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502 8th St NE #24
Auburn WA 98002-4361
February 24, 2006

Sally Butts, Project Manager
U.S. Fish and Wildlife Service
510 Desmond Drive S.E., Suite 102
Lacey, WA 98503-1273

Dear Ms. Butts:

Thank you for inviting these comments on the FPHCP.

It appears that the proposed Alternative is a compromise that would foreclose conversion of private forest lands to non-forested use. This is an assumption.

The 50-year proposed term of ITPs issued by each of the Services seems excessive. Perhaps, when all the requisite guidelines are in place and relevant monitoring data are obtained, the forest practices themselves, the limits, and the proposed term of ITPs will be modified. What triggers "periodic review" of a Section 4(d) limit? Is there enough flexibility in cooperative adaptive management techniques to accommodate for a deepening awareness of ecological principles and their practice? We seem to know so little about the way the world works, and 50 years is a long time in that context.

Sincere regards,
Mary Roberts
WSU Cooperative Extension / King County
Urban Watershed Steward