostración para países en desarrollo que se desea impartir al Bosque Nacional del Caribe (BNC), requiere para ser realista que el BNC este sujeto a condiciones y presiones sociales de uso similares y/o análogas a las que podrían experimentarse en los países que el BNC serviría de modelo, y ver como la sociedad lidia con estos asuntos. A continuación presento mis razones para ésta:
1)- La Opción D ofrece el segundo mayor acreaje dedicado a áreas silvestres y Ríos Silvestres/Panorámicos.

3 2) Un 100% del bosque primario estaría bajo diferentes zonas de manejo, incluyendo Zona Natural de Investigación y Zona Selvática de las cuales se obtendría data científica que sería transferible para establecer procedimientos de manejo forestal y de vida silvestre. Se reduce en un 100% respecto a la opción C el millaje de veredas bajo construcción en bosque primario, lo cual podría ser ventajoso para el ambiente natural del BNC.

4 3) La recreación en la Opción D es de menor acreaje respecto a la Opción C favorecida, pero no es sustancialmente menor, y si comparable en cantidad. Sin embargo, es mejor observar la recreación en terminos de calidad de la experiencia recreativa a ofrecerse y no unicamente en cantidad.

5 4) La vida silvestre sería modificada en igual intensidad que la Opción C favorecida, aunque un 2% mayor del área del BNC caería dentro de medio kilómetro de una carretera lo cual podría no ser adversamente impactante en comparación con otras opciones.

6 5) La Opción D ofrece menor entrega de sedimentos (tons/año) derivados de las actividades de manejo respecto a la Opción C. En estos tiempos en que se desea minimizar la sedimentación de los cuerpos de agua y reducir la erosión que degrada los recursos silvestres acuáticos, es necesario considerar este factor con alta prioridad.

7 6) La Opción D ofrece mayor acreaje dedicados a la investigación en áreas naturales y de bosque primario. Esto es en reconocimiento del rol que el BNC desea ejercer para mejorar el entendimiento y conocimiento de la biología tropical y su administración.

Gracias por cuidar nuestro "El Yunque".

Cordialmente,
Esteban Varas

Response to Letter 34

1. Comment noted.
2. Comment noted.
3. The Revised Forest Plan proposes no new trail construction in primary forest. Re-construction of the Rio Sabana/Rio Blanco Trail, approximately 2.5 miles long, is proposed; this trail does traverse primary forest.
4. We concur that the quality of recreation experiences available on the Forest is as important, or more so, than the quantity. Application of the Recreation Opportunity Spectrum concept help us address this concern.
5. Alternative C-mod, the selected alternative, is expected to have somewhat less potential for disturbance of sensitive wildlife than Alternative C. Areas of timber demonstration, and trail and recreation site construction, that were of concern to the U.S. Fish and Wildlife Service, have been dropped in C-mod.
6. Alternative C-mod is estimated to produce a similar amount of sediment as Alternative D would have.
7. Alternative C-mod recommends designation of a total of 6,372 acres (23% of the Forest) as Research Natural Area.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

35

JUL 17 1995

Pablo Cruz
Forest Supervisor
Caribbean National Forest
Call Box 25000
Rio Piedras, Puerto Rico 00928

Class: EC-2

Dear Mr. Cruz:

The Environmental Protection Agency (EPA) has reviewed the draft environmental impact statement (EIS) on the proposed revised Land and Resource Management Plan for the Caribbean National Forest (CNF), Puerto Rico. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act (NEPA).

The previous plan, which was approved by the Forest Service (FS) in 1986, was appealed by several environmental groups; the FS issued two additional documents to address the appeals. However, in 1991, the FS decided to revise the forest plan rather than amend it, and has issued this draft EIS for review. The document evaluates four alternative management plans for the CNF: continuing the current management plan (no action); emphasizing the wilderness designation, and increasing recreation opportunities; emphasizing protection of primary forests, while providing for a mix of other uses including timber demonstration and recreation (the preferred alternative); and emphasizing forest protection and research, while providing for modest levels of other uses, including timber demonstration and recreation. The draft EIS further states that all future implementation projects will tier off the Revised Plan and final EIS. Based on our review of the draft EIS, we offer the following comments.

As you know, in the past, EPA objected to the reconstruction of PR-191 through the CNF because of its adverse impacts to habitat and wildlife, and erosion and water quality problems. Accordingly, we are pleased that the revised forest management plan does not include the reopening of PR-191. Nevertheless, we understand that the Federal Highway Administration (FHWA) may prepare an EIS on the reconstruction of this road. Considering that the right-of-way for PR-191 abuts the area that the preferred alternative proposes for designation as a wilderness area, and is immediately adjacent to the segment of Rio Icacos that has been designated for listing as a scenic river, reconstruction of this road would appear to conflict with the

Response to Letter 35

1. Comment noted.
2. The Revised Plan does not propose re-opening PR 191, nor does it expressly prohibit such a proposal in the future. The Plan does recognize a need to more fully address the Forest's transportation needs. The proposed designation of the Icacos River as a Scenic River, and the proposal to build a hiking and/or bicycle trail across the landslide on PR 191 are not consistent with re-opening the road to motor vehicles. Therefore, an amendment or revision of the Forest Plan would be necessary before the road could be re-opened.
3. It is not anticipated that any projects proposed in the Revised Plan would impact wetlands. However, project level analysis will provide another opportunity to address this issue on a site specific basis.
4. The approved Revised Plan (Alternative C-mod) drops the designation of the Forest as a municipal supply watershed that was included in the Proposed Revised Plan. While there is no way to ensure that there will be adequate water to meet all demands, the Revised Plan does establish the principle of maintaining instream flows to protect aquatic habitat first, and providing for consumptive uses after instream flow needs have been met. Instream flows are not established quantitatively by the Revised Plan.
5. Figure 5-1 in the Revised Plan indicates that the Plan would be amended if monitoring indicated standards and guidelines were not effective in accomplishing Plan desired future conditions, goals and objectives.
6. Comment noted.
7. We believe the Final EIS is responsive to these concerns.

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future CNF management plan. With this in mind, we strongly recommend that the FS coordinate closely with the PHWA prior to the issuance of the final EIS to decide the future fate of PR-191. More importantly, if the reconstruction of PR-191 is to proceed, its impact on the CNF management plan must be fully assessed in the final EIS.

3 The preferred alternative includes construction of new roads and small recreational facilities, and logging in the vicinity of waters of the United States as defined by the Clean Water Act (CWA). Accordingly, the final EIS should acknowledge that these activities could require permits under Section 404 of the CWA. Moreover, environmental documentation for future site-specific projects must include analyses to identify and delineate all wetlands and other aquatic sites that would potentially be impacted, using the Army Corps of Engineers (ACE) 1987 Wetlands Delineation Manual; the FS's jurisdictional determinations should be verified by the ACE. In addition, the future projects would also have to document efforts to mitigate wetlands impacts. Keep in mind that EPA guidance calls for compensatory mitigation, providing at least a 1:1 value replacement for all unavoidable wetlands losses.

4 The preferred alternative recommends that the CNF be designated as a municipal water supply watershed. (In fact, the draft EIS notes that 12 impoundments within the CNF already provide municipal water to approximately 250,000 people.) While we conceptually agree with this designation, the draft EIS does not fully discuss whether such a designation would conflict with other uses proposed in the management plan (e.g., ecosystem maintenance, research, and recreation). Accordingly, the final EIS should quantify the water available, to ensure that there is an adequate supply for all the proposed uses of the CNF.

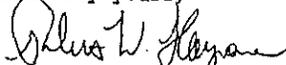
5 In our previous comments, we recommended that the FS develop procedures to measure and monitor biological diversity, including a contingency plan to address any adverse impacts due to plan implementation. Monitoring and evaluation of the desired future of the forest is incorporated into the Land and Resource Management Plan; however, contingency measures to address undesirable results are not discussed. The final EIS should include a contingency plan.

6 In our comments on previous EIS documents, we expressed concerns about soil stability and erosion, and the resultant impacts to surface water quality. The preferred alternative involves significantly less road construction and reduced timber harvest activities. Furthermore, soil erosion and sedimentation plans are included in the standards and guidelines in the forest plan. As a result, the anticipated sediment load to surface waters has been reduced from 640 tons per year to 124 tons. The draft EIS indicates that the amount of sediment will have minimal impacts on the water quality. These commitments address EPA's concern regarding the erosion and sediment impacts.

7 Based on our review, and in accordance with EPA policy, we have rated the draft EIS EC-2, indicating we have environmental concerns (EC) about the potential impacts associated with the reconstruction of PR-191; and the project's potential impacts on wetlands, water quantity, and biological diversity. Accordingly, we request that additional information (2) be provided in the final EIS to address these issues.

Thank you for the opportunity to comment. If you have any questions, please contact Ms. Evelyn Tapani-Rosenthal of my staff at (212) 637-3497.

Sincerely yours,



Robert W. Hargrove, Chief
Environmental Impacts Branch

cc: FHWA

To: Ricardo Garcia
From: Michael Keller
Date: July 14, 1995
Subject: Forest Plan

36

1
I wish to present one objection to the alternative B of the forest plan as indicated in the EIS document and accompanying maps. This option ignores the "experimental" aspect of the Caribbean National Forest/Luquillo Experimental Forest. This option would make "Wilderness" nearly the dominant land use on the entire forest. Only tiny fraction of the forest area would be available for manipulative research. The wilderness designation would make it nearly impossible to expand this experimental area in the future. It would lock out much scientific research (possibly including existing research) that requires permanent marks and/or equipment and/or experimental modification from those areas of the forest. Experiments, modification of the selected portions of the ecosystem, are critical to the scientific process. With wilderness designation over much of the forest area, the experimental approach will be nearly precluded. Shall we change the name to the "Luquillo Observational Forest?"

2
Since the 1960's Luquillo Experimental Forest has been one of the premier study locations for Ecosystem Ecology -- not only in the tropics but worldwide. Ecosystem ecology attempts to explain the function of the forest through creation of models of the forest function. Ecosystem ecology integrates the components of the forest system and provides the scientific basis for ecosystem management. This famous work has been done primarily in the El Verde area and also in the Bisley watersheds. Much of this work has depended on experimental manipulations. These El Verde and Bisley areas are primarily Tabonuco forest underlain by volcanoclastic bedrock. In the future we may be able to gain much insight by comparative manipulative studies in other forest types (Colorado, Sierra Palm) and particularly on the other major bedrock type, the quart diorite. (The upper Rio Icacos on this bedrock type is a permitted site for research by the US Geological Survey and the University of New Hampshire that could be wiped out for research purposes by Wilderness designation in Option B.) Option B of the EIS, thoroughly

Response to Letter 36

1. Alternative B is not the selected alternative.
2. Treatment vs. control research may be conducted in Management Areas 3,4,6,8 and 9 totaling 9,793 acres or about 35% of the Forest. Most of this area is tabonuco forest type and on the periphery of the Forest, which reflects the priority given to protecting primary forest. However, all major forest and soil types are represented, particularly with the inclusion of the Icacos Valley as an area where this type of research could be conducted.

eliminates the possibility of experimental studies on the Quartz Diorite bedrock.

2

Luquillo Experimental Forest has a proud research history. A deeper understanding of ecosystem ecology has been gained from this site than from any other forest site in the tropics. The limited research areas we now use are heavily saturated with experimental and observational work. Scientists already have to negotiate to fit into the limited confines of the Bisley and El Verde areas. If Wilderness designation on the scale of Option B is accepted, the future of *experimental* research in the Luquillo Experimental Option will be nearly wiped out by the stroke of a pen.

GOBIERNO DE PUERTO RICO
COMPañIA DE FOMENTO INDUSTRIAL DE PUERTO RICO

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San Juan, Puerto Rico 00918

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37

14 de junio de 1995

Sr. Pablo Cruz
P.O. Box 25000
Rio Piedras, P.R. 00928-5000

Estimado señor Cruz:

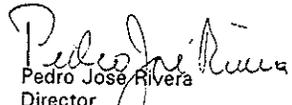
DIA
PLAN DE MANEJO PARA BOSQUE NACIONAL DEL CARIBE
BOSQUE EXPERIMENTAL DE LUQUILLO
EL YUNQUE

Hemos revisado la Declaración de Impacto Ambiental (DIA) para el proyecto de referencia.

No tenemos objeción al Plan de Manejo del Bosque, según propuesto en el documento sometido.

Agradecemos la oportunidad brindada para participar en la evaluación de este proyecto.

Cordialmente,


Pedro José Rivera
Director
Oficina de Asuntos Ambientales

Apartado Postal 362350, San Juan, Puerto Rico 00936-2350

Response to Letter 37

1. Comment noted.

86-H

38

17 de julio de 1995

Sr. Pablo Cruz
Supervisor del Bosque
Equipo de Revisión del Plan Forestal
P. O. Box 25000
Río Piedras, P. R. 00928-2500

Estimado Sr. Cruz:

Deseo expresar mis comentarios sobre la Revisión Propuesta del Plan de Manejo para el Bosque Nacional del Caribe / Bosque Experimental de Luquillo (EL Yunque). Antes de expresar mis comentarios les quiero dar las gracias por darme la oportunidad y disculparme por la tardanza de hacerle llegar los comentarios, el cual fueron ajenos a mi voluntad.

Los comentarios sobre el plan de manejo del bosque son:

1 - la propuesta para la producción de la madera está muy buena. La proyección del manejo de la producción de la madera en los bosque secundarios se debe considerar que sea beneficioso tanto para el ambiente ecológico como social. Es importante que llevarse a cabo la producción de la madera haya una área que puedan el público apreciar de cómo se lleva a cabo el manejo de la producción de la madera, como manera de educarlo y crearle conciencia sobre el mismo.

2 - la propuesta para las áreas recreativas está bien presentada. Hay que observar que las mejoras que se hagan no ocasionen daños al ambiente y que sean áreas lejanas a las áreas silvestres y áreas controladas. En otras palabras que sean áreas recreativas que no tengamos que lamentar luego. Se debe considerar áreas de acampar tanto con facilidades y áreas sin facilidades dentro la propuesta de las áreas recreativas.

3 - asunto de los accesos de las carreteras, siento la preocupación de la reapertura de la carretera PR191. No estoy a favor a que se abra la carretera y me opongo. La reapertura de carretera PR191 puede ocasionar muchos dilemas, daños al bosque, inseguridad para el público que este disfrutando, del bosque y mucho otras cosas que luego se pueden lamentar.

Response to Letter 38

1. Comment noted.
2. Some changes in developed recreation site and trail proposals were incorporated into the approved Revised Plan (Alternative C-mod) to reduce the potential for disturbance of threatened and endangered species.
3. Comment noted.
4. The Revised Forest Plan does not propose the construction of any additional dams or water diversions on the Forest. Such proposal generally come from the Puerto Rico Aqueducts and Sewer Authority (PRASA). The Forest will evaluate PRASA's proposals following the direction in the Revised Plan.

4

- asunto de proteger y proporcionar el agua del bosque, considero que se puede manejar la distribución de la misma creando una represa, el cual los ríos depositen el agua en la represa y se distribuya el agua a las áreas del bosque y áreas adyacente a éste. ,

Hasta aquí son mis comentarios, espero que sean considerados. Le quiero reconocer el buen trabajo que se está desarrollando para el proyecto del plan de manejo del bosque del Yunque, el cual está bien presentado. Espero observar, apreciar y disfrutar en algún momento el desarrollo del proyecto.

Quedo con usted,

Sheila Galíndez
Sheila Galíndez Betancourt
Frailes Garderns Apts B-101
Guaynabo, P. R. 00969
Teléfono: 781-7899

H-100

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6 de julio de 1995

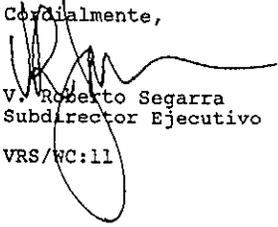
Sr. Pablo Cruz
Supervisor Forestal
Bosque Nacional del Caribe
P.O. Box 25000
Río Piedras, P. R. 00928-5000

**REVISION PROPUESTA DEL PLAN DE MANEJO
PARA EL BOSQUE NACIONAL DEL CARIBE**

Estimado señor Cruz:

Luego de haber evaluado los documentos sometidos, la Compañía de Turismo apoya el que se implemente la Opción C para la Administración del Bosque. Dicha opción daría un mayor énfasis a la protección de bosques primarios proporcionando un conjunto de otros usos, incluyendo la recreación. Es necesario el que se tome en consideración que el desarrollo recreativo no altere los valores ecológicos del Bosque y de gran atractivo turístico.

Cordialmente,


V. Roberto Segarra
Subdirector Ejecutivo

VRS/WC:11

Response to Letter 39

1. Comment noted.

H-101

SIERRA
CLUB



408 C Street, N.E. Washington, D.C. 20002 202-547-1141

Please respond to:

William E. Mankin
Sierra Club Lands Management Committee
c/o 2825 28th Street, NW, #2
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TEL: (h) 202-483-5544 (o) 202-797-6560 FAX: 202-797-6562

July 18, 1995

Mr. Pablo Cruz
Forest Supervisor
USDA Forest Service
Caribbean National Forest
Call Box 25000
Rio Piedras, PR 00928
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COMMENTS ON DRAFT EIS AND REVISED LRMP FOR THE CARIBBEAN NATIONAL FOREST

We would like to acknowledge the efforts of the Forest Service to respond to concerns raised in our appeal and throughout the planning process over the last ten years. Modifications to incorporate several of our concerns have been made, and the overall direction of the Plan has improved. We also appreciate the opportunity to present comments on the new draft Plan, and we thank the Forest Service for extending the comment period. Nonetheless, we are troubled by numerous instances where important issues we have consistently and repeatedly raised in our comments over the last eight or nine years have been completely ignored in the new draft documents. We entreat the Forest Service to address these issues clearly and directly before publishing the Final Plan.

Our comments on the draft follow, as well as our recommendation for a new alternative combining elements of B and C.

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." *John Muir*
National Headquarters: 730 Polk Street, San Francisco, California 94109 (415) 776-2211

PRINTED ON RECYCLED PAPER

Response to Letter 40

1. Comment noted.
2. The Record of Decision explains the rationale for selecting Alternative C-mod. All alternatives considered in detail responded to the need for change, so the alternatives did cover a relatively limited range. For instance, no alternative was considered that would have increased the timber sale program proposed in the 1986 Plan.
3. Management area boundaries were located in Alternatives B, C, C-mod and D so as to allocate primary forest to proposed wilderness or Research Natural Area. The approved Revised Plan (Alternative C-mod) adopts the suggestion to create a separate management area for timber demonstration.
4. The 1986 Forest Plan was approved and has been implemented, even though it was appealed, with the exception of the timber sale program and road construction.
5. A new alternative, C-mod, has been identified and selected as the Revised Plan. It incorporates several of your suggestions for modifications to the Proposed Revised Plan.

H-102

ALTERNATIVES AND JUSTIFICATIONS

2 The current draft Plan does not present and evaluate a reasonable array of alternatives, or adequately justify why it has selected the Preferred Alternative. Indeed, the alternatives presented in the draft Plan do not seem to have been drawn according to any clearly discernable rationale. Furthermore, the USFS has failed to provide any justification for why it makes most of its recommendations, and why it is proposing Alternative C as the Preferred Alternative. Our understanding of the NFMA is that it requires a clear rationale for selection of a preferred alternative.

3 For example, the Plan does not justify why it has drawn management area designations as they are on the maps; why a larger wilderness area designation would be incompatible with a very limited timber demonstration program since all the proposed demonstration areas are on the periphery of the forest outside the forest's roadless areas; why there is need for so much land in Management Area 4 (30% of the forest) when only 1,500-1,600 acres (5% of the forest) are needed for timber demonstration; why the area southwest of El Negro Peak is proposed for Management Area 4 in Alternative C, and for Management Area 2 in Alternative B; why, in Alternative B, the developed recreation area (Mgmt. Area 2) extends south along Hwy. 191 from the intersection of Hwy. 191 and Forest Route 10, but not in Alternative C:

4 We note in the paragraphs below many more such failures of justification. Without clear justification for the choices the USFS is proposing to make, we cannot support many of those choices. More importantly, we note that we made many of these identical criticisms in our comments on earlier drafts, e.g., in Sierra Club's 8 June 1990 comments to Forest Supervisor José Salinas. We fail to understand why the Forest Service has been unable, in the intervening five years, to answer our requests for more information on numerous issues we feel are essential not only to preparation of an acceptable forest plan but to sustainable forest management on the Caribbean National Forest (CNF). To ensure that our earlier comments and questions are addressed, we ask that the Forest Service consider our 8 June 1990 comments to be a part of the comments we submit today. We respectfully request that the issues we raise be addressed.

Incidentally, the LRMP states (pg. 5-2) that the Revised Plan would supersede the 1986 Forest Plan, which was "approved." It should be noted that the 1986 Plan was appealed and never implemented; to say that it was approved, or that a new plan would supersede it, is misleading.

NEW ALTERNATIVE

5 We cannot support any of the alternatives proposed by the DEIS and the Proposed Revised LRMP. We firmly believe a new alternative should be developed to combine the best of Alternatives B and C, and we propose its elements below. Finally, we intend to discuss further with the forest planners the details of this new alternative.

6. The approved Revised Plan (Alternative C-mod) eliminates the Primary Forest Management Area, and allocates this area instead to Research Natural Area, as you have recommended. In the approved Revised Plan, the area east of the Icacos River has been allocated to a Scenic River Corridor Management Area, rather than to the Integrated Management Area (as it was in the Proposed Revised Plan). Your recommendation of dual Research Natural Area/wilderness management area has not been adopted because these two management areas have different management objectives.
7. In the approved Revised Plan (Alternative C-mod) the area adjacent the Mameyes River is allocated to a newly created Scenic River Corridor Management Area. Further away from the River there is still some Integrated Management Area, but timber demonstration does not occur in this Management Area in Alternative C-mod.
8. This suggestion has not been adopted. The approved Revised Plan (Alternative C-mod) recommends the same river segments for designation as did the Proposed Revised Plan.
9. A narrow strip of secondary forest (already altered) along the East Peak Road is allocated to the Communication Sites Management Area in the Revised Plan. Limited treatment vs. control research and guided recreation can occur in this area, in addition to its primary use for communication sites and their access roads.
10. These trails are not included in the selected alternative.
11. Very limited road construction is proposed to access timber demonstration areas and new recreation sites, and to indicate expanded parking areas at certain developed sites.
12. The expansion of Quebrada Grande Picnic Area is not proposed in the approved Revised Plan (Alternative C-mod). Instead a similar amount of additional picnic area capacity would be added at a new site on PR 9966 (Jiménez Road).

The new alternative would include the following designations and directions:

- A Wilderness area of approximately 8,500 acres would be recommended for designation on the east side of the forest [encompassing the entire expanded RNA of Alternative C plus three additional areas as detailed below]. An area of at least 10,363 acres on the west side of the forest would receive similar designation [contingent on a detailed explanation of all specific boundary alignments].
- 6 ■ The area proposed in Alternative C for Management Area 8 (Primary Forest) designation, as well as the area in the Rio Icacos/Rio Prieto/Quebrada Sonadora watersheds proposed for Management Area 4 (Integrated) designation would instead be designated part of the expanded RNA (Mgmt. Area 7), with a concurrent Wilderness designation for the same area. At the same time, the area south of the intersection of Hwy. 191 and Forest Route 10, proposed in Alternative B for Management Area 2 (Developed Recreation) designation, would be similarly designated. The Rio Icacos Valley is critical for PR parrot recovery [16 July 1991 letter from 13-year parrot researcher James W. Wiley to Nathaniel Lawrence of NRDC; and 17 June 1991 letter to Mr. Lawrence from former U.S. Fish and Wildlife Service head of the PR parrot program Noel Snyder].
- The area on the East side of the forest, in the Municipio de Fajardo district, proposed in Alternative C for Management Area 4, would be similarly designated as RNA/Wilderness. There is nothing in the plan to suggest why this roadless area should be open to potential timber demonstration or other manipulative research.
- 7 ■ The area of forest east of the Rio Mameyes transected by the Bisley and Carillo Trails, proposed in both Alternatives B and C for Management Area 4 (Integrated) designation, should instead be designated part of the adjacent Management Area 6 (Research). This is a sensitive area, and there is nothing in the plan to suggest why this area should be open to potential timber demonstration.
- 8 ■ All qualifying river segments would be proposed for formal Wild/Scenic/Recreational designation.
- 9 ■ The Management Area 1 corridor along East Peak Road should be of a width similar to that along Hwy. 191 South. In other words, it should be as narrow as possible and should not be open to the siting of expanded developed recreation or administrative facilities.
- 10 ■ The Rio Espiritu Santo and Icacos Valley Trails, as proposed in Alternative B, should not be constructed. The former would traverse occupied PR parrot habitat (and the plan notes potential habitat damage from construction), and the Icacos Valley is critical for parrot recovery.
- 11 ■ No new roads would be constructed.

13. The term "sustainable" is defined in the text. It is intended to incorporate all ecological elements, not just timber production. We agree that the meaning of this term is evolving as scientific knowledge is improved, but there is no way management can wait until science knows all the answers.
14. The Roadless Area Evaluations in Appendix C have been updated in the Final EIS. The Record of Decision indicates that 37% of the Forest is enough wilderness, and that the Forest's dual status as an experimental forest indicates designation of a substantial portion of the Forest as Research Natural Area (RNA) is appropriate. The east side of the Forest contains the existing Baño de Oro RNA; proposed additions are adjacent this existing RNA.
15. We agree that back-country use can be directed and controlled by providing, or not providing, trails for access. Nevertheless, increased use because of wilderness or Wild and Scenic River designation, was a concern we heard expressed.
16. Some portions of the Roadless Areas have less wilderness character than others. Those portions that are close to roads and which do not have primary forest, have generally been allocated to management areas other than wilderness or Research Natural Area.
17. The Final EIS has been corrected to indicate that this area has never been recommended by the Forest Service for wilderness designation. We recognize that the Sierra Club has recommended designation of the Mameyes Roadless Area.
18. This recommendation has been adopted.
19. Determination of how to implement wilderness objectives (e.g. wilderness rangers, signing, etc.) on a specific trail is a project level decision.

12. ■ Expansion of the existing Quebrada Grande Picnic Area would be put on hold pending an examination of the possibility of moving the site elsewhere to reduce potential impact on endangered species.

DEFINITIONS

The new draft has replaced the old draft's term "sustained yield" with a new term "sustainable timber production". However, the definition used in the new draft is NOT of *sustainable* but of *sustained yield* timber management -- two entirely different concepts. As the Forest Service is aware, a growing consensus in the scientific and forestry communities supports the idea that sustainability requires a fully integrated, ecosystem approach to resource management -- one that involves *all* components of an ecosystem. If sustainability is the goal, managing a complex ecological system by focusing only on a single species or commodity is a prescription for failure. For example, sustainable timber management cannot be achieved without simultaneously sustaining every other component of the ecosystem of which the timber is a part.

13

If we believed that the Forest Service intended to demonstrate a narrow, *sustained yield* version of timber management on the forest, we would be compelled to oppose the whole timber demonstration program. The Plan's misuse of the terminology is unacceptable. We therefore strongly urge the Forest Service to remove the term "sustainable timber production" from the entire plan and its related documents unless it can provide both a completely new definition that incorporates all the ecological elements of *sustainability* (e.g., soil, water, biodiversity, integrated ecosystem management, non-degradation, prevention of extinction, etc.), and evidence to support a contention that the Forest Service either already is practicing sustainable forest management or expects to do so within the period of the Plan.

WILDERNESS

The draft Plan does not justify why no wilderness is being proposed on the east side of the forest, or why the boundary lines for the new El Toro Wilderness were drawn as proposed. Also, none of the serious flaws contained in the Roadless Area Evaluation (RAE) of the El Toro Wilderness (which we pointed out at length in our previous written comments: 8 June 1990 Sierra Club letter to José Salinas) have been corrected in Appendix C of the DEIS. This is unacceptable given that the Wild and Scenic Rivers eligibility study in Appendix D has been updated since the last version of the draft Plan was published. Many statements in the RAE are no longer even current.

14

As we also have in the past, we reject the draft Plan's intimation that Wilderness designation "would invite increased recreation use." Such use is fully and easily within the hands of USFS managers to control; no area need be opened to recreational access unless permitted by USFS. Of greater significance, we believe, is that, "(b)ack-country use will increase in response to... the attraction of more potential users by El Portal..." (Summary, Figure 7a, pg. 23).

15

20. The recommendation to eliminate trail shelters within areas proposed for wilderness is adopted in the approved Revised Plan.
21. The approved Revised Plan (Alternative C-mod) eliminates the Primary Forest Management Area. All primary forest is allocated to management areas proposed for wilderness or RNA in the approved Plan. We have not adopted your suggestion for dual RNA/wilderness designation.
22. The Rio Icacos Valley is allocated to a Scenic River Corridor Management Area in the approved Revised Plan (Alternative C-mod).
23. We have tried to eliminate such inconsistencies Final EIS and Revised Plan.
24. Appendix D documents the Wild and Scenic River eligibility/suitability analysis.
25. We agree that providing or not providing trail access can, to a large extent, control recreation use of rivers. However, some of the flatter stretches (for example part of the Icacos) would be accessible to recreation users without trail construction.
26. The standards and guidelines in the Revised Plan are consistent with national Forest Service direction for management of Wild, Scenic and Recreation Rivers.

16 We recommend an 8,500 acre Mameyes Wilderness designation on the east side of the forest. This area fully qualifies; the CNF possesses the only available wilderness Puerto Ricans will ever have, so as much of it as possible deserves formal designation; and Wilderness designation for this area will not conflict with any other uses described in the new DEIS or Revised LRMP. We oppose allocating any currently roadless areas to management areas that would permit a range of multiple uses.

17 The DEIS incorrectly states (pg. III-59) that "(n)one of the Mameyes Roadless Area has been previously recommended for wilderness designation. In fact, the 18 September 1987 letter from appellants' co-counsel to CNF Supervisor Bernie Rios calls for a wilderness study of the east side of the forest, and the Sierra Club's 8 June 1990 comments to José Salinas included a detailed recommendation for a Mameyes Wilderness designation.

18 In the Final Revised LRMP, in the Watershed Protection Standards and Guidelines, we recommend that Management Area 5 be added to the type of area where fertilizers would be prohibited, and where the IITF would be consulted prior to any landslide stabilization. In general, landslides in wilderness should not be stabilized.

19 The Plan's Standards and Guidelines for Wilderness present group size limitation and permitting requirements. If the Rio Sabana/Rio Blanco Trail is constructed, these requirements would necessitate the placing of a full-time ranger at the trailhead/picnic area in order to control use by casual hikers. We would like to see this spelled out in the Final Plan. Also in the same guidelines there is reference to trail design, but there is no recommendation regarding trail surface compatibility with wilderness. This is a subject we have raised in earlier comments, and we would like the Final Plan to address it. Finally, again in the same guidelines under "Facilities" (pg. 4-60), there is a statement indicating that shelters would be permitted in designated Wilderness. We oppose this as incompatible with the Wilderness Act, and ask that it be removed from the Final Plan.

"PRIMARY FOREST" DESIGNATION

20 The Plan provides no justification of the need for this new type of management unit designation, or of why it should be located in the Rio Icacos Valley. This is even more confusing since its management prescriptions appear to be essentially identical to RNA designation (LRMP pp. 4-63--4-67). Therefore, we recommend replacing this designation with a concurrent RNA/Wilderness designation as described above.

RNA DESIGNATION

21 We support the proposed enlargement of the RNA and recommend a further enlargement (see above). One of the primary mandates of the Luquillo Experimental Forest is research, and RNA designation provides a strong protective environment in which such research can take place without risk of disturbance. Areas not only of primary forest (in all types and zones), but of

27. Our best estimate is that three miles of road construction will be needed to implement the direction in the Revised Plan. The approved Revised Plan (Alternative C-mod) includes a Timber Demonstration Management Area which gives a more specific idea than the Proposed Revised Plan of areas that will need road access. However, site specific project analyses will still be necessary to determine exactly where road construction is needed.
28. The East Peak Road corridor (Management Area 3 - Communication Sites) is only as wide as the strip of altered forest along this road.
29. This point has been clarified in the Final EIS.
30. This trail was located to follow an existing trail. The ID Team and Forest Management Team confirmed in the field that no new trail construction will be required, only reconstruction.
31. This trail is not included in the selected alternative.
32. The Rio Espíritu Santo Loop Trail is not included in the selected alternative (C-mod).
33. The creation of a Timber Demonstration Management Area in the approved Revised Plan (Alternative c-mod) clarifies this point.
34. The demonstration of sustainable timber production will occur within the 1,167 acres of Management Area 8. An additional 120 acres in other management areas would be allocated to demonstrate various forest ecological and management concepts.

22 robust secondary forest, as well as key PR parrot recovery habitat like the Rio Icacos Valley, should be represented in the RNA. Unlike Alternative C, our proposal would include such areas.

23 The Forest Service should eliminate inconsistencies in acreage figures for the RNA (e.g., DEIS pg. III-67 and the map for Alternative C).

WILD AND SCENIC RIVERS

24 The USFS does not justify in the draft Plan why only seven of the CNF's fifteen river segments studied for eligibility received detailed analysis, or why Alternative C proposes formal designation for only three of them. The draft Plan also does not explain why the other seven rivers on the forest with "distinctive" ratings (Table D-1, pg. D-4, DEIS) were evidently denied detailed analysis and were not proposed for formal designation. The draft Plan further fails to explain why the river segments proposed by Alternative C for formal Wild & Scenic designation are more worthy of such designation than the segments it does not so recommend, especially since all four of the un-designated segments lie within areas proposed either for Wilderness or RNA designation - strongly protective designations that are fully consistent with Wild & Scenic River designation.

There are 1,125 miles of rivers and streams on the forest. Sixty-two miles were evidently studied by the USFS and sixty of those miles were found to have one or more distinctive characteristics. Alternative C, however, proposes formal designation for less than nine miles - only .8% of the forest's stream miles (or only 1% of the perennial stream miles). At a minimum, Alternative C raises serious questions, especially in the absence of a rational explanation of why 99% of the forest's river miles are deemed unworthy of designation.

Given that the CNF's rivers will probably represent the only opportunity for formally designated protected rivers Puerto Ricans will ever have, we recommend that all river segments on the forest which possess qualifying attributes be proposed for formal Wild/Scenic/Recreational designation. We do not accept Alternative C's recommendation.

25 We reject the DEIS's contention (pp. III-62-63) that Wild & Scenic designation could adversely affect parrot and other wildlife habitat by increasing recreational usage. A decision whether or not to build trails within the river corridors is entirely within the hands of the USFS. If the USFS wishes to prevent adverse impacts from recreational users, it should simply not construct any trails within the river corridors.

26 In his 8 June 1990 letter to José Salinas on behalf of the appellants to the 1986 Forest Plan, Robert Dreher of the Sierra Club Legal Defense Fund noted that the proposed management standards for Wild & Scenic Rivers that were contained in the Plan "deviate from Forest Service administrative direction for such potential wild and scenic rivers." He then asked that the standards be revised. We note that the standards contained in the new draft (DEIS pp. D-25-29) are unchanged, and are in fact identical to those in the previous draft. We recommend that they be conformed to Forest Service administrative direction.

35. The Final EIS clarifies this point. It is true that different wildlife species are associated with various habitat types and stages of succession, contributing to biodiversity. Primary forest is a very limited habitat in Puerto Rico and the Caribbean generally, and it has habitat values that are irreplaceable, at least with our current knowledge.
36. Our information indicates that demonstration of sustainable timber production from secondary and cutover forests would be valuable because it is currently rarely practiced. At the same time the area of secondary and cutover forests in the tropics is increasing rapidly as primary forests are logged and cleared for agriculture, and previously cleared areas grow back.
37. We agree that forest management means more than timber production, and we strive to demonstrate this principle.
38. This level of detail will be addressed in site specific project analyses.
39. The approved Revised Plan (Alternative C-mod) does not include a designation of the Forest as a municipal supply watershed. It does establish the need to provide instream flows for maintenance of aquatic habitats first, and meeting consumptive demands second.
40. Growth of the reproductive segment of the Parrot population has proven to be a slow process. Although the wild flock has almost doubled since Hurricane Hugo, the number of successful breeding pairs remains between 5 and 6, as opposed to 3 to 5 before the hurricane. We believe the goal of 10 breeding pairs within 10 years is realistic, although we are hopeful our cooperative efforts with USFWS and DNER will result in more breeding pairs.

ROADS

27 The draft Plan does not justify why exactly four miles of new road are necessary, nor present any map showing where its proposed new roads would be located. In a 20 July 1987 letter to appellant co-counsel Robert Dreher, CNF Supervisor Bernie Rios promised that "(g)eneral locations and schedules [for new local roads] will be given in the amendment...", but we still cannot find this anywhere in the new draft in 1995. This omission should be rectified in the Final Plan.

28 Most importantly, the draft Plan does not explain why timber demonstration cannot be located near existing roads - numerous plantations and managed forest sites are so located. The draft Plan also does not explain why the width of the corridor along East Peak Road is much wider than that for Hwy. 191 South, and why its configuration is different between Alternatives B and C. These inconsistencies should be corrected in the Final Plan.

29 Regarding Highway 191, we find the draft Plan's contention that "(s)mall businesses along the highway in the Naguabo area have reported decreased sales because of the cessation of through traffic" (DEIS pg. I-9), to be incredible. The road has been blocked by landslide for *twenty-five years*; by now, businesses would long since have adapted to the change.

TRAILS

30 The draft Plan does not justify why the specific route of the proposed new Rio Sabana/Rio Blanco Trail has been chosen. We believe that route should be reconsidered. The trailhead will be at a new developed picnic and recreation site at the southern edge of the forest within very easy access to large numbers of casual users. It will be a very short distance from the trailhead to primary forest and wilderness. We recommend instead routing the trail westward along the southern edge of the primary forest zone for approximately one mile before then turning it northward to intersect with the El Toro/Tradewinds Trail. This would, to an extent, buffer the wilderness from the impacts of more casual hikers, who may come to the developed picnic area poorly prepared to enter a designated wilderness. Finally, we note that the draft Plan's recreation goals for trail construction (LRMP pg. 4-25) would be violated by the construction of this particular trail.

31 We believe the proposed Rio Espiritu Santo Trail (in Alternative B) should not be constructed due to its potential adverse effects on recovery of the PR parrot, as stated in the DEIS.

32 The DEIS (pg. III-36) states that, under Alternative C, "trail segments within occupied parrot habitat would be closed." Does this include the Tradewinds Trail? The Revised LRMP also states (pg. 3-15) that "(t)he Revised Plan eliminates proposed trail construction in currently [occupied] parrot habitat." Both statements are inconsistent with Alternative C's proposal to construct new trail segments within occupied parrot habitat, the Rio Espiritu Santo Loop and the Rio de la Mina Trail. The Final Plan should eliminate such statements.

41. A map of the Puerto Rican Parrot habitats (management situation concept) has been added to Appendix F in the Final EIS and Appendix A of the Revised Forest Plan. This map and the Key Habitat Maps demonstrate that virtually no recreation development and no timber demonstration would occur within occupied Parrot habitat, and only a limited amount of recreation development (primarily trail construction) would occur in potential habitat.
42. Comment noted.
43. Management priorities need to be set given budget, personnel, and technical knowledge limitations. Monitoring and inventory efforts are concentrated on known or likely locations of threatened, endangered and sensitive species, and in areas where habitats will be altered or disturbances will occur. There is no way we can know or measure everything.
44. The point of this analysis was to provide a cumulative effects perspective on how much of the entire Forest would be altered by proposed developments. It is not possible to produce a map of the habitat of every species on the Forest. Instead we have made two broad wildlife analyses: one focused on the Puerto Rican Parrot, which is critically endangered, is known to be sensitive to habitat change and to human disturbance, and for which we have substantial information; the second analysis looks at the Forest as a whole.
45. The Revised Plan does reduce effects as compared to the 1986 Plan.
46. The re-vegetation standards refer to landslides, not to management activities.
47. These figures have been revised in the Final EIS based on the most recent information available.

TIMBER DEMONSTRATION AND PLANTATIONS

33 The draft Plan's maps do not indicate where secondary forest treatments and timber demonstration would take place; maps included in the Final Plan should do so. The 1990 Draft Amended LRMP states that, by 1990, a "long range action plan that describes specific [timber management] projects to be carried out" will be developed. In our 8 June 1990 comments to that LRMP, we asked for this action plan to be described in detail in the revised LRMP. As far as we can tell, it is not mentioned anywhere in the new draft Plan.

Although throughout the draft Plan the figure of 1,500 acres is used to indicate how much of the forest would be allocated to timber demonstration under Alternative C, Table 4-3 (LRMP, pg. 4-68) shows a different total -- 1,200 acres of plantations, 300 acres of native secondary forest, and 120 acres of "roadside demonstration plots," for a total of 1,620 acres. This discrepancy, as well as the nature of the "roadside plots", needs to be explained in the Final Plan.

34 Page III-41 of the DEIS states that Alternative B would include some timber harvest: page 17 of the Summary states that Alt. B would demonstrate various timber management prescriptions on 120 acres; but elsewhere throughout the Plan it is stated unequivocally that Alternative B would not permit any timber demonstration. The following tables also present conflicting information on Alt. B's timber demonstration/maintenance: Summary, Table 2, pg. 15; DEIS Table III-3, pg. III-34; and DEIS Table II-2, pg. II-12. It seems that Alternative B would include demonstration activities on 1,000 acres of existing plantations while at the same time it proposes ample Wilderness designations on both sides of the forest. This fully supports our contention that a new alternative can be designed to accommodate multiple uses on the forest without compromising either Wilderness or very limited timber demonstration activities.

35 We reject the suggestion in the DEIS that native secondary forest is of lesser value for wildlife than primary forest (pg. III-34). There is insufficient evidence in the Plan that the USFS has enough knowledge about the forest's biodiversity to support such a sweeping assertion. Furthermore, not only are the lower, peripheral areas of the forest the preferred habitat of the endangered PR boa, but they are critical to the recovery of the PR parrot (especially advanced secondary Tabonuco forest - identified for complete protection by the 1990 Draft Amended LRMP).

36 We still believe that the rationale the USFS uses to justify its timber demonstration program is very weak. The abundance of real-world timber harvesting operations and research projects associated with them that are currently underway in the tropical forests of the world would effectively relegate most CNF demonstration programs to near insignificance. Also, for many forest managers, the CNF programs might even fail the test of relevance because they would be disconnected from the most serious pressures and problems faced by most tropical forest managers -- market prices and terms of trade, poverty, shifting agriculture, wood fuel demand, etc.

48. The Revised Plan does provide direction to address the Forest's transportation needs as soon as practical. We expect a future Plan amendment or revision will incorporate new direction based on this analysis.
49. The approved Revised Plan (Alternative C-mod) does not include the proposal to expand Quebrada Grande Picnic Area.
50. The approved Revised Plan (Alternative C-mod) revises the size of the Mt. Britton Trailhead. In addition, the map for C-mod more accurately indicates that this trailhead would be located outside occupied Parrot habitat.
51. The analyses in the EIS are based on all the developments and disturbances (e.g. recreation site and trail construction, timber demonstration) that are projected to occur over 50 years.
52. Monitoring is ongoing and will continue.
53. Comment noted.
54. No alternatives were considered that would increase the areas permitted for communication sites. The alternatives do vary in terms of which management areas access roads to the communication sites are allocated to.
55. A section on Integrated Pest Management has been added in the approved Revised Plan, which indicates standards and guidelines that would be followed in the application of any herbicide. There is currently no use of herbicides on the Forest, and no use is anticipated, aside from the possible limited application is some research projects. Any such use would undergo site specific environmental analysis.
56. Comment noted.

37 Among the essential management tools the USFS should be demonstrating are improved valuation of all forest resources, biodiversity inventory and management techniques, utilization of non-wood forest products, certification assessments, monitoring, training of forest managers in sustainable multiple resource management, and public education. Unfortunately, we do not see any of these mentioned in the Plan. It would appear that the Forest Service has such a narrow, timber-harvest focus in the design of its "demonstration" program that it may not be able to demonstrate the integrated, holistic approach that is essential for sustainable forest management. That would be regrettable.

38 We would like to state here our preference for selection harvesting over even-aged management. Also, although the draft Plan presents a commitment to "(e)mphasize natural regeneration, including native species in plantations now dominated by exotic species" (LRMP pg. 4-53), nowhere in the Plan are any details of how this will be accomplished and on what schedule. We support this commitment, and we would like the Final Plan to present the details.

"MUNICIPAL WATER SUPPLY" DESIGNATION

39 The draft Plan does not clearly explain this designation and its implications, or its "conditions and limitations" (Summary, pg. 8). We would like to know what agency would make and administer the designation, and what the management implications would be for Wild/Scenic/Recreational Rivers and for Wilderness. For example, would this designation require landslides in Wilderness to be stabilized? We also would like to know whether this designation would permit "modifying intakes to avoid reducing streamflows below natural minimums" (DEIS pg. III-13); such reduction of streamflows currently occurs during periods of low water when existing water withdrawals in some streams reduce downstream flows below the ecological minimum, or even to zero flow.

PUERTO RICAN PARROT RECOVERY

40 In the Revised LRMP, page 4-71, the draft Plan presents a goal by the end of the plan period of only ten breeding pairs of parrots. The Parrot Recovery Plan recommends that there be 25 breeding pairs in captivity in the aviary, and considerably more in the wild population, with a total wild population goal of 500 birds in the Luquillo Mountains. Furthermore, ten breeding pairs is almost what currently exists in the wild population. Thus, the draft Plan's goal is far from an acceptable target. At that rate, it could take 200-300 years for the parrot to recover.

41 Although Figures II-9a and II-9b (DEIS pg. II-27) refer to parrot "potential habitat", none of the maps do so. This is important information that should be included on the maps, as it would make it clear that virtually the entire forest is essential parrot recovery habitat.

42 We support the Forest Service's commitment to work with the FAA to prevent aircraft overflights below a minimum altitude and during parrot breeding season.

BIODIVERSITY, WILDLIFE HABITAT, AND INVENTORIES

We commend the Forest Service for its strong and unequivocal commitment to maintaining the CNF's complete ensemble of biological diversity, including viable populations of all native species in existing or historic distributions (LRMP pg. 4-10).

43 However, we believe a biological inventory is essential to sustainable management of the forest. Impacts cannot be measured or monitored unless managers know what the baselines are. The LRMP states that the biological values of the CNF's primary forest "remain incompletely known" (pg. 3-5). Yet the draft Plan makes no clear commitment to conduct a thorough biological inventory of the forest. Although the DEIS states (pg. G-3) that "(a)ll species were reviewed, and (pg. G-1) that there is a goal of "rapid and consistent evaluation of biological resources throughout the planning process," these statements appear to apply only to Management Indicator Species. There is no indication anywhere that the forest's plants and animals have been or will be systematically inventoried. In his 20 July 1987 letter to appellant co-counsel Robert Dreher, CNF Forest Supervisor Bernie Rios stated, "It is true that the Forest Plan could have more specifically identified biotic inventory needs, and scheduled particular inventories. We will address this subject in the amendment, and more specific direction will be given regarding biotic inventories." Yet the new draft Plan, eight years later, does not appear to do so. The Forest Service's promise to the appellants of the 1986 Plan has not been fulfilled.

44 Regarding wildlife habitat, the draft Plan takes a peculiar approach to evaluating impacts on wildlife and habitat. The Plan seems to consider the entire forest as "habitat" without delineating or assessing the unique habitats of individual species. At the same time, the Plan provides small maps that detail occupied PR parrot habitat, but no maps indicating the habitat of any other species. This "generalities vs. single-species" imbalance should be corrected.

45 The Revised LRMP incorrectly states (pg. 3-14) that the revised plan "reduces effects on wildlife habitat," and (pg. 3-15) "reduces the amount of parrot habitat altered." To the contrary, it seems quite apparent that, because the preferred alternative would construct new trails, roads and developed recreation sites, and begin a timber demonstration program, the effects on wildlife (and parrot) habitat would surely *increase* (which is clear in LRMP Figure 3-5b and in DEIS Table II-13]. The final Plan should avoid such statements.

46 Regarding revegetation on areas disturbed by management prescriptions, we recommend a revision of the Watershed Protection Standards and Guidelines (LRMP pg. 4-5), which suggest that non-native vegetation may be used "where native species cannot be established." We recommend that where planning and environmental assessment determine that re-establishment of native vegetation is unlikely to be successful, plans for disturbance should be revised or dropped.

47 Page III-22 of the DEIS states that the Commonwealth of Puerto Rico lists 20 forest plant species as threatened or endangered, while Table III-2 (pg. III-26) puts the number at 26. These figures should be comparable.

DEVELOPED RECREATION AND TRANSPORTATION

48 If, as stated in the DEIS (pg. III-50), "(d)emand for developed recreation exceeds existing capacity by an estimated 300-400% on summer weekends," then it is unreasonable for the USFS to postpone consideration of alternative transportation systems until "the future" (same page). We recommend that the final Plan address this issue directly and in some detail, and that the "Forest Transportation Plan" (LRMP pg. 4-33) be developed as soon as possible.

49 The DEIS suggests that the existing Quebrada Grande Picnic Area has an impact on "endangered species that occur in the vicinity." Yet, Alternative C would expand that picnic area. We recommend a re-evaluation of this expansion, and an examination of the possibility of moving the site elsewhere.

50 We recommend against any expansion of Management Area 2 in the upper levels of the forest. We also have reservations about the siting of new, or the expansion of existing, developed recreation sites in the same area, due to potential impacts on the PR parrot. We oppose the creation of new parking sites in this area, specifically the one for twenty cars in occupied parrot habitat at the new trailhead near Mt. Britton [Would this trailhead be for the Tradewinds or the Mt. Britton Trail?]. We believe alternative transportation options should be explored as soon as possible to service this part of the forest. As the DEIS states in its Guidelines for Forest Activities in PR Parrot Habitats: "Projects with potential to permanently preclude area use by parrots... should be planned outside of essential habitats." (pg. F-10)

LIFE OF THE PLAN, CUMULATIVE IMPACTS AND MONITORING

51 It is our understanding that the Plan should present management direction and projections for the next 50 years rather than the "10-15 years" stated in the Plan. The draft Plan does so only intermittently and cursorily. An evaluation of the cumulative impacts of the Preferred Alternative is required by NEPA and should be included in the final Plan. Implementation of the Preferred Alternative would increase the amount of the forest within one-half kilometer of roads and other developments by 12% or 3,300 acres (DEIS Table II-2, pg. II-13), and even the current level of such development "is believed to be significant to disturbance-sensitive species such as the Puerto Rican parrot." (DEIS pg. III-35). Clearly, this and similar cumulative impacts need more thorough assessment in the Plan.

52 As a general principle, we also believe that the Forest Service should engage in no land disturbing activity in the absence of a monitoring program being in place which establishes an initial baseline and then periodically assesses impacts.

SPECIAL USES

53

We support the Forest Service's Standards and Guidelines regarding limitations on military exercises (LRMP pg. 4-23).

Although the DEIS states (pg. III-45) that El Yunque and East Peak electronic sites currently occupy 31 acres of land, and the LRMP indicates that the forest's communications sites "continue to occupy the same areas [and that] no additional sites are developed" (LRMP pg. 4-50), Table 4-1 (LRMP pg. 4-45) shows a 15% increase in acreage (from 70 to 80 acres) allocated to such uses. An explanation is required for these discrepancies and for why an area as large as 80 acres would be needed for the sites. We believe that if the sites currently occupy only 31 acres, then the official acreage devoted to Management Area 3 should be reduced to 35 acres to prevent unnecessary expansion. These sites are acknowledged to be visual eyesores, they require intrusive access for maintenance, and they may impact PR parrots.

54

USE OF HERBICIDES

55

Although in their previous comments (8 June 1990 letter from Robert Dreher to José Salinas) the appellants raised questions about herbicide use and requested more detailed information about such use, the new draft Plan is silent on this subject. We request, in the Final Plan, a response to our earlier comments.

FINAL THOUGHTS

56

The Caribbean National Forest (CNF) is a significant natural treasure both for Puerto Rico and for the whole nation. We strongly support the sustainable management of the forest to provide water and recreation opportunities for Puerto Ricans; wilderness, biodiversity and environmental education for all Americans; and sustainable forest management education and training for foresters and land managers from throughout the tropics. We stand ready to work with the Forest Service to accomplish these goals.

#

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Estado Libre Asociado de Puerto Rico
DEPARTAMENTO DE TRANSPORTACION Y OBRAS PUBLICAS
Apartado 41289, Estación Minillas, Santurce, Puerto Rico 00940-1289

Dr. Carlos I. Pasquera
Secretario

Núm.
Sírvase mencionar este número
cuando se refiera a este asunto.

41

21 de julio de 1995

Sr. Pablo Cruz
Supervisor Forestal
U.S. Forest Service
P.O. Box 25000
Rio Piedras, Puerto Rico 00928-5000

Declaración de Impacto Ambiental
Bosque Nacional del Caribe

Estimado señor Cruz:

Le incluyo nuestros comentarios sobre la Declaración de Impacto Ambiental sobre el Plan de Manejo de los Terrenos y Recursos del Bosque Nacional del Caribe.

Esperamos que los mismos reciban consideración durante la preparación de la revisión del plan de manejo del bosque y de la DIA final.

Atentamente,

Carlos I. Pasquera
Secretario

Anexo

Response to Letter 41

1. We agree.
2. Correct.
3. The Revised Plan does not propose re-opening PR 191, nor does it expressly prohibit such a proposal in the future. The Plan does recognize a need to more fully address the Forest's transportation needs. The proposed designation of the Icacos River as a Scenic River, and the proposal to build a hiking and/or bicycle trail across the landslide on PR 191 are not consistent with re-opening the road to motor vehicles. Therefore, an amendment or revision of the Forest Plan would be necessary before the road could be re-opened.
4. More important than its technical classification, is the problem that PR 191 is not well suited to the heavy use it currently receives, especially on busy weekends. This is why we believe alternatives involving mass transit systems need to be considered in addressing the Forest's transportation needs.
5. We look forward to working with PRDOT on a comprehensive study of the Forest's transportation needs and alternative solutions.
6. Reference to comments favoring re-opening have been added in the Final EIS and Revised Plan documents.
7. Whether or not PR 191 is a through route, it provides the major access for most of the Forest's estimated 750,000 visitors. The Forest is probably the second most important tourist site in Puerto Rico, after Old San Juan.

DEPARTAMENTO DE TRANSPORTACION Y OBRAS PUBLICAS

COMENTARIOS SOBRE EL BORRADOR DE LA DECLARACION DE IMPACTO AMBIENTAL DE LA PROPUESTA REVISION DEL PLAN DE MANEJO DE LOS TERRENOS Y RECURSOS DEL BOSQUE NACIONAL DEL CARIBE, PREPARADO POR EL SERVICIO FORESTAL DE LOS ESTADOS UNIDOS

1 El Bosque Nacional del Caribe (El Yunque) es una de las áreas recreativas más famosas de Puerto Rico. Las oportunidades recreativas proporcionadas en las áreas de jiras, las vistas panorámicas, las veredas, y los ríos del Bosque son recursos escasos y valiosos, del mismo modo que son las maravillas biológicas del Bosque.

El sistema de transportación del Bosque consiste de 44.8 millas de carreteras asfaltadas. La red entera es parte del sistema de carreteras del Puerto Rico, con excepción de los caminos de uso especial FR-10 y FR-27 (un total de 5.3 millas).

El Departamento de Transportación y Obras Públicas (DTOP) y la Administración Federal de Carreteras (FHWA) han propuesto proyectos para la reconstrucción y reapertura de la Carretera PR-191 y la reconstrucción de la Carretera Sonadora, PR-966, la cual sirve de enlace entre las Carreteras PR-191 y PR-186.

2 Durante los años 1970 una sección de la Carretera PR-191 fue destruída por derrumbes, del Km. 13.3 al Km.21.0, y desde entonces esa sección ha estado cerrada al público. Esta carretera atraviesa al Bosque de norte a sur. Es la ruta principal de acceso al Bosque y tiene el tráfico más pesado de todas las carreteras del sistema.

En los años 1991-92, asociaciones ambientalistas locales y del continente americano entablaron un pleito contra el proyecto de reapertura de la Carretera PR-191. La Corte del Distrito Federal de EE.UU. promulgó la orden para que la Administración Federal de Carreteras del Departamento de Transportación de EE.UU. y/o el Servicio Forestal del Departamento de Agricultura de los EE.UU., desarrolle una declaración del impacto ambiental antes de proceder con el proyecto de reapertura de la carretera, o con cualquier otra acción al respecto.

3 En ninguna de las alternativas consideradas en el borrador de la Declaración de Impacto Ambiental (BDIA) se contempla la reapertura de la Carretera PR-191. Todas las alternativas de esta BDIA analizan los efectos a base de mantener la Carretera PR-191 en su condición actual (cerrada del Km. 13.3 al Km. 21.0). Entendemos que ésta es la preferencia del Servicio Forestal aunque no lo expresa directamente el borrador del DIA. El Servicio Forestal debe expresar claramente su posición sobre la reapertura de la PR-191.

8. We agree this aspect needs to be assessed more thoroughly as part of the overall transportation analysis for the Forest. But our initial studies do indicate that through traffic would complicate operation of a mass transit system. Most similar systems do not accommodate through traffic, and require control access of private vehicles.

Actualmente la Carretera PR-191 está clasificada como una carretera secundaria ya que de acuerdo a lo contemplado originalmente cerraría un circuito entre dos carreteras primarias, PR-3 y PR-31. Si su continuidad sigue interrumpida permanentemente en el futuro, para efectos administrativos sus dos tramos restantes inconexos podrían considerarse como vías terciarias.

- 4 En cuanto a su clasificación funcional la misma está catalogada como una Colectora Principal según el último estudio que se realizara de todo el sistema vial de la Isla en 1992 y que fuera aprobado por los alcaldes y la Administración Federal de Carreteras. La misma fue clasificada de esa manera tomando en consideración que iba a ser reconstruida y abierta al tránsito dentro del período de cinco años al cual se proyecta la clasificación funcional. No siendo así, los tramos norte y sur de la PR-191 se clasificarían más apropiadamente como una Colectora Secundaria ("Minor Collector") tomando en consideración su función de acceso a un área recreativa y bajo esa categoría no podría recibir fondos federales STP como en la actualidad.

El documento da muy poca atención a la planificación, construcción, manejo y mantenimiento del sistema vial para servir las necesidades de transportación del bosque.

- 5 El Bosque tiene desarrolladas áreas recreativas muy pequeñas en comparación con la demanda. La mayoría de las áreas están concentradas en una sección pequeña del Bosque. Por consiguiente, las áreas favoritas están llenas, creando problemas de congestión del tráfico y de estacionamiento.

Recomendamos que se estudie con mayor amplitud y detalle los aspectos relacionados con la transportación vial en el Bosque, en los sistemas viales de acceso y el impacto en el sistema de la región. Dicho estudio debe abarcar la planificación a corto y largo plazo, incluyendo las medidas de manejo en caso de emergencias y otras. Dicho estudio debe contemplar diferentes alternativas sin dar preferencia a ninguna opción.

- 6 En la página 9 del resumen y la I-11 bajo el ASUNTO 7, Transporte, se indica de los comentarios opuestos a la reapertura de la PR-191 pero, no se menciona si se han recibido peticiones de que se reabra esta ruta.

- 7 De prevalecer el concepto de mantener la PR-191 cerrada, este Departamento tendrá que reevaluar si mantiene la sección de esta ruta dentro del bosque en el sistema estatal de carreteras, ya que el cierre limitaría su uso a las necesidades del Bosque.

- 8 En la presentación que nos hizo el Servicio Forestal el 15 de mayo de 1995 de este DIA se indicó que la reapertura de la PR-191 precluye la consideración de otros medios de transportación. No vemos en que se fundamenta esta conclusión.


DEPARTAMENTO DE EDUCACIÓN
SECRETARÍA AUXILIAR PROGRAMA REGULAZ

22 de junio de 1995

42

Sr. Pablo Cruz
Supervisor del Bosque
Equipo de Revisión del Plan Forestal
Call Box 25000
Río Piedras, Puerto Rico 00928-2500

Estimado señor Cruz:

En relación con el Proyecto de declaración de impacto ambiental para la revisión del plan de manejo de terrenos y recursos para el Bosque Nacional del Caribe/Bosque Experimental de Luquillo (El Yunque), el Programa de Ciencia recomienda la opción C por las siguientes razones:

- 1- El énfasis mayor es en la participación de bosques primarios.
- 2- Provee para otros usos sin alterar el énfasis primario.
- 3- Se identifican las diferentes áreas de manejo como:
 - a- sitios administrativos
 - b- recreación desarrollada
 - c- sitios de comunicación
 - d- área silvestre
 - e- área integrada (recreación diseminada, investigación y demostración sostenida de madera)
 - f- investigación
 - g- área natural de investigación.
 - h- bosque primario.

Response to Letter 42

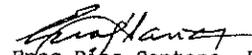
1. Comment noted.

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Estamos seguros de que la decisión final que se tome en relación con El Yunque contribuirá significativamente a la conservación, al mejoramiento y al futuro de este importante recurso natural.

Le deseamos éxito en tan importante gestión.

Cordialmente,


Eric Díaz Santana, Ed.D.
Secretario Auxiliar
Programa Regular