# Public Comment Analysis

| Letter | Comment | Response |
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| 1 . | Thanks for all the information; no further comments | 3C |
| 2 . | We do not feel that current livestock grazing is being over-applied or mis-applied. We have confidence that the Forest Service management plans will give positive direction to the application of grazing management as it relates to the Northern Goshawk. Current livestock grazing management plans do not appear to have negatively affected the Northern Goshawk. We ask that you allow the current grazing management plans to work in the management of the Northern Goshawk. | 3D |
| 3 . | Feel that the alternatives which did not propose harvest of timber would not meet healthy forest objectives. | 3D |
| 4 . | Guideline implementation in spruce stands with ages of 200+ would be very susceptible to spruce beetle. The alternative selected should allow prompt removal/salvage so that beetle problems can be managed efficiently and timely. Selected alternative needs to allow harvest and removal. Forest treatment is necessary to maintain/improve habitat. Those alternatives which do not manage vegetation lead to unacceptable consequences and do not meet proposal objectives. | 3D |
| 5 . | ... the Forest Service should adopt Alternative F as the option best suited for conserving goshawk populations. This alternative has the added benefit of best benefiting sensitive, threatened, and endangered species associated with goshawk habitat. This alternative will be least likely to lead to Federal listing of species. | 3D |
| 6 A | Why should we consider prohibiting or limiting management of our national forests. The Forest Service is directed to take charge of land management. I think the Forest Service should do the job! The Forest Service should include local managers and consider each area and manage for future desired conditions. Not simply prohibit activity and deny access. The suspension of management on part of our resource rich, National Forest by prohibiting management is a luxury this country can not afford. Doing nothing with our national forests land is wrong. Trees, grass, and water are renewable resources. All the land should be managed to promote good land use. The key is the word use. Renewal is only possible when conditions are managed. Common sense and economic reality and on the ground action in a timely fashion is what's needed. | 3C |
| 6 B | The environmental consequences of the cumulative effects of past practices has not been fully measured. | 2B6 |
| 6 C | Public comment opportunities have led the way for paid radicals to dictate protectionism. The status quo they seek is turmoil. The gain they seek is personal gain. The comment process is not working. Our forests are in bad shape because past management was stopped short. I think review of forest management is needed. An oversight team is a good idea and will help balance the radical and ridiculous who believe to protect is to waste forest resources. | 3C |

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| 6 D | Roadless and unroaded has also been poorly inventoried. Some unroaded areas may be needed, but unmanaged area is not needed. To much is at stake to leave the forests to chance. | 2B5 |
| 7 . | ... stating my support of Alternative F because I see it was the best method to place the agency responsible in charge of goshawk management. I believe this alternative allows the Forest Service to do what it feels necessary when it feels action is required and that implementation of this alternative will adequately protect goshawks well being. | 3D |
| 8 A | Appendix A, S-9 (vegetative manipulation) pages A-6,7 could present a real problem for our processes having an active nesting time constraint which could possibly prohibit Carbon and Emery Counties from maintaining their "B" county roads or any active Forest agreement public roads on the Manti LaSal. The active nesting period normally occurring between March 1st and September 30th exactly coincides with the only available intervals of time in which we can perform necessary road maintenance. Periods earlier or later are unrealistic due to the high elevational weather disadvantages characteristic of our region. | 1D5 |
| 8 B | I have received the Utah Northern Goshawk Project EA and feel the answers to your assessment questions are adequate to cancel any goshawk concerns in our region. | 3C |
| 9 A | ... Utah Northern Goshawk Project Environmental Assessment ... is not acceptable and I do not trust it, as is, because: it demonstrates that it is not serious about preserving biodiversity and sensitive species habit. It allows all uses everywhere including destructive uses. | 3B |
| 9 B | None of the alternatives presented is acceptable. Instead an Environmental Impact Statement (EIS) must be prepared that includes analysis of all science and places priority on Northern Goshawk habitat requirements. | 2B1 |
| 9 C | Further fragmentation of mature forests should not be tolerated. We need to protect the connection and linkage zones of mature forests and restore that connection as far as possible, not fragment it. Northern Utah's forests are ecologically-linked with those of the Greater Yellowstone Ecosystem because they are both a part of the Utah-Wyoming Rocky Mountain Ecoregion. The Northern Goshawk is also a part of the native fauna that is shared by both Greater Yellowstone Ecosystem, so how well we protect the wildlife that is shared by both Greater Yellowstone and Utah will serve to protect the native wildlife of both areas. | 1C2 |
| 9 D | The EA doesn't properly address livestock impacts that depletes forage for the goshawk prey base. The negative environmental impacts of all forest uses should be adequately and honestly addressed. Any use that depletes the forage of prey bases of goshawks and any other native wildlife should not be allowed.˝ | 1E2 |

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| 9 E | ... the Utah Northern Goshawk Project Environmental Assessment ... is not acceptable and I do not trust it, as is, because … its promises to "monitor" are only empty promises, not sincere ones. This only serves to maintain the status quo and it is not being honest with all citizens, just caters to certain special interest groups. | 3A3 |
| 9 F | If any of the Alternatives in this EA are accepted, the result will be further fragmentation of mature forests and decline of sensitive and other species. These alternatives are a recipe for extinction for sensitive species and then for all other native species of plantlife and wildlife. I don't want any kind of extinction, destruction of the native ecology or native biodiversity in Utah's forests or those forests and ecosystems that are historically and biologically linked with Utah's forests. | 3B, 1C2 |
| 9 G | If any of the Alternatives in this EA are accepted the Forest Service will be unlimited in its ability to accelerate timber harvest under the guise of "forest health" or protecting goshawk. Utah's forests don't need timber harvest. Humans need these forests for adequate oxygen supplies, fresh air, protection against global warming which our forests do provide, a buffer zone against noise, and a place of solitude to heal mentally and spiritually. Timber harvest does not provide or protect forest health. That is a pseudo-scientific falsehood. We need to protect all old-growth and mature forest habitat in order to protect and preserve the northern goshawk. | 3B |
| 10 . | I support multiple use of all national forests and I consider the proposal or initiative F to be reasonable responsible and one I could support. | 3D |
| 11 . | I support multiple use of all national forests and I would consider the proposal F to be reasonable and one I could support. | 3D |
| 12 . | I support multiple use of all national forests and I would consider the proposal or initiative F to be reasonable and one I could support. | 3D |
| 13 . | I support multiple use of all national forests and I would consider the proposal F to be reasonable and one I could support. | 3D |
| 14 . | We are a small ranching family that uses the national forest as part of our ranching rotation. We use it by choice … make a living off the land and also improve the national forest. There is too much input from special interest bureaucratic groups. Please choose option F concerning the goshawk issue. | 3D |
| 15 . | … Please register my opposition to any special interest group that wants to do anything other than the Forest Service would recommend for the best good of all potential Forest users present or future. | 3C |
| 16 . | … we support Alternative F concerning the Goshawk and support harvesting dead timber in our Utah mountains. We also support the use of ATVs on existing roads on public lands. | 3D |
| 17 . | Yes - we support the US Forest Service's finding that lawful multiple use does not threaten the goshawk habitat in our Utah National Forests. Also, that Alternative F is the preferred temporary action to address this "finding of nonsignificance." | 3D |

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| 18 . | Yes - we support the US Forest Service's finding that lawful multiple use does not threaten the goshawk habitat in our Utah National Forests. Also, that Alternative F is the preferred temporary action to address this "finding of nonsignificance." | 3D |
| 19 A | We have significant reservations with the Utah Northern Goshawk Project Environmental Assessment (UNGPEA). Many of these concerns we raised in earlier scoping comments. Even though the EA conceivably has a life span of 4-6 years depending upon the ease and speed of forest plan revision it is consequential in that direction in this document will likely be simply lifted into the revision process. And therein lies the crux of the conflict with this EA. Not to mention the fact that the EA notes Alternative B is the proposed action but the October 1999 Draft FONSI is based on Alternative F. | 2B4, 2B5 |
| 19 B | Clearly Alternative E is the best alternative to protecting goshawk in Utah. It would be made a much better alternative if all goshawk territories are permanently protected. This would include those territories that may not be occupied at present. There should be a curtailment of all logging in unmanaged and unlogged areas and no logging within any nesting area or post fledging area, again whether occupied/active or not. | 1D5 |
| 19 C | ... goshawk literature ... the prevailing context of goshawk habitat is old and mature (unmanaged) forests with all of the physical/structural complexity of unmanaged forests with canopy closure on the high side--70-90%.Yet both Alternatives B and F emphasize a canopy closure at the lower end of what would be considered old growth/mature and unmanaged forest conditions.The majority of studies dealing specifically with foraging habitat suggest goshawks select for foraging in old growth forests over simple prey abundance as suggested in the EA. ... goshawks seems to avoid open forested areas as they forage. Alternatives B and F emphasize more of an open canopy context rather than being consistent with what the preponderance of scientific literature suggests.The EA seems to have concluded that lower canopy covers are a benefit to goshawks without any substantiation and contrary to all of the data that does exists with respect to goshawks. Then of course the alternatives that best meet this reduced canopy cover are considered best for goshawks. | 1A1 |
| 19 D | The majority of studies dealing specifically with foraging habitat suggest goshawks select for foraging in old growth forests over simple prey abundance as suggested in the EA. Furthermore, goshawks seems to avoid open forested areas they as they forage. Again Alternatives B and F emphasize more of an open canopy context rather than being consistent with what the preponderance of scientific literature suggests. The EA seems to have concluded that lower canopy covers are a benefit to goshawks without any substantiation and contrary to all of the data that does exists with respect to goshawks. Then of course the alternatives that best meet this reduced canopy cover are considered best for goshawks. | 1A1 |

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| 19 E | This is a never ending circle of denying the data that does exist while allowing for logging to further fragment goshawk habitat. It doesn't do the Forest Service proud, to say the least. The EA simply fails to analyze the data that exists against the desired habitat conditions, including foraging habitat, to determine whether they, in fact, meet the known and accepted biological constraints upon goshawk survival. The EA presents no data that the lower standards will benefit goshawks--it simply asserts that lower canopy closures and open foraging conditions are adequate. This is not an adequate analysis. In fact, the EA seems to suggest dense forests are a negative impact upon both nesting and foraging behaviors of goshawks without any explanation. There is a significant disconnect to the data referenced and at times cited and the actual alternatives. The EA simply does not explain why the agency seems so willing to management goshawks so far outside of the relevant and accepted data. | 2A2 |
| 19 F | If ever there existed a need for a full scale EIS this is it! | 2B1 |
| 19 G | We are also concerned how this process fits into the Wasatch (and Uinta) forest plan revision process. | 2B5 |
| 19 H | ... numerous issues surrounding grazing and the effects upon fire, forest density and prey base were ignored even though the primary research relied on in this EA suggests grazing restrictions are part and parcel of protecting goshawk habitat. | 4C1b, 1E2 |
| 19 I | The fact that the standards and guidelines are described in the context of silvicultural prescriptions says more than was probably intended. This is not a goshawk EA. Rather it is a timber prescription built to meet a minimum goshawk set of standards and hopefully get away with it until forest plans are revised. | 3B1 |
| 19 J | The EA notes there is no threat to viability based on the lifespan of the EA. That is offered without any substance--it is simply asserted. And it is ironic in that there has been no real viability analysis of goshawks and the relative productivity of goshawk habitat across its range in Utah. It is simply an assumption that the goshawk is viable in Utah. The Graham paper performed no actual viability analysis. Our expectations were that this effort would be initiated as a formal protocol to determine viability. As it stands now viability is assumed based on some observations and an assumption that gross habitat is equally valuable and viable across each habitat type. The research cited, including Graham, note that is not the case. This only highlights the disconnect noted above and in our scoping comments. | 1C1 |

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| 20 . | There is nothing wrong with a logging company going and getting dead or diseased timber out of a forest. The Goshawk would not be affected by this nor would any other animal or bird. Lets stop this insanity and let the people take care of the forest like God intended us to do. I don't want the forest all cut down but taking care of dead or diseased trees is for the good. It also helps our economy. We live in an area where we don't have natural gas and depend on some wood and coal to stay alive in the winter. Don't take this away from us. The lumber companies not only provide lumber for building & furniture, the scraps provide warmth in the winter for those of us that heat our homes with coal and wood. | 3C |
| 21 A | I strongly urge you to select Alternative E as it is the only one to ensure that there will be no further loss of ld-growth forests to logging. This is important to the goshawk so that it will have sufficient canopy cover in its habitat. | 3D |
| 21 B | Although non-old growth forests can be useful for goshawks they will do better if cattle grazing is eliminated in their habitat. | 1E2 |
| 22 A | All 10 telemetry studies documenting goshawk foraging behavior in North America concluded that goshawks choose to hunt in mature and old growth forests. Furthermore, all of these studies which measured canopy closure concluded that goshawks selected the highest canopy cover available. It is clear that alternatives B, C, and F by allowing canopy cover in goshawk foraging habitat to be reduced to 40% are not consistent with the best scientific information. Far from benefiting goshawks, these management schemes will create vast areas of forest avoided by goshawks. | 2A2 |
| 22 B | Mean canopy closure at most goshawk nest areas in the western US and Utah consistently falls within the range of 70-90% and points to numerous scientific studies that uphold this statistic. With the exception of Alternative E, however, all of the alternatives described in the EA specify minimum nest area canopy closures well below 70%. Only Alternative E which sets the minimum at 75% is consistent with the scientific literature on goshawk nesting habitat. | 1A1 |
| 22 C | The EA asserts that the existence of dense forests harms goshawk foraging in order to justify its conclusion that logging (I.e. thinning) these forests will benefit goshawks. But is the original premise sound? The EA does not cite a single field study which indicates that goshawks avoid or hunt less successfully in dense forests. That is because there are none. To the contrary, numerous goshawk studies show that goshawks select for mature, closed canopy forests and avoid young open canopied forests. | 1A1 |
| 22 D | The EA asserts that none of the alternatives will result in loss of goshawk viability in Utah. While citations are provided to attempt to justify its conclusion that the goshawk is currently viable in Utah, the EA contains no discussion or scientific citations to indicate why it believes the goshawk will remain viable after implementation of any of the alternatives-it simply asserts this to be the case. It does not explain how | 1C1 |

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| 22 E | ... since the Forest Service has mistakenly assumed that the levels of logging it is prescribing are not detrimental to goshawk foraging habitat, it does not adequately analyze the effects of reducing canopy cover levels below that deemed necessary by scientists who study foraging goshawks. In fact, there is not a single sentence in the entire EA which cites or discusses the dozens of scientific studies which quantify the canopy cover required by goshawks for foraging. No attempt is made to compare this information to the canopy covers prescribed by the DHC or the alternatives. What should have been the most fundamental of analyses is completely missing from the EA. The EA is bereft of any citations to or discussions of scientific studies concerning goshawk foraging habitat preference. This flatly violates the NEPA requirement to take a hard look at the likely impacts of the alternatives in light of the best available information. | 1A1 |
| 23 A | The FONSI and the EA are at odds with each other. The FONSI states that alternative F will be used for the goshawk plan. The EA states that Alternative B will be used for the goshawk plan. | 2B4 |
| 23 B | The proven best management of any land or natural resources has been when left with the local director when the local residents have been used as partners in the management decisions. | 3C |
| 23 C | It [EA] will be in conflict with the Uintah County Land Use Plan. | 1D4, 1E2, |
| 23 D | We are opposed to any degradation of access, grazing or timber happening in the Ashley NF. The degradation of any of the aforementioned will significantly restrict the customs and culture and economic base of Uintah County and its residents. | 1F |
| 24 . | From your own research it has been shown that the bird is not endangered and should not be listed as endangered. Many cattlemen may be affected by this issue. Please choose Alternative F. | 1F |
| 25 A | If you should choose to close the goshawk nesting area down to mining, grazing, logging, and road construction, you are choosing to close the livelihood of many miners, ranchers, loggers, etc. The goshawks have survived on these National Forests for centuries. You classify the goshawks as a sensitive species, but what about the livelihoods of the human species? | 1F |
| 25 B | We feel that you should follow your plan, Alternative A No Action, until you can establish that the goshawk are indeed directly affected by these areas [mining, grazing, logging, and road construction] of livelihood. | 2A1 |
| 25 C | By not allowing timber harvest, the forest service is setting up for a forest fire that could cause more damage to goshawk than any one of these livelihoods [mining, grazing, logging, road construction] could ever cause. | 1D4 |

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| 26 A | We agree that extreme events, whether naturally occurring or man-made are not always desirable in managed landscapes. However, managers should not categorically exclude management activities that emulate such events if 1) the landscape patterns produced are required to maintain a properly functioning ecosystem and 2) methods used to emulate the event are designed to retain ecosystem attributes that might be lost in a naturally occurring extreme event. | 1A3 |
| 26 B | We agree that use of native plant species should take priority over use of exotics wherever feasible. We agree that recruitment and retention of early seral tree species are essential at landscape scales. Special attention should be given to recruitment to ensure that composition is sustainable - that is, relatively stable over time when evaluated at landscape scales (10s to 100s of thousands of acres). | 4B |
| 26 C | We believe that guidelines regarding forest structural attributes are desirable. However, we caution against being overly prescriptive at any stage of planning. In practice, guidelines and prescriptions that are devised in the planning process commonly become "set in stone" and can preclude site-specific variations, implementation of innovative methods, and incorporation of new knowledge in management activities. Allowance for flexibility even for periods as short as the one anticipated for this management direction is a main tenet of adaptive management. Structural targets (examples given) should be evaluated for effectiveness and adjusted as new knowledge becomes available. Special attention should be given to the co-occurrence of certain structural characteristics, seral stages, and species compositions. Example given ... Imposition of "incompatible" structural attributes on large patches might inadvertently lead to undesirable "extreme" events outside the HRV. Structural characteristics should be managed in accordance with current and future forest health objectives. | 3A3 |
| 26 D | Standards and guidelines described in this category comprise a prudent management direction. We strongly support the notion that proper manipulation of forest vegetation can maintain and improve nest area habitat. We agree that transportation systems should minimize impact to nest areas and PFAs and that disturbance during the nesting period should be avoided. | 3C |
| 26 E | There are two areas where standards and guidelines might be extended to further protect nesting and pfas: 1) some effort should be directed toward prevention of non-permitted, nest-site disturbing activities, where appropriate; for example, signage indicating sensitive habitat might be located where there is a high probability of human activity in proximity to a nest, and 2) management activities within a territory should provide for recruitment of future PFAs (including potential nest areas) in anticipation of loss of current PFA habitat; in some cover types it is unlikely that suitable habitat can be maintained indefinitely and advance planning can considerably shorten the time required to replace desired habitat within a moderately sized (e.g., 10,000 acres) parcel of land. | 4C2 |

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| 26 F | Guidelines g-28 and g-29 address a common area of concern - for many species there are gaps in our knowledge of the species' relation to its habitat and of the effects that some management activities have on a species' viability. We support implementation of the adaptive management approach. However these guidelines appear to assume that a landscape assessment process will be able to identify the components and processes important to the goshawk. It is possible, perhaps even likely, that correct identification of important ecosystem components and processes will only be possible through focused studies of goshawk ecology. In addition, an annual cycle of review and revision (g-29) is probably too short to allow an accurate assessment of the effects of modifications. During the time that this management direction applies (~4 years), effort should concentrate on establishing monitoring methods that permit accumulation of the desired knowledge. | 3A3 |
| 26 G | We strongly support the effort to conduct landscape analyses at the 5th to 6th order HUC (or equivalent) ecological scale (10s to 100s of thousands of acres). We have alluded to the importance of planning and executing management actions on the basis of broad temporal and spatial scales. We believe that the 3 elements described in guidelines g-33, status, risk, and opportunity, can provide an effective framework for landscape-based management decisions. Although this management direction applies only for a short time, it can help to identify risks and opportunities that can be considered during the next cycle of forest plan revisions. We believe that this type of analysis has the potential to improve the quality of future management decisions and ensure long-term sustainability. | 3C |

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| 26 | H | Monitoring is an essential component of adaptive management. We believe that there is a need for effective monitoring in association with all types of management activities. Many of the specified monitoring requirements (e.g., snags, down woody material, and habitat connectivity) should be part of a multi-resource inventory and not limited to efforts such as the Utah Goshawk Project. Habitat metrics specified in these monitoring tasks have value for assessment of habitat of many other wildlife species and are invaluable as indicators of the forest's condition. We believe that these tasks should be generalized and incorporated into future forest plans. In addition, there should be species-specific monitoring (such as m-1 and m-2) for sensitive, indicator, and T&E species. However, we believe that project-initiated monitoring has some shortcomings that should be improved upon. For example, if a vegetation management project is proposed there will be a nest site search and 1 or 2 years of monitoring prior to execution of the project. Monitoring requirement m-2 (mitigation measures) states that the acceptable range of results is … Using post-project territory abandonment as a measure of mitigation effectiveness assumes that abandonment is always caused by vegetation management. While it may be true that management activities increase the probability of territory abandonment, the current method of monitoring probably produces confounded and/or biased results. If an active territory is located in association with a project, there are only two outcomes - the territory remains active or it is abandoned. Therefore, as cases accumulate there is a bias toward negative results (even if the abandonments are only by chance.) It appears that there is no mechanism in place to record new occupancies in the vicinity of finished projects. Furthermore, if a nesting pair moves to an alternate nest site that has not been detected, it is counted as an abandonment and further biases the picture. In many cases projects are initiated in response to a forest health crisis … This means that nest site monitoring begins at a time when the goshawk nesting habitat is experiencing rapid degradation. In this scenario, it is likely that abandonment will occur eventually, with our without implementation of this project. A much clearer picture of goshawk territory dynamics can be provided if nest site monitoring is started long before forest health crises or vegetation manipulation projects occur. We suggest that there be a systematic effort to locate and monitor goshawk territories in all Utah forest. Only by having a complete history of territory establishment and abandonment, in addition to multi-resource inventory data, can accurate conclusions be drawn about territory dynamics and their relation to habitat qualities. | 3A3 |

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| 26 I | We believe that prioritization of treatment in high-quality, high-risk goshawk habitat provides the highest level of insurance against habitat loss in the near future. Once again, we caution that strict prescription (I.e., absolute priority given to high or optimum quality habitat) need not necessarily be followed. For example, the first question to be asked is whether or not there is a treatment available that will maintain the area in high-quality habitat. If there is a low probability of success, then another option might be to upgrade nearby stands in where there is higher probability of success. Or, motivation for prioritization might be to "buy time" while other habitat matures to a suitable condition. Such decisions must be site-specific, depending on an assessment of the greater landscape. Again, we believe that flexibility and adaptive management methods are key. | 3C |
| 27 . | I hope that the Forest Service and their environmental assessment can win this one. I am behind them all the way. | 3C |
| 28 . | I do not support the Center for Biological Diversity's hard nose position on the goshawk project. I would urge you not to choose Alternative E. | 3D |
| 29 A | The purpose and need for the proposed action are unclear. The mandate of the NFMA is to manage National Forests for multiple use, sustained yield of the multitude of natural resources found on the lands. The trend of land and resource management is leading to broad, ecosystem-based goals and objectives. The development of management direction focused on a particular species fly in the face of systems-based management. If the National Forests are managed properly and effectively, there should be no need for management direction focused on the northern goshawk or any other single species. It appears that the Forest Service is giving the goshawk similar status to a threatened or endangered species. All evidence points to the fact that the population and habitat of northern goshawk in Utah are viable and stable. The entire exercise may be without merit. | 2A1 |
| 29 B | The EA at 4.4.1 (pg. 4-49) states that "The preponderance of minority and low income groups live in the urban environment of northern Utah." This statement is simply not true. Consider the American Indian populations in the Uintah Basin, the Navajos in San Juan County and the Southern Paiutes in southwestern Utah. In addition, most of the small communities adjacent to National Forests in Utah are classified as low or moderate income communities by the Utah State division of Community Development, based on HUD standards. The "localized effects" on low income and minority populations are measurable. We ask that the Environmental Justice section be revised to portray an accurate description of the issue. | 1F1 |
| 29 C | We feel that the forest planning process will adequately address northern goshawk habitat needs. The scarce planning and management funds available to the Forest Service should be allocated for forest-wide planning rather than a single-species focus. | 2A1 |

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| 29 D | On page 4-54 the Grazing Effects Summary states that "Though some localized effects to grazing permits, including reductions in AUMs, may occur they are not expected to be measurable at the forest or state scale." This may be well and good for the bureaucrat at the forest or state level, but a severe and lasting impact to the permit holder. These permit holders deserve more consideration and attention in the analysis. | 1F |
| 29 E | The Draft FONSI identifies Alternative F as the selected programmatic direction while the EA identifies Alternative B as the proposed action. The FONSI does not describe the process by which the proposed action was changed. This is a serious flaw which should be rectified before finalizing the FONSI. | 2B4 |
| 30 . | I am writing to support the wisdom and research of the Forest Service that lawful multiple use does not threaten the goshawk habitat in our Utah National Forests. Furthermore, I would support Alternative F as the preferred temporary action to address this "Finding of Non-Significance." | 3D |
| 31 A | We disagree with 2 fundamental assumptions of the Utah Northern Goshawk EA. Primarily that the "current goshawk population is viable in the state of Utah" and secondarily that silvicultural (mechanical) treatments in goshawk habitat are beneficial to the species. Both of these assumptions are the subject of considerable scientific debate and can be considered uncertain at best. | 1C1, 1D4 |
| 31 A | A conservation biology alternative should be developed that fully protects large "reserves" of goshawk nesting and foraging habitat as well as movement corridors connecting those reserves. This is the only way goshawk will truly be protected in Utah. | 2A5 |
| 31 B | There are several glaring flaws with the Utah Northern Goshawk EA. Its greatest flaw is that it is based on selective science. In particular, the EA rests largely on Reynolds et al and Graham et al. Both of these documents are USDA Forest Service research documents and are based on flawed assumptions and questionable methodologies. Further, a non-biologist forester primarily authors Graham et al. Thus the work of a trained forester is driving decisions concerning the fate of an imperiled species that occurs primarily on Forest Service lands in direct contradiction to the recommendations of several renowned and experienced biologists from both the Forest Service and Arizona Game and Fish. The Utah Northern Goshawk EA has, generally, ignored any science outside of the agency that contradicts the a priori conclusion that forests must be logged to support goshawk | 1D2 |
| 31 C | The Utah Assessment falls short of being a credible scientific assessment. Goshawk habitat conditions "on-the-ground" are not credible verified nor are the conditions consistent with definitions in the scientific literature. The Utah Assessment analysis of connectivity is also flawed because it accounts only for distance between forest patches it fails to incorporate any measure of movement corridors nor the quality of those corridors. he connectivity analysis assumes that goshawks will travel up to 60 miles through any habitat type regardless of its condition. | 1C2 |

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| 31 D | The finding that the current goshawk population is viable in Utah is based on several factors, one of which is that there is an "absence of evidence of a population decline on Forest Service lands since 1991". Simply because the Forest Service did not sufficiently "look" for this evidence does not mean that there is not a declining population. Further, the statement is inaccurate. | 1C1 |
| 31 E | ... Smith and Hoffman (1997) found that the fall passage rate of immature northern goshawks through the Wellsville Mountains in northern Utah declined by about 40% between the late 1970s and late 1980s. Although the evidence does not directly show declines in Utah populations it does weaken any assertion that populations are not declining on Forest Service lands. Research in both New Mexico and Arizona has demonstrated reduced occupancy, density, and reproduction rates of northern goshawk (Crocker-Bedford 1987, Crocker-Bedford & Chaney 1988, Crocker-Bedford 1990 and Williams 1997). Taylor (1998) states that "[unbiased analysis of nest territory records suggest that goshawk populations have declined sharply in the south and central west since 1992 despite the introduction of present management guidelines for the Forest Service." | 1C1 |
| 31 F | The Utah Assessment contains contradictions that undermine its usefulness. The most obvious contradiction is the assertion in several places that goshawks continue to successfully utilize beetle killed forests (pgs 2 & 9) and then on pg. 29 there is the statement insinuating that Englemann spruce killed by bark beetles create "conditions [that] are of low value for both goshawk nesting and foraging." | 4C1a |
| 31 G | Another glaring contradiction [Utah Assessment] concerns the nesting and foraging conditions preferred by goshawk. On page ii of the Utah Assessment it is stated that "dense stands with many canopy layers … make them undesirable for both nesting and foraging by goshawks" and then on page 3 the assessment claims that multiple canopies are "important internal components" of nest sites. Other wildlife agencies have made it clear that goshawks hunt most efficiently in relatively mature, dense forest structures (AGFD 1993). | 1A1 |
| 31 H | The Management Recommendations for the Northern Goshawk (Reynolds) which has been adopted by R3 fails to assess the test of scientific rigor and is unsubstantiated as a method for maintaining goshawk viability. Unfortunately the Northern Goshawk EA appears to emulate the MRNG closely and thus will not secure the viability of the northern goshawk. One of the most deficiencies in the EA is its reliance upon single territories, PFAs and/or nest areas instead of large clusters of suitable habitat that can support multiple goshawk pairs over time. A single territory approach violates one of the most important reserve design criteria widely accepted by the scientific community-namely, that reserves should be large and capable of supporting multiple breeding pairs. | 1D5 |

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| 31 I | The direction outlined in the EA will fail to secure the goshawk viability because logging will continue in goshawk territories, post fledgling family areas, and nest stands in direct contradiction of studies that indicate extreme goshawk sensitivity to timber harvest. Not only does the EA encourage logging in goshawk territories but it allows for habitat conditions to be modified beyond what the best scientific literature has determined tolerable by the species. The EA should have analyzed a conservation biology alternative in which large goshawk reserves are set aside and not open to resource extraction activities, in particular logging. | 2A5 |
| 31 J | The northern goshawk is dependent upon mature, closed canopy forests and finds ideal habitat within closed canopy and structurally diverse stands. In contradiction with findings of the MRNG [Reynolds], northern goshawks "have evolved physical characteristics (morphology) that enable them to hunt most efficiently in relatively mature, dense forest structures" (AGFD). The open forest conditions that are discussed in the EA are likely to create forest structural characteristics which will not enable goshawks to use their morphological adaptations most efficiently. | 1B1 |
| 31 K | The preferred alternative would favor canopy closure far below the 60%+ level preferred by the goshawk including many acres of small patch clearcuts up to 2 acres with no direction for aspen which can be the goshawk's preferred nesting habitat. Further, the EA merely prescribes interlocking crowns in many instances which in most cases does not guarantee sufficient canopy closure. Maintaining low canopy densities will give advantage to the goshawk's chief competitors which include the red tailed hawk and great horned owl. Scientific evidence of the effects of logging on goshawks has documented that these species tend to out compete and take over goshawk testing areas once the forest canopy has been opened [quote from AGFD]. | 1A1, 1A2 |
| 31 L | Other indirect effects [from canopy closure below 60%] will include reductions in prey base especially those prey dependent upon dense clumps of forest. Mycorrhizal fungi communities which are the most important food source for the goshawk's small mammal prey will be adversely impacted by open forest conditions. Mycorrhizal fungi spreads only in stands with high canopy closure most often above 60% (Reynolds). | 4C3 |
| 31 M | Managing for open forest conditions also fails to account for changes in the prey base cased by the change of seasons. In winter many of the goshawk prey species migrate or hibernate leaving available only a limited number of prey species which are dependent upon dense forests. During the winter, dense patches of mature forest are essential for maintaining populations of the blue grouse, cottontail rabbit, hairy woodpecker, northern flicker, red squirrel, Stellar's jay and Willliamson's sapsucker. | 1A2 |
| 31 N | Indirect effects on goshawk viability from management for open forest conditions are described in a comprehensive review of goshawk management completed by the Arizona Game and Fish Department (1993). | 3C |

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| 31 O | Logging is directly detrimental to the goshawk even if such logging involves only light touch thinning. Rest of comment is quote from Crocker Bedford 1990. | 1D4 |
| 31 P | Forest structure guidelines that are intended to maintain or restore mature and old growth conditions on a percentage of the landscape have failed miserably in R3 and should be dropped for more rigorous and specific standards limiting the cutting of large trees and logging in old growth. Our experience in R3 has been that despite these general standards for maintaining a percentage of VSS 4,5,6, old growth trees have been logged and old growth conditions continue to deteriorate in the Region. | 1D6 |
| 31 Q | The EA seems to advocate mechanical treatment, logging, as a means of maintaining or restoring northern goshawk habit when the emphasis should be restoration through the reintroduction and maintenance of natural disturbance. The emphasis on early seral forest conditions is a transparent invitation for logging. This type of direction can easily be achieved through non-commercial restoration projects and especially the reintroduction of natural disturbance such as fire combined with reductions in and/or full removal of grazing habitat. There is very little mention in the EA of natural disturbance or fire as an appropriate and preferred management tool although Graham et al. repeatedly mention the continued successful nesting of goshawk in naturally disturbed forests. | 3B |
| 31 R | Logging is apparently the reason that the northern goshawk is in the dire situation that it is; thus addressing the species' viability through logging is not the answer. | 3B1 |
| 31 S | In regards to snag and down log densities, the EA prescribes densities much too low to realistically provide adequate habitat for goshawk prey species. This issue should not have been dropped from consideration in the EA; the "limited information" excuse is not tenable. Sufficient survey data exist from both the Rocky Mountains and other geographically diverse regions to make scientifically justifiable conclusions about snag and down wood densities in Utah's coniferous forest. | 1B2 |
| 31 T | Most surveys in unlogged forests indicate snags and down log densities are higher than 2-3 per acre. Bull (1997) found natural or recommended snag numbers (>10" DBH) per acre in ponderosa pine forests to be 4.8 and in mixed conifer to be as many as 48. Obviously 2 and 3 snags per acre are far below the number that occurring natural unlogged forests. The same is true for the minimum recommended number of down logs, 3-5 per acre is just too low a value and will need to be increased if the northern goshawk and its prey species are to occur in viable populations. Snags and down log decay rapidly with time and leaving only 2-3 snags per acre and 3-5 down logs per acre does not account for decay. | 1B2 |

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| 31 U | The EA continues to be vague in regards to roads and their effect upon the northern goshawk and its prey species as well as off road vehicle use. Managing road densities "needed to meet resource objectives while minimizing disturbance to goshawk territories" is vague and provides no concrete direction as to road densities in goshawk habitat nor the need to close and obliterate road networks. Goshawks are disturbed by the presence of humans and their vehicles, roads provide that access, thus it is clear building roads for timber harvest and leaving existing roads open will not contribute to the goshawk's long-term viability. The final EA will need to address road building and road densities in goshawk habitat with concrete standards and guidelines. | 4C4 |
| 31 V | Social and economic factors are not treated realistically in the EA. Federal timber in Utah contributes very little volume to regional markets. There is just over 5 M acres of forestland under Forest Service administration in Utah representing just 32% of the forestland in the state available for timber harvest. Further, the Forest Service cannot even sell trees from lands under its management. In 1998 R4 sold just 29% of the timber sale volume offered in the competitive bidding process. 71% of the volume received no bids. With so much timber on the market, the Forest Service is having a hard time selling wood everywhere in the US. Even a minor decline in volume offered in Utah would be offset by a staggering timber backlog. | 1F |
| 31 W | Despite a 50% reduction in timber cut on national forest lands in Utah between 1988 and 1996 employment in the wood products industry rose nearly 22% (Bureau of Labor Statistics 1998). Finally jobs in the wood products industry amounted to just .6^ of all statewide employment in 1996. In light of this information it is irresponsible for the EA to characterize any measures protecting the northern goshawk in Utah as having even a measurable effect on the state's timber industry or economy. Further there may be gains in the non-timber related sector from implementing strong goshawk standards and guidelines. | 1F |
| 31 X | The goshawk team should be commended for giving serious thought to many critical issues brought up in scoping. The team has come up with standards and guidelines which are steps in he right direction but will require strengthening. | 3A1 |
| 31 Y | Unfortunately most of the guidelines are just, unenforceable guidelines that will be followed infrequently by Forest Service land managers. | 3A1 |
| 31 Z | The goshawk team has assigned these guidelines to the alternatives in such an illogical manner that no one alternative can be fully supported. It is our recommendation to the Goshawk team that the alternatives be rearranged so that one alternative represents the strongest possible protection for goshawk (e.g. grazing restrictions, road and skid trail restrictions, old growth restrictions, restrictions on openings and basal area reduction, cutting large trees, etc.) and other alternatives represent lesser degrees of protection. Most likely alternative E is the place to start. | 2A3 |
| 32 A | There is Federal "Payment-in-lieu-of-Taxes" shelter available to communities who apply - it is worthwhile to make this availability-alternative known | 4C5 |

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| 32 B | This [article entitled let's stop cutting trees to fund schools"] appeared in the winter 99-00 edition of the quarterly newsletter of The Wilderness Society. The mater is worthy and cogent of immediate action. Layer the protection of HR 2868on top of "Alternative E" and the preservation of habitat for northern goshawk and other, is yet even more comprehensive. **article enclosed. | 4C5 |
| 33 . | … supports alternative F … As a result of 8 years of research and monitoring we have found that the northern goshawk is highly adaptive and utilizes a wide variety of habitat. Based on this monitoring site specific BMPs and mitigation measures for the northern goshawk have been developed and adopted by the USFS and ... To date these adopted measures have demonstrated positive effects t the northern goshawk populations and their habitat within the Independence and Bull Run Mountains.˝ **rest of comment letter was information on collaborative efforts between Boise State and Forest Service in northeastern Nevada. | 3D |
| 34 A | We support pro-active vegetative management habitat programs that maintain favorable habitats for goshawks and their prey. | 3C |
| 34 B | The Habitat Conservation Strategy (HCS) which includes the Agreement for the Management of the Northern Goshawk Habitat in Utah also states "Based on the findings in Graham et al. (1998) that good quality habitat is well distributed and connected throughout the state of Utah, the absence of evidence of a population decline on National Forest System lands since 1991, and consistent with findings by the FWS, we believe the current goshawk population is viable in the State of Utah." In our view this is good news. | 3C |
| 34 C | The HCS also affirms that on National Forest lands, 20% of the high value habitat is in a timber management emphasis, 35% is in mixed uses and 27% is in a range management emphasis. The Assessment does not reveal any substantial deficiencies in the habitat quality in any management category. The authors say that this could be a result of: 1. Management activities are having no negative effect on goshawk habitat, 2. Scale of the Assessment is unable to detect effects on goshawk habitat. We feel that a third factor is a very real possibility. Ongoing management activities are actually enhancing goshawk and prey habitat conditions. The Assessment, interestingly, also states "Perhaps one of the greatest impacts on habitat loss is the lack of fire in the ecosystem." The project team and authors elaborate at length on the adverse successional changes to habitat that this is causing. | 3C |
| 34 D | Is there a problem? Data and information contained in the HCS and in the Assessment do no indicate problem of goshawk viability. …. As you can see the goshawk situation is somewhat confusing when compared with the draft Utah Northern Goshawk Environmental Assessment (UNGEA). There appears to be a disconnection between the science of the Assessment, the direction of the HCS and the alternatives displayed in the draft UNGEA. The science of the Assessment does not match up with the alternatives displayed in the UNGEA and the purpose and need statement under 1.3. The Forest Service should consider staying with alternative "A", the no action alternative and direct each Forest to carefully carry out their management processes until forest plans are revised. | 3D |

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| 34 E | The majority of the suggested standards and guidelines in the alternatives restrict vegetative management activities and will not attain HRV condition levels. This will degrade habitat capability for the goshawk. This will in turn impact many forest users who are the backbone of our rural area's economy. | 1D3 |
| 34 F | The only reason not to select Alternative "A", is the reduced potential for getting fire back into the ecosystem and to aggressively use other management actions to simulate a full range of HRV disturbance levels. In that respect, we see some utility for Alternative "F", in the final UNGEA, provided that it is modified by adding the following guidelines: g-1 which recognizes and provides for HRV including extreme events. g-6 which recognizes and provides for ecological scale vegetative structure. g-13 which offers less restrictive canopy closure parameters that defaults to HRV. | 2A5 |
| 34 G | We also urge the elimination of the following standards and guides from the final Alternative "F"; g-4 that is unnecessary and at times penalizes ecosystem function. G-15 HRV must be the determinant and not a guide that penalizes the broad scale goals of goshawk and its prey habitat management requirements. s-9 unnecessarily inhibits needed treatments, including prescribed fire. Seven months protection is unreasonable and even exceeds the needs of the fledglings. S-11 why does this apply to alternative "F" only? Please eliminate. | 2A5 |
| 34 H | The Forest Service should provide more detail for assuring consistency between Assessment, HCS, and the UNGEA. Available goshawk information and science does not support imposing more restrictive management emphasis. | 2A2 |
| 34 I | We favor the selection of either Alternative A or our suggested Alternative F with modifications - eliminate g-4, s-9, s-11. | 2A5 |
| 34 J | We urge the Forest Service to make inclusive decisions that benefit both the ecosystems of our forests and the sustainability of nearby rural communities. | 1F2 |
| 35 A | The body of the report <EA> provides information that substantiates my position that the northern goshawk should not be put on the threatened, protected, or endangered species list. There seems to be ample evidence that the goshawk is found throughout the area which supports the rationale that continuity of habitat is not a problem that has to be provided for. | 2A1 |
| 35 B | Under strict compliance with the proposed action many resource activities could be impacted. To name a few would be road maintenance, domestic livestock grazing and management practices, mineral exploration and/or development, timber harvest and management practices and others. The habitat of the goshawk and its prey would be and could be protected by allowing some use and development and still be in compliance with the continuity standards. | 1F2 |
| 35 C | Management activities designed to perpetuate the Aspen type should be encouraged. Generally in our area the Aspen is encroached upon by conifer species which over time reduces their value as a viable habitat for many of the prey species. | 3C, 1E |

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| 35 | D | In my opinion, there are sufficient management rules, policies and regulations already in place to protect and preserve the nesting, foraging, and connectivity needed by the goshawk. Use and management of the resources could and should be allowed and accommodated within these guidelines. | 2A1 |
| 35 | E | If alternative F is selected and implemented, I assume that when the forest plans are updated and redone in approximately four years, there will be opportunity to evaluate how effective this implementation has been and if there is need to carry it over into the new forest plan. | 3A3 |
| 36 | A | The body of the report <EA> provides information that substantiates my position that the northern goshawk should not be put on the threatened, protected, or endangered species list. There seems to be ample evidence that the goshawk is found throughout the area which supports the rationale that continuity of habitat is not a problem that has to be provided for. | 2A1 |
| 36 | B | Under strict compliance with the proposed action many resource activities could be impacted. To name a few would be road maintenance, domestic livestock grazing and management practices, mineral exploration and/or development, timber harvest and management practices and others. The habitat of the goshawk and its prey would be and could be protected by allowing some use and development and still be in compliance with the continuity standards. | 1F2 |
| 36 | C | Management activities designed to perpetuate the Aspen type should be encouraged. Generally in our area the Aspen is encroached upon by conifer species which over time reduces their value as a viable habitat for many of the prey species. | 3C, 1E |
| 36 | D | In my opinion, there are sufficient management rules, policies and regulations already in place to protect and preserve the nesting, foraging, and connectivity needed by the goshawk. Use and management of the resources could and should be allowed and accommodated within these guidelines. | 2A1 |
| 36 | E | If alternative F is selected and implemented, I assume that when the forest plans are updated and redone in approximately four years, there will be opportunity to evaluate how effective this implementation has been and if there is need to carry it over into the new forest plan. | 3A3 |
| 37 | A | Bridgerland Audubon Society, having reviewed the Utah Northern Goshawk Project and the comments of some of our colleagues, wishes to go on record as supporting the analysis and conclusions of the Center for Biological Diversity, In Tucson, AZ. | 3C |
| 37 | B | We agree that there are serious inconsistencies between the scientific data regarding minimum canopy cover and the EA's proposed standards, which are much lower. | 1A1 |

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| 37 C | We concur that Alternative E is closest to being acceptable and especially agree with their insistence that amendments be made: 1) to retract any and all livestock grazing and logging near any active or alternate nest site, and 2) to monitor for goshawk nests be done for at least two years prior to permitting any potentially disturbing activities. | 3D |
| 37 D | We're disappointed that in the nearly 9 years since the Forest Service decided the goshawk was a sensitive species, there has been so little quantitative data on their population in Utah. It is impossible to make informed decisions on policy, not just specific projects, without a much better idea of distributions and health of the goshawk. | 2A2 |
| 37 E | We fear that the concept of "historical range of variation" is far too nebulous and indiscernible to be used as a management tool. We have found that research on past forest patterns in our own part of the forest is insufficient in data and relies too heavily on assumptions, which can prove very dangerous when extrapolated to an entire forest. | 1D3, 1D4 |
| 38 . | I urge that all Utah Northern Goshawk habitat be fully and permanently preserved, and managed as sanctuary areas. And to administer the National Forest System in Utah as wildlife, fish & plant habitat Sanctuary preserves. To fully preserve all roadless areas; and to designate all roadless areas as wilderness. To comply with all provisions of the Endangered Species Act. And to establish the National Forest System areas in Utah as preserves, along with the designation of the National Forest System in Utah Wilderness of (at least) 8,391,000 acres. | 2A5 |
| 39 A | The EA preferred alternative relies heavily on vegetation manipulation (logging) as a way to protect and preserve the northern goshawk. It assumes human manipulation can better preserve (or is even necessary to preserve) the species than natural processes. Please explain and present the scientific basis for that assumption in the decision notice. Cite all scientific publications that support the preferred alternative and state what specific parts of those publications support the preferred alternative. If the Forest Service relies on scientists' "professional opinions" to support the preferred alternative, please state who those scientists are, the documents they relied on to arrive at their opinions, and present any documents where they have gone on the record stating their professional opinions. | 3B |
| 39 B | Please also present a discussion of what if any influence the possible listing of the northern goshawk pursuant to the Endangered Species Act has had on the EA. Present a discussion and documents of all communications the Forest Service and the Utah Division of Wildlife Resources of any other person or entity with biological expertise in preparing the EA relative to techniques, processes, and means for avoiding listing. | 4C1c |

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| 39 C | Please discuss the biological basis for your conclusion that the northern goshawk is a habitat generalist. Cite all scientific reports that support this conclusion. State what specific part of those reports supports the Forest Service's conclusion the goshawk is a habitat generalist. If you rely on the "professional opinion" of Forest Service's biologists, or any other biologists, to support this conclusion, cite all reports and analyses they relied to support their conclusion. Name any biologists the Forest Service relies on in this regard and present any documents where they have gone on the record stating the goshawk is a habitat generalist. | 4C1d |
| 39 D | Also state why the conclusions in this EA relative to the biological needs of the northern goshawk differ so much from the conclusions in the Southwest Region of the Forest service relative to goshawk management. State any contrary views and publications in these regards and state why those views were not adopted. | 1D6 |
| 39 E | State how the EA comports with and complies with the new and developing Forest Service roadless area policy announced by President Clinton last fall. | 2B5 |
| 39 F | I support an Alternative allowing roadless areas to remain undisturbed by roads, timber harvest, livestock, grazing, fire suppression and vegetation treatments as the only viable course of action to preserve the northern goshawk. Alternative B is totally inadequate in that regard. | 3D |
| 39 G | I also request that an EIS be prepared on this matter. The scope and intensity of this plan make it clear that this is a major federal action significantly affecting the human environment. Yet the EA fails to address the scope and intensity of the project. Please do so in detail in the decision notice and state why an EIS is not required, if you so conclude. | 2B1 |
| 40 A | … supports the Forest Service's Proposed Act of the EA's alternative B. … agrees with the EA findings that consistency in future goshawk project design, implementation and monitoring across al Utah forests is necessary to assure viable goshawk populations. ... Alt. provides the soundest management plan to continue these populations. We rely on the Forest Service to implement scientifically sound and uniform management plans at the individual forest level--consistent throughout the state--to preclude any listing of the goshawk on federal endangered species registers. Alt. B will allow this course to most likely be achieved. | 3D, 2B4 |
| 40 B | We support the finding of No significant Impact thereby eliminating the need for an EIS on this project and support the NFMA finding of nonsignificance. Support the project through Alternative B proceeding to the forest level to implement proper forest plan revisions concerning the project. | 2B1 |
| 40 C | … are wholly opposed to Alternative E. .. Better and more acceptable solutions can and must be both found and achieved not only in this project but on all issues concerning our National Forests. | 3D |

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| 41 A | Our greatest concern with the implementation of any new management plan relates to the economic and social impacts to the affected areas. We applaud those who prepared the Assessment for considering these factors and it appears the preferred alternative has little or no immediate impacts on these important human issues. We urge those who implement this plan to keep these issues in mind not only in the short term but into the extended future as well. The more restrictive management options outlined in other alternatives could have immediate, adverse impacts on the region's economy and we would oppose any efforts to substitute these alternative for preferred alternative. | 1F |
| 41 B | One area which remains troublesome is habitat management in proposed roadless areas. While the EA maintains the management plan can be accomplished in these areas, we see this as being very difficult and highly impractical in the real world. If the goal is to manage forest areas for the goshawk, access for men and equipment is key to maintaining all the components of the desired forest composition. We encourage the team to address the issue of habitat management with those in the National Forest who are dealing with roadless areas and to reduce such roadless areas where appropriate. | 2B5 |
| 42 A | We are opposed to any cuts in the grazing AUMs on the Oak Creek Allotment. We continue to endorse a multiple use concept in managing Forest Service lands but feel that if cuts in the use needs to be made to preserve habitat for threatened species that those cuts need to be fair and equitable for al involved. We feel that grazing has already taken a large cut as far as use in the Main Canyon of Oak Creek is concerned and respectfully request that you make a decision that leaves the grazing AUMs as they now are. | 1F |
| 42 B | Turkeys, which are a non-native species to this area, were introduced in the Oak Creek Mountain Range. These turkeys have done very well and now number in the hundreds. … The turkey proclamation for 2000 lists a total of 5 resident permits for turkeys to be taken in Oak Creek. It would seem to us that these turkeys are competing with the goshawk for much of same food supply and to allow these turkey numbers to continue to row would jeopardize the goshawk even further. If something must be done, please consider changes in the turkey harvest numbers. | 4C1 |
| 42 C | The Main Canyon in Oak Creek is seeing more and more recreation use each year. Several years ago some roads were closed to motor vehicle travel but many of these roads continue to be used by 4-wheelers. We urge a higher level of enforcement to curtail illegal activities. It seems that camping is occurring in undeveloped campgrounds especially in the Plantation Flat area where the goshawk is living. This would appear to us to directly impact the habitat of the goshawk. We advocate limiting recreational use in these areas. | 4C4 |
| 43 A | … encourages the Forest Service to create better quality forests by removing the late seral species to encourage younger forest growth which in turn will create and improve the existing watershed on the National Forest. | 1B3 |

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| 43 B | We believe that all new plans should be carefully evaluated to reflect the goals that are stated in these new recommendations. | 2B5 |
| 44 A | As first I was distressed that this was a temporary measure because it is an interim decision. I was somewhat relieved to read that when forest plans for the affected national forests are revised the management direction adopted through this amendment will be integrated as needed to best meet the intent of the conservation strategy and assessment. Consistency in habitat management is an essential component for the future of the goshawk in Utah. For all the sensitive listed, future forest Plans must provide for sustained old growth forest habitat. | 3A2 |
| 44 B | This is my concern, that what Alt. F begins the Forest Plans for the 6 National Forests will continue. There are too many exceptions to the whole Management Plan which destroys the consistency. These exceptions infringe on the remaining old growth forest making it more fragmented and less viable. Ski resorts have already developed Master Plans to expand into more NF. Other recreational activities, such as snowmobiling, off-road vehicles, mountain biking continue to expand, and these activities are difficult to manage. From my perspective, mineral leases because of archaic mining laws have no restrictions. Oil and gas leases continue to encroach. Even though there have been some restrictions on timber and grazing allotments in my opinion they still have first priority. The Forest Service provides great scientific research and then cites all of the exceptions that can't be changed. | 3A1 |
| 44 C | I feel more safeguards and restrictions are needed to protect our NFs so there will still be wilderness habitats intact representing all the plant and animal species existing on Earth in the future. | 3C |
| 45 A | As usual you people in the Forest Service are joined at the hip with the timber and livestock industry. Inasmuch as your Chief, Mike Dombeck, has issued directives to be more environmentally friendly, I.e. to preserve roadless and create wilderness areas being he most recent, some just haven't gotten the message. This is a case in point. | 3B1 |
| 45 B | The EA doesn't properly address livestock impacts that deplete forage for the goshawk prey base which will result in further fragmentation of mature forests and decline of sensitive and other species. But this is what the livestock interests want so you'll be obedient servants. | 1E2 |
| 45 C | If any of the alternatives in this EA is accepted the Forest Service will have an unlimited ability to accelerate timber harvest under the guise of forest health or protecting goshawk. | 3B1 |
| 45 D | This issue requires a full EIS to include all aspects of ecosystem protection for the goshawk and other TES. | 2B1 |

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| 46 A | It is obvious that the grazing emphasis needs to be reevaluated. Changing the utilization standard for forage and shrubs in Alternative D does not go far enough. Grazing needs to be eliminated from the majority of FS lands to restore the degraded habitats and protect the native process for future of the goshawk and other native species. Your own EA states that current planning directions must be modified sufficiently (i.e. eliminate grazing). | 1E2 |
| 46 B | In conjunction [with no grazing] the FS must not allow DWR to continue and dominate the management of elk herds. The inflated populations of elk are also destroying the understory and disrupting aspen rejuvenation when in turn discourages diverse understory habitat. This issue isn't even addressed. The NFMA gives you the power to act in the best interest of the goshawk and ecosystem health. A quote from 36 CFR 219.19 follows. | 1E2 |
| 46 C | None of the alternatives presented is acceptable. Instead an Environmental Impact Statement (EIS) must be prepared that includes analysis of all science and places priority on Northern Goshawk habitat requirements. | 2B1 |
| 46 D | I fully support the science and analysis presented in the comments submitted by the SW Center for Biological Diversity. | 3C |
| 47 A | We support those aspects of the proposal representing an increase in protection for this troubled species. However, some of the proposed direction would almost certainly have adverse impacts to goshawks. Other portions of the proposed direction are at best scientifically indefensible. Thus we do have serious concerns about certain aspects of the proposed management direction and the related documents. | 3C |
| 47 A | … the R4 management recommendations do prescribe alteration of vegetation conditions in R4. Although they are characterized as such, these recommendations are not designed from the outset to maximally benefit goshawks. Instead the recommendations are designed to allow for timber harvesting and other habitat alterations in ways which would still harm goshawks only less so than under current direction. Moreover some elements of the proposed R4 management direction set forth desired future conditions for goshawk foraging habitat ... which will actually require extensive timber harvesting to achieve. Thus implicit in the recommendations is an intention to alter goshawk habitat ... for these reasons significant impacts will occur as a result of implementation. The cursory EA the agency has produced is insufficient and inappropriate for analyzing and disclosing these impacts. An EIS must be prepared to comply with NEPA. We also point out that an EIS was prepared ... for R3. Why then does R4 believe it can get away with an EA when proposing to adopt essentially the same kind of direction for the Intermountain Forests? | 2B1 |

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| 47 B | It appears the proposed management direction for goshawks in Region 4 was based on the management guidelines developed for goshawks in Region 3. While some of the R3 guidelines - such as protection of nest trees as well as replacement and alternative nest stands - are reasonable and necessary we see several problems with relying on other R3 goshawk management guidelines in R4. | 1D6 |
| 47 B | … the proposed management direction would compel land managers to implement vegetative treatments to alter forest structural stages purportedly to increase goshawk prey abundance. This will have significant environmental effects; it also represents a significant departure from taking no action and from the management direction set forth in the existing forest plans. For this reason, any such management direction, to the extent that it calls for altering forest vegetation will require a significant amendment to those forest plans. The draft finding of non-significant amendment failed to consider the widespread habitat alteration prescribed by the proposed management direction. | 2B1 |
| 47 C | The R3 goshawk management guidelines are untested and have been criticized as being to weak to adequately protect northern goshawks and their habitat in the southwestern US. This was admitted in the USFWS's recent 12-month status review on the goshawk. In particular some scientists have justifiably criticized the R3 direction calling for creating younger successional stages in post-fledging family areas (PFAs) and goshawk foraging habitat. Also the untested R3 guidelines may not work and may allow for the extirpation of the northern goshawk in the southwest. ... R4 should not adopt such a risky unproven and criticized course of action. | 1D6 |
| 47 D | NEPA requires that uncertainties be disclosed and addressed [re using R3 guidelines] , see 40 CFR 1502.22(b) and 1502.9(b). If R4 intends to use the R3 guidelines then R4 has an obligation to acknowledge and address the criticisms voiced against the R3 guidelines. | 1D6 |
| 47 E | ... it is inappropriate to use the R3 goshawk management guidelines is that those guidelines were based largely on the assumption that prey availability was limiting to goshawk populations; the R3 guidelines therefore direct land managers o create a mosaic of varying structural stages to improve goshawk prey availability. Even if this were a valid assumption in R3 -- and it probably is not -- there is no basis for simply assuming the same is true in the more northerly forests of R4. The EA does not analyze the extent to which habitat quality or prey abundance (or other factors) limit goshawk populations in the analysis area. Therefore it would be wrong to summarily adopt guidelines similar to those adopted for R3. | 1D1, 1D6 |

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| 47 F | Because climactic conditions are harsher in R4 than in R3, goshawks undoubtedly have different habitat requirements in the 2 regions. In particular, because the forested areas of Utah are typically much colder and windier than much of the forested habitat in R3, it is reasonable to conclude that goshawks in Utah need more extensive thermal protection than goshawks in R3. This implies nesting, PFA and foraging habitat in R4 should contain more mature closed-canopy component than in R3. Similarly there may be more goshawk predators and competitor species in R4 than in R3. This too implies there should be greater forest cover provided in R4 than in R3 to conserve the goshawk. Nevertheless, the proposed R4 management direction for goshawks is taken directly from R3 and the EA contains no analysis or discussion on possible goshawk habitat requirements specific to the more hostile Intermountain Region forests. | 1D6 |
| 47 G | Has R4 done any monitoring of goshawks in Utah to determine what habitat conditions are needed by goshawks in this part of the country? The NFMA regulations require such monitoring but we doubt any meaningful study has been done. The way to deal with this uncertainty is not to simply adopt another Region's unproven and inapplicable guidelines but to begin comprehensive monitoring to learn more about the species' needs and vulnerabilities in R4. This is not adequately addressed in the draft EA or proposed FONSI. | 3A3 |
| 47 H | The EA also fails to explain the evidence or scientific reasoning which led he agency to depart from the R3 guidelines for some goshawk habitat needs. Why, for example, does the agency believe goshawks - which exhibit strong nest fidelity - will be conserved by allowing vegetation treatments in nest stands while nests are inactive? See s9. If the nest can be logged after the goshawks leave their nest for the year the habitat would still be eliminated leaving them without a nest stand when they return the following year. What scientific studies show such management direction is reasonable or defensible? The R3 guidelines certainly do not allow for alteration of nest stands, active or inactive. The agency cannot rely on unsupported measures for the goshawk that is most convenient or politically expedient; the agency must develop and adopt sound protection measures based on the needs of the species in R4. The proposed R4 management direction does not accomplish this. | 1D5 |
| 47 I | Another significant flaw in the proposed R4 management direction is that it would only apply to NFs in Utah. The needs of goshawks in all the R4 forests in Nevada, southern Idaho, and western Wyoming are being completely ignored as far as we can tell. It is inexcusable for the USFS to impose an arbitrary geographic boundary for managing northern goshawks - a species which does not recognize geographic boundaries. The Intermountain Regional Office should ensure its goshawk management direction - once made scientifically credible for conditions in R4 - applies to all potential goshawk habitat in the Region. | 2B2 |

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| 47 J | It is fair to say that in comparison to the existing Forest Plans the proposed action would increase the minimum requirements for managing goshawk habitat on NFs in Utah. This is a step in the right direction and we applaud the USFS for taking this step. However it has been our experience that when minimum management requirements are established they are invariably used as the maximums or ceilings by managers; in other words, if 30 A is the minimum amount of habitat that must be left around a nest, at most only 30A will be left by USFS decisionmakers (frequently even these minimums are not met unless citizen oversight is intense); and all too often the remnant trees will be left only on steep slopes, in riparian areas, and in other places where logging cannot be done - places which may not be suitable for use by goshawks or other old growth associated species. | 3A1 |
| 47 K | While decisionmakers have discretion to provide greater protection than the bare minimum this is also true under the existing Forest Plans. Thus if decisionmakers were willing to provide adequate protection for goshawks they could do so right now without any Forest Plan amendment. Example given. Since USFS decisionmakers are not providing meaningful protection for goshawks we must conclude they will also fail to provide more than the bare minimum regardless of what habitat requirements are adopted. This is one reason we believe the proposed goshawk management direction are not strong enough to adequately conserve goshawks in Utah. | 3A1 |
| 47 L | Another major concern we have about the proposed R4 management direction relates to the fact that nearly all of the direction is discretionary and unenforceable. Key habitat elements are, under most alternatives, not actually protect, but are listed as goals, objectives, or guidelines all of which are voluntary. In fact, every substantive provision in the proposed management direction is written in a way that allows the provision to be waived or ignored. Example - g-19 & g-20. | 3A1 |
| 47 M | EA at A-7 - should does not mean the same thing as must. Should the decisionmaker decide not to implement these discretionary measures, citizens and scientists will have no ability to challenge the decision in order to gain a necessary level of habitat protection. And, experience has shown time and again that where USFS decisionmakers are not required to set aside habitat they generally do not set aside habitat for protection. Accordingly, key habitat requirements of goshawks must be provided for and protected through nondiscretionary standards to ensure the intent of the management direction will be met and not ignored or waived. | 3A1 |

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| 47 N | While the EA does present a few non-discretionary standards for management direction in one or two of the alternatives, those standards would also do little to actually protect goshawks or their habitat. For example, one of the most important habitat needs of the goshawk is a large, inviolate, closed-caption nest stand. On this need the proposed management direction provides the following standard, s-9, This standard would only prohibit logging of known nest stands while goshawks maintain active nests. A nest stand can, without violating s9, be completely removed by logging ... in short every known goshawk nest stand can be cut down under the proposed management direction without violating the standard. This is far from adequate protection of goshawk nesting habitat; it will not ensure goshawks remain well distributed or viable ... goshawk nest habitat - as well as PFA and foraging habitat - must be protected by concrete standards; if a decisionmaker wishes to make an exception to a binding standard to accommodate a planned management activity a site specific forest plan amendment can be proposed. | 1D5 |
| 47 O | What is meant by restrict? It does not mean the same thing as prohibit and it allows discretion to allow a wide range of activities in the nest stand. And why should livestock permits be excluded when livestock management activities could cause nest abandonment? How will the USFS determine whether an activity is not likely to result in nest abandonment? Why should nesting goshawks only be protected from activities for which the Forests issue permits? There is no defensible scientific basis for all of the loopholes in g-21; this non-binding and heavily qualified guideline will do little to help conserve goshawks in R4. | 1D5 |
| 47 P | For all of the alternatives considered in the EA, there is not a single proposed requirement for PFAs only a list of discretionary guidelines for how PFAs should be managed. Again, when discretion is given to ignore a habitat protection guideline, decisionmakers will often ignore that guideline. Therefore PFA habitat needs must be assured through non-discretionary standards which can be waived only through Forest Plan amendment. | 3A1 |
| 47 Q | The only management direction specifically focused on foraging habitat is g-16 and this provision would only apply to Alt. D. Other goals and guidelines would be used in other alternatives to create a mix of VSS purportedly for increasing or maintaining goshawk prey abundance (see g-3). However, the EA does not demonstrate that prey availability is limiting to goshawk populations in R4. Nor does the EA show that such goals and guidelines would actually increase or maintain goshawk prey abundance; it may be that prey are already abundant in most areas where the proposed management direction would apply. In fact, the VSS percentages appear to be entirely arbitrary with no scientific evidence cited in supporting the figures and goals. ... the VSS goals appear to be designed to foster timber harvesting, i.e., creating a mosaic of stands in different age classes so that a certain percentage of stands become old enough to harvest each decade, in perpetuity. | 1E1,2,3, 3 |

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| 47 R | The only reasonable and scientifically supported provision listed in the EA that would provide some protection of existing foraging habitat is s-2. This standard would protect most of the existing older forest foraging habitat until more information is obtained on goshawk foraging habitat needs. Proposed s-2 only applies to Alt. E and would not work to recover foraging habitat that has been lost due to timber harvest in past decades. Also, s-2 would inexplicably expire at the end of the current planning period. This appears to be entirely arbitrary: a habitat protection requirement should not expire based on a procedural time schedule; the protecting should continue to be applied indefinitely or until research shows goshawks do not need this protection to maintain well-distributed and viable populations over the long-term. | 2A3 |
| 47 S | Another problem with the proposed landscape VSS management direction is that all goals, guidelines and standards combine mature and old classes together. But old and mature forest conditions do not provide similar habitat values for goshawks; old is certainly better for goshawks for various reasons not the least of which is that goshawks require large old trees for use as stable nest platforms - trees which are not usually present in mature stands. Yet the proposed management direction gives USFS decisionmakers discretion to log all old forests and maintain only mature forests (should decisionmakers decide to follow the discretionary guidelines and goals at all). | 3B1 |
| 47 T | The management direction also provides no direction for maintaining SS-4C habitat which is valuable to goshawks. The adopted management direction should emphasize protection and recovery of older forest habitat where it exists. | 1B3 |
| 47 U | Making the proposed management direction even less useful and less credible is the failure to recognize the different values of different tree species to goshawks. Goshawks do not utilize all tree species for foraging and nesting; some forest types, such as spruce/fir are rarely if ever used by goshawks for foraging, nesting, or fledging. Example given. Under the proposed management direction, however, land managers could satisfy VSS goals, guidelines and standards by setting aside spruce fir VSS-5 and VSS-6 stands which are at high elevations or otherwise unsuitable for goshawk use; thus even if the proposed VSS management direction were followed the resulting VSS-5 and 6 may be of little actual value to goshawks and would not ensure viable well distributed populations in R4. The management direction should be refined to focus habitat maintenance requirements on forest types which are primarily used by goshawks. | 4C1e |

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| 47 V | Yet another disturbing and indefensible aspect of the proposed management direction is g-7 which allows for planned vegetative management treatments … g-7 would be adopted for al action alternatives except E so it is clear the USFS is favoring implementation of the provision. This is shameful. If a landscape is at or below minimum habitat capability for goshawks, there should be no discretion to implement vegetative treatments (i.e., logging) that would reduce habitat capability even further. What impacts would result if this guideline were adopted? The EA is silent on this issue. ... proposing loopholes like g-7 sends the message that the USFS isn't really serious about improving conditions for the goshawk and undermines the entire set of proposed management direction. | 3A1, B1 |
| 47 W | We were shocked to find that the proposed management direction does not identify any objectives related to goshawk population size, reproductive success, and distribution. Habitat protection requirements must be related to and evaluated based on actual population status. This is not done in the proposed management direction. We therefore request that new direction be developed to specify: desired population size and density for each planning area (i.e., NF or distinct unit thereof), desired goshawk distribution for each planning area, desired goshawk reproductive success rates and nest reoccupancy for each planning area in R4. | 3A3 |
| 47 X | If actual population conditions drop below desired population objectives, stronger protection measures should be instituted. Such adaptive management is particularly needed for goshawks in R4 where there are uncertainties about goshawk habitat needs due to the failure to monitor the effects of management activities on goshawks. No alternative listed in the EA would utilize adaptive management. | 3A3 |
| 47 Y | The draft EA presents 6 alternative management strategies for northern goshawks in Utah. … However each of the alternatives is built around the same set of standards, guidelines, goals, and objectives described in Appendix A. Thus the alternatives only differ in relatively minor ways - examples given. The proposed goals, guidelines and even standards are too weak to ensure conservation of goshawks in R4. The EA lacks an evaluation of alternatives based on sets of stronger standards and guidelines. Te agency should develop and analyze alternatives built around the following kinds of concrete mandatory measures - example follows. Other strong protection measures should also be developed and considered in the alternative spectrum. | 2A3 |
| 47 Z | … the USFS must establish more reliable and comprehensive monitoring of actual goshawk population sizes, distributions, densities, reproductive success rates, and nest abandonment rates. The proposed management direction is deficient in these respects. | 3A3 |
| 48 A | As a basis for guiding management, especially determining the impacts of alternatives, this document has serious deficiencies in its scope, scientific analyses and fails to meet the requirements of the NEPA process. | 3C |

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| 48 B | Rather than offer extensive comments, I would like to go on record that I agree with the comments, conclusion and recommendations submitted by Center for Biological Diversity | 3C |
| 48 C | I submit the following specific comments: :- The document fails to present and analyze the current status of habitat in a way that relates to the foraging requirements of goshawks. Specifically, forest cover categories that are provided are not a surrogate measure for understory habitat or prey density. | 4C1f |
| 48 D | The Forest Service fails to provide crucial information on goshawk densities, prey densities, known impacts of logging, livestock and human activities, all needed for efforts to prevent goshawk from being listed as threatened or endangered. | 4C1f |
| 48 E | The EA provides an unacceptable level of discretion to the agency providing such latitude for decisions that the continuation of poor scientific knowledge and traditional failure to curtail negative impacts is possible. | 3A1 |
| 48 F | The Forest Service fails to apply the best science on habitat, including their own scientists' studies, demonstrating the negative effect of livestock grazing on aspen reproduction in Utah. Mature aspen stands are important goshawk habitat and are declining significantly in Utah. | 1E1 |
| 48 G | I recommend that a full EIS be initiated and that key environmental correlates (rodent, rabbit, and bird pretty densities, understory forest structure, livestock grazing areas and densities, road and trail densities and other known factors) be made available on Utah GIS. | 2B1 |
| 48 H | Lastly, in view of concern for lynx, wolverine and a variety of interior forest carnivores and birds, associated with mature stand of trees these analyses need to integrate management for all species of concern in accord with modern conservation biology. | 2B5 |
| 49 A | The EA is unacceptable. The United States Forest Service which claims to be "Caring for the Land and Serving People" has failed to make a choice and prioritize commitments. The Northern Goshawk requires mature forests with 75% canopy. Therefore protect the remaining mature forests in Utah for biological viability. Stop rationalizing past extractive uses and abuse by using terms such as historic range variation (HRV) to justify logging and grazing. The people want natural forests, not managed forests where the forest is always moving toward some supposed ideal condition. Only an alternative that protects the remaining mature forests will protect the goshawk. | 3B |
| 49 B | Our organization supports Alternative E and the position of the Southwest Center for Biological Diversity (Tucson, AZ) in their comments dated Jan. 3, 2000. | 3D |

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| 50 . | ... I couldn't help but feel frustration about the concern for the goshawk prey or food source. About the time that the goshawk showed up in our area, or was first noticed, seemed to coincide with the introduction and proliferation of the wild turkey here. It seems to me these types of birds will surely compete for the same types of prey animals, namely the mice, snakes, lizards and all these types of animals. Surely we must take into consideration what animals are already here before we introduce something new to the area. **Rest of letter discusses problems with recreational use and abuse on Forest lands. | 4C1 |
| 51 A | We found the document confusing and confounding. Confusing because it was very difficult to follow and confounding because it ignores the best science and natural processes. Instead, it relies on manipulation of vegetative structure to "mimic" natural processes, resulting in increased timber sales under another name. Or, stated another way this is just like the numerous vegetation treatment proposals we see proliferating across the Intermountain Region which ignore causes of forest health problems and attempt to justify increased timber harvest as a cure for problems created by timber harvest. | 3B1 |
| 51 B | If the Preferred Alternative in this EA is accepted, the result will be further fragmentation of mature forests and decline of sensitive and other species. This has been documented in other Forests where loss of canopy over time has resulted in declines of Northern Goshawk. | 1C2 |
| 51 C | We see the reliance of this project on HRV as a wolf in sheep's clothing. If this standard is applied to each piece of land, it will be possible to totally fragment the forest and destroy the remaining mature or old growth forest. Since the range of variation can cover nearly all conditions from bare ground to old growth or late seral, this leaves the Forest Service unlimited in its ability to accelerate timber harvest under the guise of "forest health" or protecting goshawk. We see this as a sham to continue forest and watershed damaging activities while attempting to treat only symptoms. The result of this will be a return to the devastated watershed and forest conditions that created the impetus for the formation of the Forest Service in order to protect the remaining forest from overexploitation. | 3B1 |
| 51 D | You weaken any intent of goshawk protection by the statement on page 2-14 "While the direction adopted in this amendment will only be applied when it does not conflict with the primary use of an area…" which clearly negates any pretended intent to help the Northern Goshawk. Further, in Table 1 where you present the Acres and percent of total acres to which the Direction will apply, you come up with a range of 6.9% to 85%. This clearly validates our position that the EA is a sham and you propose no change in current policy at all. | 4C1g |
| 51 E | …the Preferred Alternative B is totally inadequate. It relies on the assumption that Northern Goshawk are habitat generalists. This was rebutted in the "Arizona Game and Fish Department Review of US Forest Service Strategy for managing Northern Goshawk Habitat in the Southwestern United States." Essentially the Forest Service ignored the Northern Goshawk morphology which makes it best fit for nesting and foraging in mature, dense forests. | 1B1 |

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| 51 F | The Forest Service claims creating open forest conditions to manage for prey species will favor the goshawk. To the contrary, the creation of open forest conditions will increase competition with other raptors which may have a competitive advantage over the goshawk under these conditions. | 1A2 |
| 51 G | Further, the lack of consideration of livestock impacts on understory vegetation, soils, mammals and birds is used to promote the myth that forest openings are lively, productive and diverse habitats and that these along with the edges created are needed. Our work has shown that forest openings are severely degraded by livestock to the detriment of soils, vegetation and animals that depend on healthy, diverse and productive systems. Livestock have reduced most forest openings to dust bowls dominated by bare ground and/or dense sagebrush with bare ground in the interspaces. You have ignored the voluminous science that documents these impacts and excluded livestock management from the guidelines. | 1E2 |
| 51 H | We categorically reject your Preferred Alternative "B". Instead, an EIS must prepared that includes analysis of all science and places priority on Northern Goshawk habitat requirements. If forest conditions are degraded by past actions such as timber harvest, livestock grazing and fire suppression, then these actions must be addressed rather than relying on vegetative manipulation without addressing livestock grazing and fire suppression. | 2B4, B1 |
| 51 I | We support an Alternative allowing roadless areas and known goshawk use areas to remain undisturbed by roads, timber harvest, livestock grazing, fire suppression and vegetation treatments as the only viable course of action. | 2A5 |
| 51 J | We adopt and support the position submitted to you in the comments by the Southwest Center for Biological Diversity and fully support the science and analysis presented therein. | 3C |
| 52 A | {First part of letter quotes the HCS and EA and the comments in the documents that say current habitat is capable of supporting a viable population…} The project team and authors should have also considered a third factor, and a very real possibility that various management activities to date are actually enhancing goshawk and prey habitats. | 2A1 |
| 52 B | So where is the problem?…. There is a massive disconnect between the science of the Assessment and the alternatives displayed in the UNGEA. There is simply no valid rationale that we can follow that translates the science of the Assessment into alternatives that meet the Purpose and Need in Chapter 1, 1.3. On this basis alone, you should either remand this fatally flawed document or choose Alternative A and trust your Forest Supervisors to continue the current good management until the forest plans are revised. | 2A1 |

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| 52 C | Why do most of the alternatives restrictively mitigate the timber and grazing resources ad nauseam and only allude in general terms to the restoration activities needed across the spectrum of ecological processes? The only alternative of the six considered that has a chance of maintaining the current satisfactory habitat for goshawk is Alternative A - No Action. Actually, there is plenty of action but there would be no change from the current management. | 4C1h |
| 52 D | With the possible exception of Alternative F, the other alternatives have been designed to address previous comments by organizations whose goals appear to have been to use the goshawk as a surrogate issue to further their preservationists agendas. | 3C |
| 52 E | Almost all of the suggested standards and guidelines are restrictive to vegetative management activities and will result in not being able to simulate HRV disturbances. This will further hasten the predicted decline in habitat capability. This specifically penalizes the forest users who form the backbone of our rural Southern Utah economy. You couldn't purposely devise a more sinister way of punishing rural counties in Utah than that which you may condone by allowing a group of overzealous, and at times misguided, interdisciplinary team specialists, to call the shots on these vital decision. | 1F2, 1D5 |
| 52 F | We would recommend adding the following guidelines to Alternative F for the final decision: g-1 which recognizes and provides for HRV including extreme events. G-6 which recognizes and provides for ecological scale vegetative structure. G-13 which offers less restrictive canopy closure parameters that default to HRV. | 2A5 |
| 52 G | We further urge the elimination of the following standards and guides from the draft Alternative F: g-4 which is unnecessary and at times penalizes ecosystem function. G-7 the goal must be to obtain ecosystem function, rather than the artifacts of old growth preservation agendas. g-15 HRV must be the determinant and not a guide that penalizes the broad scale goals of goshawk and its prey habitat management requirements. g-17 2-year survey requirements in addition to known data from current and known site surveys is excessive. s-9 unnecessarily inhibits needed treatments, including prescribed fire. Seven months protection is unreasonable and even exceeds the needs of the fledglings. g-25 this is an imposition of guides which may exceed HRV considerations. g-29 this guide simply duplicates existing grazing administration direction and is not needed. s-11 why does this apply to alternative F only? Please eliminate. | 2A5 |
| 52 H | Monitoring requirements m-7 should also then be eliminated in Alternative F which reflects our recommendations under s - 11. | 2A5 |
| 52 I | Your staff must consider and correct inconsistency between the Utah Northern Goshawk Environmental Assessment and the scientific Assessment and HCS. Is there a Forest Service line officer with enough fortitude to stand up and admit that this new goshawk science does not justify more restrictive management emphasis, and to select either Alternative A, no change, or the suggested modifications to Alternative F? Mr. Blackwell, we hope you are that courageous line officer. | 1F2 |

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| 52 J | We urge you to use the good science which has been handed to you to make a truly holistic decision benefiting both the health of our National Forests and the health of our rural communities and give us hope that this and future land management decisions will consider that the residents our rural communities are an integral part of the ecosystem. | 1F2 |
| 53 A | I appreciate the Web sight maintained on this subject as that has allowed everyone to read the actual documents being considered rather than the rhetoric that always tends to slant the facts to a particular view point. The findings reporting the position that we currently have both a viable goshawk population, and sufficient habitat to support the population is encouraging. This would support the idea that the job at hand is the maintenance of the current situation with attention to future changes in the current policy, but not a drastic change in current levels of activity on the forest. This is commendable on the Forest Service's part as it shows concern for the concept of multiple use of our forest resources. | 3C |
| 53 B | With the major threat identified as a change in fire severity due to catastrophic fire and insect infestation resulting in large scale habitat loss the challenge appears to be the USFS's ability to maintain sufficient control of these two conditions to maintain the proper mix of timbered land for the goshawk's needs. The current plan to harvest the insect killed Engleman spruce trees and reforest the acres through replanting is completely justified for habitat regeneration, prudent use of an other wise wasted resource, and fire management. To do nothing in these areas invites a major fire as the fuel load is tremendous in our forests at this time. A fire of the magnitude the our forest currently would support would be the single most devastating even to the goshawk habitat at this time. | 3C, 1A3 |
| 53 C | For future protection of habitat the control of bark beetle infestations should be considered. The decision not to react to the Spruce Beetle has probably reduced goshawk habitat more than any other management policy undertaken by the USFS, but I am sure that there would have been an outcry by the "Beetle Protection People" if the Forest Service had taken steps to protect the goshawk habitat at the expense of the "natural occurring beetle." | 1D3,4, 1A3 |
| 53 D | Why has the issue of management of a migratory bird like the goshawk been done piecemeal by breaking up the management areas in separate studies and action plans? The considerations for Utah forests are just that, for Utah only. Isn't this micro-management similar to leaving one stand of suitable nesting habitat in an oasis of grass land and expecting the goshawk to find and accept it? Why has one state at a time been studied and singled out a nation wide, interconnected, corridor of forests? this gives the impression of a hidden agenda to the entire process, or at least, an unnecessary duplication of studies and implementation plans costing millions of dollars. Migratory raptors should be managed on a national scale with regard to the total cycle of the raptors yearly cycle. This may make Utah forests more ore less important for any phase of the nesting, fledgling, hunting needs in the long view. This should be considered in an inclusive plan, not in a Utah plan. | 2B2 |

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| 53 E | The designated wilderness areas should be excluded from this and any other management plan. The purpose of the wilderness areas are just that, wilderness. I don't know what purpose they survey, but the plan was to leave them alone and let nature manage the lands. | 3C, 4C1g |
| 53 F | Administratively or Congressionally designated areas should be managed with in this amendment and any other USFS management plan. These areas have been stolen from the public at large and are the play things of the politicians. To exempt these areas from proper management compromises the overall state objective of your amendment. .... The greater risk to the goshawk habitat may well be the loss of the protection on the Congressionally controlled areas, as they seem to grow by political whim with no regard to public input or protection of the indigenous plants or animal life. | 3C |
| 53 G | The concept of multiple use of our forests is the true endangered species here. I have been told that the forests are managed with regard to all issues. Industry, recreation, and wildlife are to have equal value, with the management of the forests aimed at balancing these uses to maintain them while not causing an undue sacrifice to one, for the benefit of another. To protect the goshawk, which is not in imminent danger by all reports, at the expense of the timber, recreation, and grazing users, would be another attack to pacify the so-called environmentalists, who probably couldn't identify a goshawk if one flew by. | 1F |
| 54 A | From what I have seen and the science knowledge I have gained, I strongly support multiple use management with the well-being of goshawks in mind. | 3C |
| 54 B | Logging is essential for good forest health. As goshawks move from nest to nest, areas should at least be allowed to be logged (or even used in other ways) when a noticed goshawk pair is at the time dwelling in a nest any distance away from that area. Goshawks in our area have been fine when much-needed logging was carried out in a currently used goshawk nest, with a 30 acre radius as buffer zone around the nest. | 1D4 |
| 54 C | All sizes of trees should be allowed to be taken. Wildlife trees are already left in current timber sale management planning. Old, dying trees (or large bug/fungi infested trees) need to be taken so that surrounding competing trees also have room to reach their full potential as strong, healthy, large trees. | 1B3 |
| 54 D | Goshawks in our area have been just as prevalent and successful in new-growth forests as in old-growth. | 3C |
| 55 A | According to Traditional Navajo Religious Leaders, the haw species is a vital part of sacred ceremonies, which are still practiced today. This includes the goshawk of Northern Utah. It is also mentioned in the oral traditions of the Navajo elders, such as the Origin Stories. Due to the sensitive nature of the ceremonies and stories, I am not a liberty to discuss any further. For that reason, any efforts to prolong their existence are of the utmost importance. | 4A |

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| 55 B | The Navajo Nation has no concerns or objections regarding the project. However, the Nation reserves the right to offer and submit undiscovered information in the future, if need be. Therefore, it expects to remain on the consult list. | 4A |
| 55 C | It is highly recommended to consult other Native American tribes that are believed to have a cultural stake in the project. They need to be extended the same courtesy the Navajo Nation received in its consults. | 4A |
| 55 D | The HPD-TCP appreciates the labor of the Forest Service in consulting the Navajo Nation, pursuant to 36 CFR 800.1 ©(2)(iii). Have a wonderful day. | 4A |
| 56 A | {Letter starts by discussing the political climate which opposes logging in our national forests and favors conservation}… I immediately noticed the words "ecosystem management" had found their way into this document as they have so many other published by the USFS. While I support genuine strides on the part of the agency to update management techniques using new information about ecosystem function, it is immediately apparent to me that the State of Utah is NOT an ecosystem. True ecosystem management must necessarily transcend human-imposed political boundaries. Until the FS learns to define an ecosystem using scientific measurements, it cannot claim to be engaging in true ecosystem management. Especially since current forest plans in Utah are generally focused on goods and services rather than restoration and maintenance of ecosystem , it is difficult to trust that FS foresters are capable of this much-needed change. | 3A |
| 56 B | A brief glance at your goshawk website comment analysis gave me pause. It is obvious that the FS in Utah is dealing with a colorful regional constituency. I would encourage you to ignore those who tell you "if it ain't broke, don't fix it" and continue to deal with issues of sensitive species using preventative measures rather than after-the-fact strategies. | 3C |
| 56 C | It is no secret that Utah has many imperiled species within its borders. The State obviously has a vested interest in keeping the species from federal listing. Let me remind you that science is the best tool we have to protecting species and their habitat. Use it wisely. | 3C |
| 56 D | I appreciate the effort which Graham et al. went to in analyzing the situation for goshawk in the state. Given that effort and the substance of the team's recommendations, why would the FS put forth Alternative B as your preferred alternative? Not only does Alternative B ignore a good portion of your own science, but it also shies away from the very important issue of necessary grazing reform. | 2B4 |
| 56 E | It is noted throughout the EA that aspen cover types are preferred as grazing units due to their high forage production, and that aspen could be expected to respond favorable to reduced grazing pressure. As the EA repeatedly reminds us that the majority of guidelines applied would not have measurable impacts at the local/regional/state levels, it is a waste of resources to identify aspen regeneration as a priority for goshawks habitat, and then propose an alternative which makes no strides toward improving the cover type. | 1E1 |

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| 56 F | Beyond Alternative B's lack of grazing reform guidelines, it also shows weakness in two out of four of its key elements. Both elements promise to "address the importance" of using native plan species and sustaining old growth structures, but don't require, or even recommend, action toward these objectives. Especially given national problems with invasive and non-native species damaging wildland ecosystems, it seems particularly egregious for the FS to justify use of non-natives when "the ability of the native seed mix won't achieve project goals in a timely manner." It seems that what needs modification in that case are not our native ecosystems, but unrealistic FS project goals. | 4B |
| 56 G | Finally, I am skeptical that the FS can handle the responsibility of mimicking landscape-scale disturbance events, as Alt. B would allow. That element sounds suspiciously like a loophole to allow large clearcuts as they could be said to be "within the full historic range of variation." | 3A1 |
| 56 H | I find that a combination of Alternatives D and F would make the most scientifically-defensible alternative. Alternative D contains most of the recommendations for goshawk habitat as set forth by Reynolds et al. in their assessment. Alt. D allows for natural landscape-scale disturbance events, rather than requiring FS resources be put toward creating them. By using PFC to define acceptable HRV, this alternative maintains landscape structural patterns in a more conservative manner, thereby assuring consistent and connected habitat for the goshawk. | 2A5 |
| 56 I | With requirements for management of road use and development throughout all goshawk habitat, this alternative aims nearer to solutions to the formidable problems cause by roads. Although page 4-35 assures us that "because most National Forests currently have direction to keep open road densities at a minimum and disturbance caused by roads and skid trail are also accounted for under current direction to protect soil and water...", I must point out that on a national level, FS direction to keep open road densities at a minimum has done very little to protect our ecosystems from the degradation caused by unscrupulous and excessive FS road-building. Furthermore, FS road closure techniques have been shown to be less than effective in many separate independent tests: Electronic monitoring of 11 closures, conducted by the FS on the Sullivan Lake Ranger District, found that 53% of the closures had entries in excess of the standard of 2 or less entries per week. The standard was exceeded by 444%. 85% of these entries were unauthorized (Bertram 1992). | 2B5, 4C4 |
| 56 J | Hammer (1986) found that 38% of the Forest Service road closure devices inspected in the Swan Valley were being passed by conventional passenger vehicles without resorting to the use of tools or winches. None of the closure devices appeared capable of physically restricting use by legally prohibited "trail vehicles" and 92% of the closures lacked a sign indicating that "trail vehicles" were legally prohibited behind the closure. | 4C4 |

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| 56 K | Platt (1993) found that 55% of the closures surveyed on the Kootenai National Forest did not restrict motor vehicle use of the road behind the closure. Twenty-one percent did not effectively restrict conventional motor vehicles, another 25% did not restrict off-road vehicle use, and another 8% showed evidence of recent motor vehicle use, apparently by key, behind locked gates. | 4C4 |
| 56 L | A Fish and Wildlife Service survey of road closures in Mear Management Units in the Selkirk and Cabinet-Yaak Ecosystems showed that between 40% and 100% of the closures, per BM, were passable by all-terrain-vehicles. ….(Lobdell 1994, commenting on the 1994 IGDC access task force report). | 4C4 |
| 56 M | Alternative D required 2 years of nest surveys prior to activity, while they may delay certain activities, will assure that the needs of the goshawk are thoroughly considered before fire and insect-damage salvage sales are pushed through without the consent of the public. Smaller allowable opening sizes of mechanical treatments through all habitat acres will provide both increased aesthetic value and improved cover for the goshawk. | 2A5 |
| 57 A | Only Alternative E is consistent with the best scientific information regarding goshawk habitat requirements (literature cited). | 3D |
| 57 aa | To save PFC from its obvious arbitrariness, the EA asserts that ... (D-1). In other words, the PFC necessarily falls within the range of HRV and is therefore scientifically grounded by it. ... the EA does not present a single shred of evidence to support it. In fact, the EA presents evidence to the contrary. ... the Forest Service is proposing to create forest conditions which are inconsistent with the range of structures and processes believed to have occurred within the historic period defined by the HRV. ... the DHCs prescribed by the PFC are biologically arbitrary. They were designed to produce a regulated forest not a natural forest ... These deviations from HRV are not random. In a very predictable manner they only turn away from those facets of HRV that require reductions in livestock grazing and logging. | 1D3 |
| 57 B | All of the canopy cover minimums are guidelines not standards. This means there is no legal requirement to adhere to them. Indeed, it is unlikely that any of the Forests will implement them because each alternative expressly states that the recommendations are not to be implemented if they would result in canopy cover level outside the HRV and/or PFC. With the exception of E, all of the alternatives manage for canopy covers well below the known mean level used by goshawks in North America. | 1A1, 3A1 |
| 57 b | … the EA expressly states that it will incorporate the contradictory science in Alt. E but not discuss this science in relation to any of the other alternatives …This is a clear violation of NEPA's requirement to take a hard look at all the alternatives in light of established scientific information. ... Each of these alternatives in its own turn must be judged against the scientific evidence in the administrative record, information which has been presented to the Forest Service by the public during the scoping process. | 2A4 |

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| 57 C | All of the action alternatives (with a slight variation in Alt. D) recommend that PFAs be managed for the same canopy cover as the nest areas. The nest habitat analysis above, therefore, applies to the PFA as well. [All of the canopy cover minimums are guidelines not standards. This means there is no legal requirement to adhere to them. Indeed, it is unlikely that any of the Forests will implement them because each alternative expressly states that the recommendations are not to be implemented if they would result in canopy cover level outside the HRV and/or PFC. With the exception of E, all of the alternatives manage for canopy covers well below the known mean level used by goshawks in North America.] | 1A1 |
| 57 cc | Reynolds et al require that all of the 30 acre nest areas (including active, inactive, and alternate nests) be fully protected. The EA, however, appears to only require that currently active nests be protected from logging and only during the breeding season. If is not the Forest Service's intent, it should clarify that all established nest/PFA are to retain mature/old-growth and canopy closure features. | 1D5 |
| 57 D | It is clear that Alt. B, C, and F, by allowing canopy covering for goshawk foraging habitat to be reduced o 40%,are not consistent with the best available scientific information. Far from benefiting goshawks, these management schemes will create vast acreages which goshawks will avoid, thereby substantially reducing hunting opportunities. ... The failings of alternatives B, C, D, and F are exacerbated by the fact that they are only guidelines and need not be followed if they are believed to exceed the HRV and/or PFC. | 1A1 |
| 57 d | None of the alternatives require protection of historic nest/PFA areas. … all alternatives should establish nest/PFA areas in al territories known to be active after 1989 and it should permanently protect all established nest/PFA areas. | 1D5 |
| 57 E | No where in the EA is there any discussion whatsoever demonstrating that its desired habitat conditions are consistent with known goshawk habitat needs in North America, the western U.S. or Utah. … there is not a single sentence in the entire EA which cites or discusses the dozens of scientific studies which quantify the canopy cover required by goshawks for nesting or foraging. No attempt is made to compare this information to the canopy covers prescribed by the DHC or the alternatives. | 1D3 |
| 57 ee | The Forest Service should either require nest stands larger than 30 acres, preferably consistent with Woodbridge and Detrich (1994) or it should acknowledge and divulge the adverse effects of violating the Graham et al recommendation. The current EA mistakenly asserts that it is in conformance with Graham et al. | 1D5 |
| 57 F | The BA/BE notes nesting canopy cover requirements from scientific studies, yet it fails to mention that these values are greater than those prescribed by the alternatives (except E), or discuss what the effect of managing for lower canopy cover will be. Like the EA, the BA/E presumes the very thing it is supposed to analyze and demonstrate. | 1A1 |
| 57 ff | No direction is given for the establishment of nest areas. … all nest areas should be within the PFA and should encompass the best available habitat. | 1D5 |

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| 57 G | The EA is equally bereft of any citations to or discussions of scientific studies concerning goshawk foraging habitat preference. … Our previous comments contained substantial and extensive scientific discussion of … None of this information was used to assess the alternatives in light of scientific knowledge. --- The scientific record clearly shows that goshawks avoid areas absent large trees and closed canopies, they neither select nor avoid forests based on presence of high tree density ... The fact that a graduate student in 1979 documented that goshawks do forage in dense mature forests and then hypothesized that they might also use forest edges is an extremely weak justification for a 1999 management plan. ... None show avoidance of multi-story forests or dense mature forests. | 2A2 |
| 57 g | The grazing Analysis and alternatives are biologically deficient. … Reynolds and Graham both provide evidence that excessive grazing is harming goshawk habitat. Ogle and DuMond's (1997) review of historical changes in vegetation in Utah repeatedly identifies grazing as harming riparian and aspen forests. The EA asserts that aspen is one of the most important goshawk habitats in Utah while the scientific literature displays a very strong consensus that overgrazing is a major negative impact on aspen regeneration. The EA also asserts that fire suppression is very major factor pushing forests out of the HRV yet does not once mention the large body of scientific literature that demonstrates that livestock are a major cause of reduced fire frequency and overstocking the West (literature cites given). The EA's suggestion that there are differences of opinion ... is essentially meaningless in the absence of an informed discussion as to what those differences are and how they apply to Utah's forests. ... | 1E1 |
| 57 H | EA (4-30/31) states that maintaining 40% canopy cover outside of goshawk nest and PFAs is important … this argument is internally contradictory since alt. B defines the minimum nesting/PFA canopy closure to be 50%, how can managing forests outside nests/PFAs for 40% canopy cover produce a constant supply of nest/PFA habitat? ... it will destroy existing but unoccupied high canopy cover forests and prevent degraded forests from ever developing such stands.... Despite the existence of a vast body of scientific literature indicating that goshawks require higher canopy levels, despite the fact that we previously submitted much of this information to the Forest Service, ... the EA does not cite a single scientific study to justify its conclusion that managing nest/PFA area for 50% canopy cover and foraging habitat for 40% canopy cover will benefit goshawks. | 1A4 |
| 57 h | Alternative E is the only alternative which requires … with the following changes it will be biologically and legally sufficient: all past, present and future goshawk territories should be permanently protected, regardless of whether they are occupied in any given year; no logging should be permitted the nest/PFA area, regardless of whether it is an active or alternate nest; recruitment nest/PFA areas should be established at 1.5 mile intervals across the entire landscape; cattle grazing is a well documented threat to goshawk habitat and prey-it should be curtailed in all goshawk habitat; at a minimum two years of goshawk surveys should be completed. | 2A5 |

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| 57 I | The EA is inconsistent regarding foraging habitat. Alt. B (4-31) states that retention of at least 40% canopy closure … will not likely provide … how then can the EA [say] that Alt. B will benefit goshawks? | 1A4 |
| 57 ii | Contrary to the assertions of the EA, all of the other alternatives [A,B,C,D,F] will adversely affect goshawks and their habitat, causing a trend toward federal listing and loss of viability. If any of these alternatives are selected, a full EIS will be required because of the major negative impact on the environment and the clearly demonstrated scientific controversy. | 2B1 |
| 57 J | Since the EA does not even attempt to explain why it believes the resultant canopy closures will provide constant nesting habitat, the assertion [4-31] is an arbitrary and capricious conclusion. | 4C1i |
| 57 K | The assertion that Alternatives C and F will provide better foraging habitat than Alternative E is completely arbitrary since the EA provides no explanation of why it believes this. For example, do they better reflect the known habitat structures used by goshawks as determined by radio-telemetry studies? | 4C1i |
| 57 L | The analysis is also internally inconsistent. It states (4-31) that Alt. D will provide slightly higher amounts of higher quality goshawk habitat due to higher canopy closures in some habitat areas than Alts. B, C. and F. But if Alt. D is superior to C and F in this regard, Alt. E is even more superior because it provides more uniformly high canopy closures. How then can Alts. B and C provide less high quality goshawk habitat than D but more than E? This doesn't make sense. | 4C1i |
| 57 M | This alternative prescribes a variety of canopy closures in nest/PFA … The EA (4-31) states that it will provide slightly higher amounts of higher quality goshawk habitat due to higher canopy closures in some habitat areas than Alts. B, C, and F. Strangely the EA does not make a comparison with E in this regard. ... The presentation contains no reasoned relationship between the scientific facts of goshawk biology and the conclusion reached regarding effects. | 4C1i |
| 57 N | [Ref. 4-26] … the EA contains no discussion or scientific citations to indicate why it believes the goshawk will remain viable during the lifespan of his amendment-it simply asserts this to be the case. For example, it does not discuss whether the prescribed canopy closures are consistent with goshawk science ... it does not explain how managing for lower canopy cover than is documented in the scientific literature is likely to affect goshawk mortality, productivity, and occupancy. Nor does it reveal how many goshawk territories are currently known, how many have been logged, how many are within proposed timber sales, and how past logging and disturbance has affected goshawks. | 1C1 |

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| 57 O | The EA's assertion that Graham et al demonstrated that goshawks are currently viable in Utah is flatly false. Graham et al did not conduct a PVA nor did they examine the relative density, productivity, occupancy and survival of goshawks in logged, unlogged, and lightly logged landscapes (or by relative canopy cover) and then project that over the entirety of the National Forests ... made no attempt to estimate the likelihood of viability based on demographic or geo-demographic parameters. ... To conclude that it is viable because it has not been proven to not be viable is illogical and illegal. | 1C1 |
| 57 P | Graham … analysis is gravely flawed: The relative ranking of habitats is biased because it is not based on random or complete sampling or a methodology able to detect true habitat selection … the relative ranking of nesting and foraging habitat did not take canopy cover into account ... ignored the fact that current goshawk territories are not equal in productivity or occupancy ... using this quantified habitat condition specific data rather than generalized habitat descriptions would have resulted in a much smaller area identified as suitable for goshawks. | 1C3 |
| 57 Q | All of the alternatives (except E) will continue to reduce the canopy cover in ponderosa pine forests exacerbating the trend of extirpation from ponderosa pine forests in Utah. In violation of NFMA, this will inevitably cause them to not be well distributed across forest types in Utah. | 1A1 |
| 57 R | The EA does not discuss the historical and recent trend of goshawks abandoning ponderosa pine forests because of logging, does not mention that all alternatives (except E) will reduce the existing mature ponderosa pine canopy cover below that needed for nesting and foraging and entirely fails to analyze how the distribution of goshawks in ponderosa pine forests will be affected. | 1A1 |
| 57 S | … Johansson and White (1993) report that contrary to other areas in the West most goshawk territories on the Dixie, Ashley and Wasatch-Cache do not contain alternate nests. They note that all four territories with alternate nest stands on the Dixie were in mature-to-old forests while most of the territories with only one nest stand were in areas of smaller diameter trees and lower canopy levels. They suggest that logging has likely reduced nesting habitat in Utah. None of this information is presented, cited or discussed in the EA. | 1D5 |
| 57 T | … the EA presents absolutely no information, citations or reasoning to justify its claim that implementation of the project will not reduce or compromise goshawk viability, cause a trend toward listing, or result in loss of acceptable distribution. It merely presents an unsubstantiated assertion to the contrary. This violates NEPA's requirement to take a hard look at the likely effects of the alternatives. | 1C1 |

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| 57 U | The Forest Service's conceptual approach to the environmental analysis is fatally flawed and must be completely reworked. … the near complete absence of all quantitative information concerning goshawk habitat preferences; failure to acknowledge that Alts. A, B, C,D, and F fall well below the habitat needs of the goshawk, refusal to explain why the Forest Service plans to manage goshawk habitat so far outside the range of known goshawk habitat needs, and failure to disclose the likely effects of such adverse management. | 1A1, 2A4 |
| 57 V | … the EA fails to ask or answer the most basic of NEPA questions: what does the scientific record reveal about specific goshawk habitat needs? Are the pre-determined DHCs and alternatives consistent with these needs? What will be the effect of implementing canopy closure guidelines below those identified by scientific research as being necessary for goshawks? The EA's failure to analyze the adequacy of the HCS is based on the presumption that the HCS is the best available scientific information ... the HCS does not cite or discuss even a single goshawk field study. Why is there no analysis? ... | 1D3 |
| 57 W | ... declares that Reynolds et al is the best available information while failing to acknowledge the existence of any critiques of Reynolds or any divergence between it and published goshawk scientific literature. No attempt whatsoever is made to justify the assumption that the canopy cover, acreage limits and VSS distributions recommended by Reynolds are consistent with goshawk science. ... Reynolds is 9 years out of date, it cannot possibly be said to include the best available or most recent scientific information.... not only is this document clearly outdated, it has been strongly criticized by the USFWS, Arizona Game and Fish, academic biologists, USFS biologists, and environmental groups. | 1D2 |
| 57 X | The EA's use of the historic range of variability (HRV) … is inconsistently applied to the NEPA alternatives and management goals. A clear and consistent political agenda is driving this biological inconsistency - where HRV can be used to justify logging or limit canopy cover it is invoked as the scientific ground par excellence; where managing within HRV would limit logging or require management for extensive expanses of old growth and mature forests, the politically determined concept of proper functioning conditions (PC) is substituted instead. In every case, the substitution allows more logging and limits the extent of old growth and mature forests below and outside the HRV. | 3B1 |
| 57 Y | The EA excludes natural processes from consideration if they would lead to limits on logging and grazing or require management actions incompatible with its timber program (Table 5). … not one of the prescriptions requires that the keystone process actually be restored. Nonsensically, Alt. E even prohibits it. The failure to require natural fire regimes put a lie to the EA's assertion (4-11) that all action alternatives recommend that management actions emulate natural disturbance regimes as defined by HRV. | 3B1, 1A3 |

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| 57 Z | Appendix A does not include this as a goal for Alternative A but this is inconsistent with the text of the EA. The exclusion appears to be an error.… If the HRV is so important to ecological process then why is not even mentioned as a goal for structure? … It is arbitrary and capricious to use HRV as an ecological criteria when it appears to support logging but ignore it when it limits logging. … Neither the EA, the Assessment, nor the HCS present any ecological rationale as to why allocating more mature/old-growth forest would result in an improperly functioning condition ... No where has the Forest Service explained why these ratios are valid, consistent with goshawk science, with the HRV, or with ecological sustainability. ... ` | 4C1i |
| 58 A | … It is clear that the current EA and related habitat assessment are still firmly driven by the latter perspective. [logging revenue] Evidence for this includes an EA team dominated by individuals with forestry as opposed to wildlife training, a forester rather than a wildlife biologist or conservation biologist as a lead author on the habitat assessment ... | 3B1, 1D2 |
| 58 B | Before any further land-disturbing activities are allowed, a 3-year comprehensive survey of all suitable goshawk habitat should be required to establish a solid baseline of information about goshawk territory occupancy on the forests involved. This survey would identify areas where intrusive management should occur only if entirely compatible with maintenance of active goshawk nesting territories, and other areas of suitable but previously unoccupied habitat where a wider range of management options can be applied as long as 3-years of pre-treatment surveys confirm that no new territories have been established in the area since the baseline survey. We would also suggest that plans should be made to repeat the baseline survey every 10-15 years. To not use the EA process as an opportunity to effectively set the stage for a suitable long-term monitoring strategy simply because the time frame for application of the amendment is short is very weak. | 2A5 |
| 58 C | Scientific basis for habitat assessment and conclusion about currently viable goshawk population questionable. Graham et al. clearly articulate the limitations of the basis for the conclusion and clearly point out that current trends in many potential vegetation types are not favorable to goshawks. Nevertheless the conclusion of viability and stability is carried forth into the FONSI and EA as if based on solid science and well documented stable or positive trends. ... productivity assessments and monitoring needed to clearly document populations trends is almost entirely absent. Moreover the basis for judging what constitutes high quality nesting and foraging habitat for goshawks in Utah is still very weak. Basing Utah standards and guidelines on the Reynolds Southwestern Guidelines is problematic because the latter are based on several untested assumptions ... are the subject of considerable debate in the scientific comment, and because the habitat and environmental conditions in the 2 regions are largely dissimilar. ... should not be applied in Utah without rigorous validation of their applicability. | 1C1, 1C3 |

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| 58 D | Knowledge of what constitutes suitable foraging habitat for goshawks in particularly weak. Relatively little quantitative data on prey choice and foraging habitat selection is available for Utah goshawks. Therefore, there is little basis for establishing standards and guidelines to direct management of home range habitat outside of nest stands, yet as is the untested assumption in the Southwester Guidelines, suitable foraging habitat may be the key goshawk productivity. | 2A2 |
| 58 E | The determination that high quality habitat in Utah is well connected also rests on shaky ground … the EA appears to completely ignore the fact that dispersing goshawks may not move equally well across all habitat types. Thus although some patches of high quality habitat may be separated by less than 60 miles, if dispersing goshawks typically avoid the intervening habitat because of, for example, predation pressure, then the connection distance is irrelevant. | 1C2 |
| 58 F | Short amendment time frame poor excuse for inattention to important details. The short 4 year time frame is frequently used as an excuse to avoid addressing several planning elements that we believe must be considered for this EA and amendment process to be truly productive. | 3A2 |
| 58 G | .. The logic behind the compositional variation represented in the suite of alternatives is unclear. For example, Alt. E is generally the most conservative with regard to allowing management disturbance in goshawk habitat yet it is one of the few alternatives that allows management to mimic even extreme HRV events and does not include provisions for managing and monitoring the effects of grazing activities. This is a highly illogical combination which appears to be a deliberate attempt to ensure that Alt. E is not supported because of internal inconsistencies. | 4C1j |
| 58 H | … we believe the basis for prioritization as outlined in Alt. F is flawed. … it appears illogical to focus all attention on preventing changes that move habitat areas from high to lower quality for goshawks. It may be equally important to take advantage of opportunities which may arise from unexpected natural events to facilitate promotion of habitat areas from low to higher quality for goshawks. We believe that the prioritization focus of alt. F as currently articulated is unnecessarily restrictive and may compromise the Forest Service's ability to take advantage of opportunities to improve, as opposed to simply maintain, habitat quality for goshawks. | 2B3 |
| 58 I | We recommend that the Forest Service adopt Alternative D instead of Alternative F as its preferred alternative, with the following changes: require the use of locally adapted native species in management activities; adopt the minimal disturbance standards and guidelines for nest areas and PFAs currently assigned to Alt. E; and adopt the no disturbance in older structural stages standard currently assigned to Alt. E. | 2A5 |

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| 59 . | Please choose Alternative E It is the only alternative which requires … [with] the following changes : all past, present and future goshawk territories should be permanently protected, regardless of whether they are occupied in any given year; no logging should be permitted the nest/PFA area, regardless of whether it is an active or alternate nest; recruitment nest/PFA areas should be established at 1.5 mile intervals across the entire landscape; cattle grazing is a well documented threat to goshawk habitat and prey-it should be curtailed in all goshawk habitat; at a minimum two years of goshawk surveys should be completed. | 2A5 |
| 60 A | Alternative A, No action, completely fails to address the purpose and need for action and is unacceptable. | 3D |
| 60 B | --- Based on the importance of naturally occurring fire including extreme disturbance events, Alternatives B and E are strongly favored over Alternatives C, D, and F. | 3D |
| 60 C | Having narrowed the alternatives considered to B and e, the distinguishing features that favor Alternative E are the provisions for avoidance of nest disturbance by surveys and timber harvest. | 3D |
| 60 D | You may wonder how I could simultaneously argue for natural fire (and the resulting nest disturbance) and against nest disturbance caused by surveys and timber harvests [see 60C]. The distinction between the two has to do with the source of the disturbance. Fire is a natural process, surveys and timber harvest are not. | 3C |
| 60 E | Alternative E is the only option that requires the use of native seed for all management activities. | 4B |
| 60 F | I strongly recommend the selection of Alternative E for this project. | 3D |
| 61 . | … are very anxious that the habitat of the northern goshawk in Utah be maintained as well as other forest uses. | 3C |
| 62 | I am for the harvest of dead trees on the Manti-LaSal NF. I am concerned aout the wellbeing of the oshawk but I think the goshawk will be alright with the trees being harvested. | 2A5 |