

Appendix 5
Response to Comments
on the Draft Post-delisting Monitoring Plan
for the West Virginia Northern Flying Squirrel

The Service published a notice in the Federal Register on October 9, 2007, announcing the availability of the draft Post Delisting Monitoring (PDM) Plan for the West Virginia northern flying squirrel (WVNFS) (dated September 2007) and requesting public comments by November 8, 2007 (72 FR 57346). The plan was available by request, and posted on our website at: <http://www.fws.gov/northeast/angered>. We also posted a news release and individually notified by e-mail a representative of all entities that had provided substantive comments on the proposed rule to delist the WVNFS. Concurrent with the public comment period, the Service solicited comments on the plan from five independent scientific experts.

We received a total of 4 substantive comment letters on the PDM plan and 254 form letters during the 30-day comment period. One of the 4 substantive letters was from a coalition of 17 environmental groups (hereafter referred to as the Coalition).

The Federal Register notice noted that the comment period on the PDM plan was not a reopening of the comment period on the proposed rule to delist the WVNFS. Two of the four substantive comment letters we received reiterated issues submitted on the proposed delisting rule for the WVNFS. We have responded to these issues as part of the final rule on the WVNFS and do not repeat them here. Where issues on the PDM plan overlap with issues previously raised on the proposed rule, we cross-reference responses.

Below we summarize and respond to the substantive comments received on the PDM plan. We have highlighted in bold the minor changes we made to the plan as a result of public comment. We also updated and added a few supporting references.

A. Habitat

Comment 1: The Coalition disagreed with the PDM plan's focus on monitoring of habitat. They believe the plan focuses on monitoring of red spruce and ignores northern hardwoods. They also interpreted the monitoring threshold for habitat to be limited to the loss of red spruce.

Response: The Service believes that the emphasis of the PDM plan on monitoring of habitat is appropriate. Historic habitat loss, conversion, and degradation were the primary threats to the WVNFS identified at the time of listing (50 FR 26999). Amelioration of these threats to habitat is the primary factor supporting the proposal to delist the WVNFS (71 FR 75924). A preponderance of data show that the WVNFS relies heavily upon the red spruce forest and the mixed red spruce-northern hardwood forest (Menzel et al. 2006a, Ford et al. 2004, Stihler et al. 1995). There are no data in the central Appalachians that show that the WVNFS depends upon pure hardwood forests. In those places where the WVNFS has been captured in stands dominated by overstory hardwood trees, there also has been a conifer understory and/or some overstory red spruce or eastern hemlock (Stihler et al. 1995). (For further detail, see response to comment F, Ecosystem and Habitat Concerns, issues 4 and 5, in the final rule). Therefore, the

PDM plan monitors forests of red spruce, as well as mixed forests of red spruce, other conifers, and northern hardwoods. The habitat trigger specified on page 18 of the PDM plan refers to all of these forest types.

Comment 2: The Coalition stated that the PDM plan fails to address habitat connectivity and linkages between populations.

Response: The status section of the PDM plan addresses baseline conditions for habitat connectivity and linkages (pages 5-6 and Figure 1). [For further details, also please see response to comment B (Population Concerns), issue 3, in the final rule.] The PDM plan includes provisions to monitor, analyze, and report on habitat connectivity and linkages as stated on pages 13, 15, and 20 of the methods and reporting sections.

Comment 3: The Coalition stated the PDM plan fails to address forest structure, including the association of WVNFS with old growth trees, snags, and coarse woody debris.

Response: Forest structure is addressed on pages 3 and 13 of the PDM plan, including the association of WVNFS with old growth trees, snags, and coarse woody debris. The Monongahela National Forest (MNF) will report on implementation of management prescription (4.1), which focuses on growing older, uneven-aged stands that the WVNFS seems to prefer. At the stand level, desired future conditions include a mix of trees of different age classes, complex vertical habitat structure, scattered over-mature trees, and abundance of snags and downed woody debris (USDA Forest Service 2006a, p. III-12-13).

Comment 4: The Coalition expressed concern that the PDM plan had not considered the association of WVNFS with fungi and other food sources, or how Forest Service management would impact these food sources.

Response: The PDM plan briefly mentions fungi and food supply of WVNFS at page 3. During implementation of the PDM Plan, the MNF will report on progress toward achieving desired future forest conditions and restoration goals specified in management prescription 4.1 of the Forest Plan. Desired future conditions include an abundance of snags and downed woody debris which provide substrates for fungi and other food sources. Similarly, the George Washington National Forest will report on progress toward maintaining late successional old growth and mature forest which provides the type of habitat supporting the food supply of the WVNFS (USDA Forest Service 1993, 1997). The Service believes that monitoring of WVNFS habitat and the implementation of management measures is adequate to indirectly monitor food sources, given that there is no evidence that WVNFS are underweight or otherwise limited by existing food supply in the central Appalachians.

B. Population

Comment 1: One commenter and the Coalition criticized the PDM plan for using the same protocols and methods that have been used for decades and stated that this type of monitoring is insufficient to reveal population status or trends. One commenter indicated there are newer techniques that are more cost-effective and non-invasive for detecting presence and uniquely

marking and tracking the movement of individual northern flying squirrels. This commenter did not provide specific details or literature citations on these newer methods. This commenter also indicated that it was unclear whether these newer, more efficient techniques would produce sufficient data to meet PDM objectives.

Response: The Service agrees with the commenters that monitoring the status and trends of WVNFS populations is challenging. Given the area over which the WVNFS occurs, and its naturally patchy distribution, cryptic nature and low detectability, it is impractical to determine population sizes rangewide. Many thousands of live traps and nest boxes likely would be required to sufficiently sample enough representative sites that would allow for extrapolation of population sizes at a landscape level. As further explained in the response to comment B (Population Concerns), issues 1-4 in the final rule, the Service believes that persistence over time (multiple generations) provides sufficient information to yield a coarse indicator of population trend rangewide.

Baseline data on distribution and persistence of WVNFS collected over 20+ years were adequate to inform the decision to delist the WVNFS. Wholesale switching of techniques at this stage would be counterintuitive as there would be no historic baseline conditions (using comparable techniques) for comparison to the PDM period.

We have, however, considered the utility of the newer techniques as a non-essential or ancillary effort to the PDM plan. We contacted the commenter for more information about these techniques, which have not yet been published for northern flying squirrels. They involve a modification of live traps that results in collection of hair samples, and the marking of individual animals by ingestion of radio-isotope laced baits. Unique radio-isotope signatures show up in subsequent hair samples. Researchers collect and analyze the hair samples to identify the species and the individual animal that left the hair. These hair samples also can be used to track the movement of individual animals.

Provided that radio-isotopes are not harmful to the health of WVNFS, these newer techniques may be useful for finding new locations of WVNFS in a more efficient manner (contributing to information on distribution). They also may be useful for determining WVNFS movements (contributing to information on dispersal and functional connectivity). We will consider their use for these purposes during the PDM period, as funding and staffing allow.

Comment 2: The Coalition believes that the PDM plan should combine presence/absence data with population and distribution data to monitor viability and population trends.

Response: The PDM plan, in combination with ancillary efforts by the MNF, does just that. The PDM plan uses presence/absence data over time to assess distribution and persistence of WVNFS rangewide. Although not an essential element of the PDM plan, the Service will consider information on WVNFS population viability that the MNF intends to collect at sites on the Forest. **In footnote 3 of the PDM plan, we have clarified the MNF's intent to collect WVNFS population data that can be used in viability assessments on the forest.**

Comment 3: The Coalition was confused by a reference to the West Virginia Conservation Action Plan (CAP) on page 2 of the draft PDM plan. They interpret the CAP to include a commitment by the West Virginia Division of Natural Resources (WVDNR) to determine actual WVNFS population sizes. They asked when and why the “scientific monitoring of actual squirrels” was dropped for the “unscientific proxy” of habitat monitoring. They noted changes in the page citations for the CAP between draft and final versions and asserted that information on WVNFS was no longer contained in the CAP posted on the WVDNR webpage.

Response: The PDM plan for the WVNFS is consistent with both the draft and final versions of the CAP. The Service knows from discussions with WVDNR staff during PDM plan development that the WVDNR never intended to monitor actual WVNFS population sizes, but rather to continue its presence/absence monitoring for WVNFS under both the CAP and the PDM plan.

Contrary to the Coalition’s assertion, the WVNFS sections have not been “removed” from the CAP on the WVDNR webpage. The final CAP is posted at the bottom of the WVDNR homepage at www.wvdnr.gov or can be accessed directly from this link: www.wvdnr.gov/PDFFiles/wwwcap.pdf (last accessed on August 19, 2008). **We have updated the page references in the PDM plan to refer to the new page numbering system in the final CAP.**

With respect to habitat monitoring, the PDM plan follows commonly accepted scientific methods for vegetation analyses. This includes the use of a GIS-based landscape approach that involves interpretation of aerial photography or satellite imagery to quantify habitat acreages, and ground-truthing a representative sample of sites at the stand level.

C. Potential Threats

Comment 1: The Coalition was concerned that the PDM plan does not directly monitor disease, loss of mates, nesting sites, and increases in predators and competitors. The Coalition also stated that the PDM plan fails to monitor a host of potential habitat threats including acid rain, global warming, timbering, private land development, highway construction, and energy development.

Response: None of the potential threats listed by the Coalition are significant threats today or for the foreseeable future (see the Summary of Factors Affecting the Species in the final rule). Thus direct monitoring of all of these factors is not essential for the PDM plan effectiveness at this time. Rather, the PDM plan focuses on monitoring of overall habitat quantity, quality, and connectivity (see pages 12-15). The Service anticipates that data collection to satisfy PDM requirements will generally be a subset of the data that was collected in support of the delisting rule. PDM plans should not contain more intensive monitoring methods than those that were implemented during the recovery effort or to assess whether delisting was warranted.

D. Monitoring Thresholds

Comment 1: The Coalition stated the PDM plan does not measure whether delisting is needed. They believe the PDM plan should assess the recovery plan criteria for delisting and downlisting.

They also stated that, following delisting, the PDM plan will not measure whether the population has declined substantially, triggering the relisting of the WVNFS.

Response: The purpose of a PDM plan is to establish a plan to monitor the status of a species after it is delisted to ensure that relisting is not necessary. A PDM Plan does not need to analyze achievement of recovery plan criteria for downlisting or delisting, and is not a document that makes recommendations on whether delisting is appropriate. For these analyses, please see the final WVNFS delisting rule and Service (2007).

The PDM plan (pages 17-19) contains measurable triggers as an early warning system for judging whether the status of the WVNFS is significantly declining. These triggers measure changes in WVNFS habitat, distribution, and persistence. Monitoring of WVNFS persistence is serving as a coarse indicator of population response to potential threats. While population numbers would be useful, they do not need to be known to list or relist a species. The Service can list or relist a species based on any one or more of the five threat factors named in section 4(a)(1) of the Endangered Species Act.

E. Plan Duration and Reporting

Comment 1: The Coalition believes that a 10-year PDM period is an insufficient period to assess the viability of the WVNFS. They state that any PDM plan should follow the example of the American peregrine falcon where monitoring efforts are spread out over a “much longer” time frame.

Response: The Service tailors the duration of post-delisting monitoring to the biology of individual species. As explained on page 20 of the PDM plan for the WVNFS, we believe that 10 years is adequate to monitor habitat, distribution, and persistence of this subspecies, as well as the effectiveness of implementation of management plans. Ten years of monitoring WVNFS is not a substantially longer time period than the 13-year monitoring period specified in the peregrine falcon PDM plan (Service 2003).

The PDM plan for the peregrine falcon specifies monitoring every 3 years, spread across a total 13-year period (Service 2003). This makes sense for the peregrine falcon because it is easier to detect than the WVNFS. Because peregrine falcons are active during the day, and their aeries typically are exposed, they can be checked with binoculars from afar to determine if the birds are nesting and if they are successfully producing young. This is not the case with WVNFS, a cryptic species, active at night, which nests in tree cavities and canopies. The failure to detect a WVNFS on any given visit does not mean that WVNFS is not present. Checking a site once every three years would fail to detect WVNFS at many sites, when in fact they may actually be present. Annual checks are needed to document presence of this cryptic subspecies.

Comment 2: The Coalition expressed the view that waiting 10 years to conduct a threats assessment at the end of the PDM period “is unconscionable and irresponsible.” They doubted whether the Service would complete this review in a timely fashion.

Response: As long as habitat, distribution, and persistence trends continue to be stable or improving, there is no need for a more frequent analysis and reporting of threats. The Service is committed to timely completion of reports. This includes annual, interim (5-year) and final (10-year) reports. The Service will solicit and review annual reports from each participant to ensure that the monitoring thresholds have not been met or exceeded in any year, or cumulatively across years, before the end of the 10-year PDM effort. **We have clarified in the PDM plan on page 20 that the reporting schedule does not prohibit participants or members of the public from submitting information to the Service on perceived threats at any time during the PDM period.** The Service will review and analyze the significance of these potential threats at the time they are received, and take action as appropriate.

Comment 3: The Coalition considers self reporting by agencies to be insufficient because they believe the WVDNR's Conservation Action Plan (CAP) and the MNF's Forest Plan can change without public notice.

Response: We do not anticipate the agencies would make major changes to the CAP or Forest Plan without public involvement. Both the CAP and the Forest Plan include provisions for continuing public involvement during plan implementation and/or during plan revision processes (WVDNR 2006, section 8; USDA Forest Service 2006a, p. IV-5). The CAP includes a biennial coordination symposium to receive input from public and private partners (including local conservation organizations) on the status of species and habitats, and to prioritize work items (WVDNR 2006, pp. 6-3; 8-1, and App4-1 to 4-3). The Forest Plan notes that the MNF will develop a strategy for involving the public and other agencies in the planning, execution, and evaluation of Forest monitoring each year (USDA Forest Service 2006a, p. IV-5).

We have added clarifying language to page 20 of the PDM plan stating that participants will annually report on any changes to monitoring or management plans for the WVNFS, including the WVDNR's Conservation Action Plan and the MNF's Forest Plan. We have also clarified on page 21 that annual PDM reports will be made available to the public upon request.

F. Implementation and Funding

Comment 1: The West Virginia Division of Forestry (WVDOF) supported the PDM plan and offered to help with continued nest box monitoring on the Kumbrabow State Forest. The Director/State Forester also expressed intent to maintain and enhance habitat and connectivity for WVNFS on Kumbrabow State Forest.

Response: We appreciate the intent of the WVDOF to assist with monitoring and management of WVNFS and its habitat.

Comment 2: One commenter expressed confidence that the Forest Service could easily meet the goals and objectives of monitoring habitat changes during the PDM period, given existing data bases and well-trained and experienced staff.

Response: We agree. Comment noted.

Comment 3: One commenter and the Coalition expressed concern about adequate financial support to implement the PDM plan, pointing to declining workforces and budgets. The Coalition also alleged that the Forest Service had failed to conduct comprehensive monitoring of the WVNFS in the past and to report on any of its monitoring activities.

Response: We fully expect the agencies to be able to implement the essential features of the PDM plan, given that these costs are comparable to, or less than, recent past expenditures by the agencies. Both the Forest Service and the WVDNR have conducted a similar monitoring program in the past, with the WVDNR taking the lead role in compiling presence/absence data collected by both agencies and preparing reports, and the Forest Service taking a lead role in mapping habitat.

Although no agency can predict its budget in future years, two Endangered Species Act funding sources are available to the WVDNR for WVNFS continued monitoring (post-delisting monitoring funds, and funds for implementing the Conservation Action Plan). We believe these factors will ameliorate any impacts from future unpredictable budgets.

Comment 4: The Coalition doubts that the MNF will fulfill its ancillary role in analyzing and reporting on forest health pursuant to the Forest Plan. They note that the Forest Plan contains broad monitoring and evaluation requirements and that a separate monitoring implementation guide with more specific details has not yet been written. They assert that no monitoring of forest health has occurred to date. They are concerned that even after the implementation guide is written, it will not include mandatory measures and can be changed at will pursuant to adaptive management.

Response: The commenters are correct in noting that monitoring of forest health by the MNF is ancillary to the PDM Plan (as noted in appendix 1). Monitoring of forest health is not essential to PDM plan effectiveness because such threats are not currently significant and will be well monitored for the foreseeable future through provisions of the Forest Plan (USDA Forest Service 2006a, chapter IV). (For more details, see the final rule, summary of factors affecting the species.) Ancillary information on forest health will be accepted by the Service at any time, reviewed promptly for significance and appropriate action, and synthesized in the final PDM report.

Prior to completing its implementation guide for monitoring forest health, the MNF currently is completing baseline data analysis on forest health, including a comprehensive report on 12 red spruce-northern hardwood monitoring plots located throughout the range of the WVNFS. Stand data on trees, saplings and seedlings, soil chemistry, red spruce foliar chemistry, and the percent coverage of red spruce roots by symbiotic fungal mycorrhizae are being compared between two sampling periods--1985 (time of WVNFS listing) and 2005. This report is expected to be completed in 2008 or 2009. Preliminary results indicate that the condition of live red spruce had improved at all 12 sites by 2005--a reversal of the crown dieback conditions observed in 1985 (S. Connolly, MNF, pers. comm. 2007). The MNF also has made good progress completing preliminary studies to develop a study to monitor WVNFS populations (see footnote 3 to the PDM Plan).

Monitoring of certain aspects of forest health is required by the National Forest Management Act (NFMA). Table IV-3a in the Forest Plan identifies mandatory monitoring items required by NFMA. These include, but are not limited to, monitoring of: (1) forest insects and disease and the effectiveness of suppression processes, (2) changes in forest productivity, and (3) status of wildlife management indicator species (USDA Forest Service 2006a, pp. IV-6 to 7).

Other monitoring items are more flexible and are tailored to address issues raised during public comments on the Forest Plan (USDA Forest Service 2006a, Table IV-3b, pp. IV-8 to 12). These items include monitoring of acid deposition, soil productivity, wild fires, and effects on vegetative communities, structure and composition. These items may change through time as indicated by monitoring evaluation results and recommendations. Because this approach includes an adaptive management strategy, the MNF will incorporate frequent public feedback to facilitate monitoring activity prioritization, protocols, evaluation, and ultimately better informed decisions. A strategy for involving the public and other agencies in the planning, execution, and evaluation of forest monitoring will be formulated each year (USDA Forest Service 2006a, p. IV-5).

G. Peer Review

Comment 1: The Coalition requested a new review of the PDM plan, 5-year status review, and proposed rule by a “pool of professionals who can be objective about this proposal.” The Coalition alleges that the peer review process that the Service used violates Endangered Species Act “regulations” enacted on July 1, 1994 (59 FR 34270) and the Office of Management and Budget draft peer review guidelines issued on August 29, 2003.

Response: The Service believes that its peer review processes for all of these documents were consistent with policy and guidelines. Because peer review of the 5-year status review and proposed rule is outside the scope of the PDM plan, we will not further address it here.

With respect to the PDM plan, prior to the opening of the public comment period, the Service solicited comments from eight scientific experts who have extensive practical experience monitoring the WVNFS and its habitat in the central Appalachians. Because successful development of PDM plans requires input from the individuals who will implement it, the Service involved these entities in developing and reviewing a draft of the PDM Plan prior to public comment. This initial review was not intended to be a peer-review process.

During the public comment period, we also sought expert review of the PDM plan by five scientific experts who were not involved in drafting the PDM Plan. These experts were independent of the Service and have scientific knowledge and experience working primarily with other northern flying squirrel subspecies in the southern Appalachians, northern Appalachians, and the Pacific Northwest. Although we sought expert review from five independent experts, only one of these individuals ultimately provided comments on the PDM plan. There are a number of reasons beyond the Service’s control why an expert may choose not comment. For practical reasons, our peer review policy requires that we seek advice, but does not require that we receive it.

The July 1, 1994 document cited by the Coalition as a “regulation” is a statement of Service policy for peer review of Endangered Species Act activities (59 FR34270). The policy states that the Service will solicit peer review on listing recommendations and draft recovery plans from at least three independent scientific experts. It does not require peer review of PDM Plans. Rather, the policy notes that it is within Service discretion to seek “expert opinions” at other times when deemed necessary to clarify a scientific question. Thus, consistent with policy, the Service sought expert opinion on the PDM plan, rather than official peer review.

In addition to the Service policy on peer review noted above, the Office of Management and Budget published a final information quality bulletin for peer review in the Federal Register on January 14, 2005 (70 FR 2664). This bulletin established minimum standards for when peer review is required for scientific information and the types of peer review that should be considered by agencies in different circumstances (70 FR 2666). At a minimum, peer review is required for “influential” scientific information, defined as “scientific information the agency reasonably can determine will have or does have a clear and substantial impact on important public policies or private sector decisions” (70 FR 2667). For this class of documents, the OMB guidance gives agencies broad discretion in deciding what type of peer review is appropriate and what procedures should be used to select appropriate peer reviewers (70 FR 2668).

The Service has determined that the PDM plan for the WVNFS does not meet the definition of “influential” as defined by the OMB bulletin because it is not a final agency action and has no regulatory impact under the Endangered Species Act. Hence this PDM plan does not have a clear and substantial impact on important public policies or private sector decisions. Information contained in the PDM plan, and subsequent reports, may be used at a later time in a proposed rule to relist the WVNFS should its status significantly decline following delisting. At that time, should a specific proposed rule to relist the WVNFS be issued, peer review will be conducted pursuant to Service policy, and pursuant to the OMB bulletin if the action meets the OMB definition of influential.

H. Miscellaneous

Comment 1: The Coalition expressed the view that it was difficult for the public to comment on the PDM plan. They alleged that a staff person listed as the contact for the PDM plan in the Federal Register notice “denied being the contact person” when contacted by the Coalition. They also stated the website portal for commenting was not available, and that an alternative e-mail address for commenting was not made available to the public. They believe “that any number of people may have lost their opportunity to comment.”

Response: In an effort to make it as easy as possible for the public to comment on the PDM Plan, and to provide backups in case any method failed, the Service identified in the Federal Register notice a list of five ways in which the public could comment: (1) regular mail; (2) hand delivery; (3) electronic mail to the staff contact person; (4) facsimile; and (5) the Federal eRulemaking Portal.

Unfortunately, at the time the Service published the Federal Register notice for the PDM Plan, we did not realize that the eRulemaking portal currently only applies to rules and is not set up to receive comments on non-regulatory documents such as PDM Plans. The eRulemaking Portal referred the public to the instructions for submitting comments in the Federal Register notice. When the Service realized this problem, we posted on our regional website a notice stating that the 5th option was not available; however, comments could be submitted by any of the other four options.

Anticipating that the Coalition might be facilitating a form letter campaign on the PDM plan, Laura Hill, the Service staff person who is the lead contact for the PDM plan, sent an e-mail on October 10, 2007 to the lead coordinator for the Coalition (the Director of the Friends of Blackwater, FOB). In this e-mail, Ms. Hill attached the notice, reiterated the 5 ways to submit comments, noted the problem with the eRulemaking portal, and specifically requested that any mass mailings (such as form letter responses) be sent to an alternative e-mail address: wvnfscomments@fws.gov.

On November 7, 2007, Ms. Hill began receiving form letters generated from a FOB computer system. The number of responses began to overload the network capacity of the field office and responses began to bounce back as undeliverable to FOB (Brandae Mullins, FOB, phone message to Laura Hill, Service, on November 7, 2007). Ms. Hill promptly returned Ms. Mullins' call and identified solutions to the problems presented. She reiterated that form letters should be sent to wvnfscomments@fws.gov so as not to overload the Service's computer network. Ms. Mullins agreed to this procedure and the problem was corrected that day (e-mail from Laura Hill, Service, to Brandae Mullins, FOB, dated November 7, 2007).

Arrangements were also made for Ms. Mullins to send by regular mail all form letters that had bounced back. The Service agreed to count, and has counted, these form letters as being submitted in a timely manner (e-mail from Laura Hill, Service, to Brandae Mullins, FOB, dated Nov. 13, 2007). To date, the Service has not received complaints from any member of the public that they were not able to submit comments by one of the alternative ways in which comments could be submitted.

Comment 2: The Coalition stated that supporting documents were not readily available to the public for review. In particular, they note that the public had no opportunity to review personal communications or unpublished data cited in the PDM plan.

Response: The Federal Register notice included contact information (name, phone number, address, e-mail address, facsimile) for requesting more information (72 FR 57346) and noted that supporting documents were available for inspection, by appointment, at the Service's West Virginia Field Office (72 FR 57347). To date, no one has contacted the Service to request an appointment to view supporting documents.

On November 7, 2007, two days before the close of the comment period, Ms. Brandae Williams of FOB, mentioned in the above referenced phone conversation with Laura Hill, that FOB would like to receive "as soon as possible" copies of all references cited in the PDM Plan, including personal communications. Ms. Hill suggested that the quickest way to view references was for a

representative of FOB to make an appointment to visit the West Virginia Field Office. Ms. Mullins declined. Ms. Hill also indicated that the field office was in the process of scanning all of the documents into an electronic format and that they would send Ms. Mullins a cd-rom with the documents when the scanning was completed. Since then the Service has provided this cd-rom to Ms. Mullins.

Comment 3: One commenter noted that the PDM plan is comprehensive and addresses the key factors that could impact the WVNFS, with an appropriate emphasis on public lands where the majority of WVNFS habitat occurs. They noted opportunities to enhance landscape level conservation by recognizing private landowners involved with forest certification programs for the red spruce ecosystem.

Response: We appreciate the support and will look for opportunities to partner with private landowners. One venue for such participation is the ongoing recruitment of private landowners to sign on as cooperators pursuant to the red spruce-northern ecosystem Memorandum of Understanding (Service et al. 2007).