

OT	S	RT	DT	EA	F	RI	CE

Attributes

Response Type: 1 - Letter

Delivery Type: W - Web-based submission

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Form Letter:

Comments

I am pleased with much of the new National Forest Management planning rule proposal, but the new rule ignores scientific recommendations on wildlife diversity protection. In its present form, the draft rule promises much more than it delivers, leaving the future of wildlife on 193 million acres of land belonging to the American people mostly up to chance. It is disturbing to me that the single most important measurable regulation to protect wildlife, the Viability Standard at 219.19 in the 1982 regulations, has been completely eliminated. The Viability Standard states that "Fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area."

The 1982 Viability Standard continues, "For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area."

"In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area."

I fear that without such clear direction for protecting wildlife, the Forest Service is giving up its responsibility of maintaining our national forests as the last refuge for our country's increasingly imperiled wildlife.

I also believe that watersheds will not be effectively protected until forest roads are removed, streamside buffer zones are established (cattle grazing should be reduced or eliminated in our National Forests) and firm standards should be established for protecting waters and aquatic life. Good intentions are not enough.

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Created On	3/16/2011 2:12:00 PM