

Appendix 8

Comments Raised from Public Review of Additional Management Indicator Species Information

The following comments were made in response to additional information regarding the effects of the proposal on Management Indicator Species (MIS). The additional information (displayed in Appendix 7) was sent out to the public on June 22, 2001 for a 30-day comment period, which ended on July 24, 2001. The comment made appears in **bold type**, and our response follows in non-bold type. Also attached to this appendix is the original comment letter.

- 1.1 A comment was made that the supplementary information provided for further public comment only focuses on clarifying where management indicator species (MIS) are discussed in the environmental assessment. This, in spite of the fact the MIS was considered but dismissed in the EA. As a result, it is felt the GMNF should not be focused on “clarification” of the environmental assessment, but rather on a comprehensive analysis of MIS for the first time in the context of the proposed amendment.**

The issue of MIS program assessment has been found to have no connection to the purpose and need for this proposed amendment (which is protection of Threatened, Endangered and Sensitive Species -TES). The effects associated with this amendment, and its alternatives, are fully recognized and displayed in the EA – including effects to all wildlife species inhabiting the GMNF (including MIS). This EA dismisses the need to fully assess the MIS program (as part of this amendment); it does not dismiss the need to assess effects of the amendment to GMNF’s wildlife (including identified MIS).

- 1.2 The discussion of MIS included in the proposed appendix fails to comply with the NFMA (36 CFR § 219.19(a)(6) because it is not based on any disclosed monitoring data or trends analysis. Although the proposed appendix includes limited references to habitat for each of the MIS, the discussion is entirely conclusory and unsupported by any data or credible scientific reference.**

Our final appendix (see Appendix 7) displays available trend information, along with the source of that information. It is important to re-iterate our findings disclosed in the EA - that this amendment and its alternatives are unlikely to have detectable effects to any of the GMNF MIS populations.

- 1.3 A comment was made that the proposed appendix fails to recognize the purpose of MIS; that the NFMA planning regulations require the identification and use of MIS to guide planning and management decision making 36 CFR § 219.19(a)(1). Because the GMNF lacks adequate data and analysis supporting credible estimates of trends and population levels,**

consideration of MIS cannot provide guidance for planning and management decisions.

We disagree with assertion that our current MIS program weaknesses render the program useless; this program continues to provide basis for project assessment, as respective projects affect the important habitat communities of the GMNF. Our assessment of this proposed amendment, and its alternatives, finds that no detectable changes will occur to these important communities, nor to the population of wildlife species dependent upon these communities.

- 1.4 There is concern that the GMNF must have adequate data and is required to have completed population analyses prior to, and as foundation for, development and consideration of planning alternatives, including complete data and analysis of current and future MIS habitat and population trends to design appropriate alternatives to assure protection of TES species. Without this information, there is no analysis, which leads to the conclusion that that none of the MIS on the GMNF are affected by any of the alternatives selected.**

This proposed amendment holds no element of planning development; the GMNF's management assessment still remains the EIS of 1987. This amendment proposes no adjustment to the GMNF's mix and location of wildlife communities – rather, this amendment proposes to better conserve important habitat components (important to TES species) located across all wildlife communities.

- 1.5 A comment was made that MIS information must be considered as a basis for developing and evaluating all planning alternatives. 36 CFR § 219.19(a) and that (“Each alternative shall establish objectives for the maintenance and improvement of habitat for management indicator species”); § 219.19(a)(2) (“Planning alternatives shall be stated and evaluated in terms of both amount and quality of habitat and of animal population trends of the management indicator species”).**

As discussed in the previous comment/response, this amendment holds no effect to GMNF planning assessment and decisions. We are not proposing to change decisions of the 1987 ROD.

- 1.6 The commenter went on to say that the GMNF has failed to satisfy these requirements by failing to state any of the proposed alternatives considered in the environmental assessment are based on data and analysis of MIS populations let alone habitat and trends. Similarly, no meaningful effort has been made to evaluate the alternatives selected in light of MIS information.**

The purpose and need for this proposed amendment is to better conserve important T&E habitat components irrespective of the wildlife community in which these components occur. Our assessment indicates that these adjustments (to habitat component conservation) are appropriately made across all MIS communities – and

that development of alternatives, to address MIS issues, are not needed. Both the EA and the MIS appendix discuss how differing T&E habitat management adjustments effect MIS species populations and GMNF wildlife communities.

- 1.7 The comment was also made that the proposed appendix is limited to addressing only the preferred alternative and possible impacts Indiana bats. The proposed amendment addresses sensitive species and other threatened and endangered species as well in several (although insufficient) alternatives. This limited focus does not satisfy the GMNF’s legal obligations and will assure that any alternative selected will be inadequate to protect TES species.**

The EA and MIS appendix clearly assess effects of all alternatives developed in response to the purpose/need and citizenry scoping. The “focus” is indeed “limited” to the purpose/need of updating LRMP direction to better protect TES species – we disagree that our selected alternative is inadequate.

- 1.8 A comment was made that the GMNF immediately commence preparation of an Environmental Impact Statement, and reopen the public comment period after full disclosure of the MIS data and analyses relied on to support the conclusions contained in the proposed appendix.**

As explained under responses 1.1, 1.2 and 1.3, concerns with MIS are outside of the purpose and need for this proposed amendment, and the EA findings (including Appendix 7) disclose that the proposed amendment and its alternatives would not have detectable effects to MIS populations. Thus, we do not find the MIS issue to be significant one, and have proceeded with issuing a “Finding of No Significant Impact.”

Appendix 9

Summer 2001 Correspondence with the U.S. Fish & Wildlife Service

