

COMMENT ANALYSIS TABLE				
C#	L#	COMMENT	CAT 1	CAT 2
1	001	Para. 3, Purpose and Need, management activities such as large tree removal and fire exclusion are cited as primary causes for the declining populations of goshawk--what the desired conditions should be, but little, if any, mention is made of how these conditions will be achieved.	1000	
2	001	Judging from the primary problems of large tree removal and fire exclusion, it seems to me that a more "hands off" approach to forest management is the natural result of attempting to mitigate these past practices. Reduced levels of commercial logging seems to be one of the obvious solutions. I strongly support this possibility.	7100	1100 7300
3	001	I think a strong educational program will be required to gather sufficient public support for achieving the desired conditions.	8500	
4	002	Not convinced that allowing one species to dictate management strategies is wise or desirable. For instance, what will the Forest Service approach be when another species becomes of concern that may require considerably different habitat characteristics than that of the northern goshawk?	6200	
5	002	Discouraged to note in all of the documents pulled together for this scoping effort that only one small reference was made to The Wildlife Society Technical Review on Northern Goshawk and Forest Management in the Southwestern United States in 1996. ...TWS Review could find no evidence to indicate that northern goshawk populations were declining, threatened or endangered in the SW or anywhere within its range and found no evidence of a long-term decline in goshawk breeding populations. I find the same lack of evidence of a long-term decline in goshawk breeding populations. I find the same lack of evidence in the reports concerning goshawk populations in Utah.	6200	
6	002	The main problem is that forested lands in Utah are currently dominated by late seral tree species which is an unstable condition and has some negative connotations for goshawk.	2400	
7	002	Management for a goshawk food web is an important step for the long-term well being of goshawks. Step toward ecosystem management. Prescriptions suggested should be viewed in this context.	2400	
8	002	FS lands are important to a wide variety of species and management decisions must consider their habitat needs as well.	6200	
9	002	Management guidelines proposed are specific and will require considerable precision and cost to obtain. Is this degree of effort justified by the existing data?	8200	
10	002	Monitoring efforts will be required - will the FS be staffed and funded to make these measurements?	8600	
11	002	The TWS review suggested that implementation and monitoring of the interim guidelines should be viewed in an adaptive management framework. Once implemented, responses should be monitored and adjustments made depending on results. This is the framework that this effort should also be evaluated by.	7300	
12	002	It does no good for the credibility of the FS or well being of forest resources if complex guidelines are established on paper and then they are not achieved or even worse, measurements are not made to evaluate if desirable outcomes were achieved. Chosen strategies should be achievable. Seriously evaluate these concerns before management plans are amended.	8200	
13	002	Encourage the Team to consider and reference the many suggestions and recommendations made in the TWS report - highly pertinent to this process.	6000	
14	003	<u>Purpose &amp; Need</u> - There does not seem to be a legitimate basis for the project merely because there is a "suspected" downward trend.	7700	7600
15	003	There are currently sufficient management tools and policy in place to continue to give the protection needed for the Goshawk population and habitat.	7700	
16	003	If it is not broken there is not need to fix it	7700	7200
17	003	If the direction is there it is always going to be subject to interpretation (pg 2). You are trying to change the wrong thing.	8200	
18	003	<u>DHC</u> - I wonder how encompassing you will be in defining the habitat for prey to meet the needs of the goshawk. You could extend outside the conifer type to include habitat suitable for prey. (item 4)	2000	
19	003	How far down the prey chain will you go to protect the habitat?	2000	
20	003	<u>Encl. 3</u> - I assume that the exceptions would include grazing permits for domestic livestock. If not, how will they interrelate with the proposed management direction?	5300	

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21	003	How will the perpetuation of the aspen type community be achieved?	6100	
22	003	What direction will be taken to manage areas adjacent to the forest boundary and large tracts of privately owned land within the Forest boundary?	7400	
23	003	Encl. 4 Composition - native plant species from locally adapted seed sources - these may be desirable but not always possible; provisions should be made to use other sources or types of vegetation to provide for short time mitigation purposes.	6100	
24	003	No mention is made as to how far outside the timber types the mitigation is to be implemented.	6100	
25	003	Concern is in perpetuating the aspen type community and also in the spruce/fir type where early and mid seral would be acceptable but the late seral would not be beneficial to other uses in Forest Plan.	6100	
26	003	<u>Structure</u> - Concerned about the potential forest insect problem being brought about by maintaining older and mature stands of timber. There needs to be some provisions to take care of epidemic insect populations and to preclude their build up to epidemic populations.	1400	
27	003	<u>Home Range</u> - I am not convinced that it is necessary to provide for habitat connectivity completely across the state.	2400	
28	003	I think the area proposed is excessive.	2400	
29	003	Restriction on management activities and permitted human use will virtually not be permitted March 1 - Sept. 30 - most management areas on the M-LS are not readily accessible before and after these dates. There needs to a window where some activity can occur.	9000	5000 2400 7300
30	003	<u>Monitoring</u> - Table needs to be simplified and clarified. It is very confusing to decipher.	8600	
31	004	Strongly in favor of stated intent and scope of effort.	7600	
32	004	Goshawk conservation is important because of their ecology as an indicator species of healthy old-growth forest habitat.	2300	
33	004	Management plan must emphasize minimal road densities/permanent road closures.	7100	4000
34	004	Management plan must emphasize preservation of closed canopy/old-growth forest	7100	6300 6800
35	004	Management plan must emphasize adequate foraging areas	2400	
36	005	Since inferences about pre-settlement forest structure and especially the amount of late successional stages (old growth forests) are so important to the management direction for habitat functions for northern goshawks in Utah, I believe the USFS needs to further evaluate this issue. I believe a test of the hypothesis that a high percentage of the forest was in a mature stage would provide better guidance for assessing the state of naturally occurring ecosystems. A strong case could be made for much more closed forest than is currently proposed.	7100	6300 6800
37E	005	Encl. 3 [DHC] The document describes habitat in vague, general terms that would not easily be the basis for management action. Terms such as "diverse forest cover-types" and "high quality habitat patches", even "snags, down woody cover" do not speak in operational terms like species composition, vegetation structure at height zones that are important for the prey base. It is clear that a forest patch could have "diverse forest cover types" as measured by remote sensing but have a degraded vegetation mix on the forest floor. Roads, ungulate grazing (especially bunched sheep) and ORVs could create a biological desert from the perspective of small, herbivorous prey of goshawks. These are the habitat attributes that have been negatively impacted and these are the habitat attributes that need to be addressed.	2400	4000 5300 3100
37C	005	Monitor and assess the impact of livestock grazing on changes in forest structure and function that affect goshawks. These studies are especially important to assess the impact of livestock grazing on plant diversity, the food base for goshawk prey such as grouse: their young need insect foods, predator cover and shelter from wind and rain provided by structurally complex plant communities. (Bartos 1998)	5300	2400
37	005	Concern for goshawk habitat (and other interior forest species) needs to consider the effects on the forage availability of the prey of goshawks (hares, rodents, grouse).	5300	6100 2000
37D	005	Provide estimates of the degree of decline and rate of decline compared to "natural ecosystem processes." State which "management plans and policies on state and federal lands" are influential in the "great latitude in management." Are these recreation or grazing or ...?	8400	10000

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37G	005	Significance of the type of "open understories" - Reynolds & Graham are cited to document that open understories in "larger structural stages" are desirable. But if open understories have degraded vegetation, or none at all, then they are relatively useless as foraging habitat for goshawks since prey would be negligible or absent. The state, trend and causes of the trend in the understory are essential parameters to be monitored.	11000	2400 6100
37H	005	Goshawk adults in mixed open habitat and fledgling survival. My understanding of goshawk biology is that, like the spotted owl, the adults can survive, and are found, in open habitat in locations where the newly fledged young are susceptible to higher predation by owls as well as competition from other raptors for territories and nesting sites. Thus the presence of adult goshawks, as indicated by field monitoring, does not assure that the habitats will provide adequate recruitment for young goshawks to the population. Under these conditions the rate of predation, because of open, clear cut habitat or other mixed cover habitat, may need recommendations for more careful study.	11000	2400
37F	005	Processes that retard "a balance of structural stages across the landscape" USFS research (Mueggler, 1988; Bartos, 1998) shows that the failure of aspen to replace itself in the West (example Monroe Mtns), but is due to grazing. As Mueggler and Bartos have repeatedly demonstrated failure to manage the impacts of cattle is leading to widespread changes in forest cover including invasion by conifers and other species that simplify the ecosystem. Thus to suggest that some silvicultural prescription creating a "balance of structural stages" is necessary to return to "properly functioning condition" without addressing root causes of the original dysfunction (large herbivore grazing) can only result in expensive, ineffective manipulations.	6100	5300 11000 2000
37I	005	University theses contain important information on the influence of wild and domestic ungulates on vegetation aspects of prey habitat. The goshawk analysis should incorporate results from a MS thesis on ruffed grouse habitat in northern Utah (Landy, 1982 USU). This work points out the negative effects on chick survival of removal of the near ground vegetation layer. Another MS thesis (Jackson 1991, USU) showed a correlation between intensity of elk grazing of riparian vegetation in Yellowstone NP and loss of species diversity and density of passerines. This is relevant to the passerine food base of goshawks. USFS data on riparian vegetation condition in Northern Utah (fisheries surveys) is available for many years in numerous drainages. Since riparian habitat is important for goshawk prey and therefore is important goshawk foraging habitat, the trend data on vegetative condition should be incorporated in the statewide habitat assessments.	11000	2400
37J	005	I find that the widespread use of the words "appears to" reflects a basis inadequacy of the science base of the document. There is a failure to link known activities on the ground (recreation, grazing, timber cutting, control burns without subsequent restriction of livestock grazing) with the change in quality of the prey habitat base. Unfortunately the reliance of the analysis on forest cover types diverts attention and may mask serious trends in decline in habitat for goshawks in Utah. It is widely recognized by raptor biologists that a more accurate and ecologically realistic assessment of habitat conditions is possible with a more food chain-based level of analysis.	11000	2400
37A	005	Need to monitor the effects on the forage availability of the prey of goshawks (hares, rodents, grouse).	7100	2400 2000
37B	005	The scope of this analysis should be broadened to encompass national and international issues of large core areas, connectivity with surrounding states and migratory species (neotropical migrants that are interior forest species and the habitat needs of other sensitive and T&E species that require similar habitat to the goshawk (e.g. lynx, wolverine, etc.)	6000	8300
38	006	The goshawk does not like burned or complete chopped down areas, also the goshawk does not like to be in areas where there are motor vehicles. Man-made areas to nest in would not be accepted by the goshawk.	7100	1100 1300 4000
39	007	The goal is to first remove from the public land any industry that is productive to society such as timber, mining, and cattle. Clearly the goshawk project would accomplish this goal by declaring approximately 600 acres for non use for each active nest, each old nest, and each possible nesting site. I can see where this would quickly result in the entire Forest within the State being declared Non Use.	7700	7600

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40	007	The ultimate answer to the goshawk and any other similar project is for the counties within the state to collectively assume responsibility and jurisdiction of all public land within the county to be administered by local county governments. The federal agencies should be relieved of all responsibility and authority over these lands	8000	8500
41	008	The best answer to protect and save the goshawk would be to eliminate all timber harvesting from these forests. I favor this option.	1100	7200
42	009	What is the purpose in doing?	7600	
43	009	What good will it do for us or the Forests?	7600	
44	009	Why not let nature take its course and spend time and money doing something useful and beneficial to us.	7700	8210
45	009	If you would and will log the forests like they need to be logged the goshawks will increase and you will help the people too.	5100	1100
46	009	The lord is holding you accountable for the things you do in the Forests with public money so I hope you will let his spirit guide in doing what is best.	9000	
47	010	Does the focus on establishing management direction for the northern goshawk as individual species promote or conflict with the conservation of other special-status species? Are any other endangered, threatened, candidate or sensitive animals or plants on NF lands likely to be affected strongly by these proposed management directions, either positively or negatively?	6200	2200
48	010	Are the proposed management directions generally consistent with promoting overall "health" of the forest habitats involved this being effective to conservation of large numbers of common species as well as the northern goshawk?	6000	2000 1400
49	010	For informational purposes, five new RNAs were established via RF's DN dated 11/20/98, while vegetation treatments or other manipulative management actions are prohibited in these news RNAs, they are areas where any goshawk nests or suitable habitat that might exist would generally remain in an undisturbed condition.	7400	
50	011	I do not feel qualified at this time to comment - will continue to follow this project with interest and concern.	8500	
407	011a	Establish policy to ban logging of all old growth and mature timber	7100	
408	011a	Fully protect adequate foraging habitat within every goshawk home range as opposed to focusing on only nest stand protection	7300	
51	012	Prey - must be defined or listed.	2400	
52	012	Multiple Use - how will the maintenance of the forests for goshawk habitat fit in with the multiple use plan?	8400	
53	012	Desired condition - Habitats for goshawk in desired condition need only to be maintained. This issue is not as exacting for goshawk as for other uses where desired condition still needs to improve. Why the different standards?	7600	
54	012	Large trees - on the north slope the large trees are the mature trees which have progressed to the late seral stage and are ready for harvest. Harvest will come by one means or another, i.e. fire timbering, or death-tipover-rot. Large trees on the north slope are small by other area standards.	1000	
55	012	Proof of inhabitation - proof of existence of goshawk is needed before implementation of the plan.	7300	
56	012	It has come to my attention that some folks think the goshawk should be saved, however if what I have heard about the goshawk's aggressive nature is true, aren't we asking for further violations of the ESA? The aggressive nature of this bird has led to its demise, the people who love to camp in the bird's habitat also love to defend themselves and their families, and therefore if threatened by any bird they retaliate with a shower of lead.	9000	3000
57	013	While we currently are not opposed to having some management directive in our watersheds that promote habitat for the goshawk and in some situations these directives may be beneficial to protecting our water, we have some concerns.	7400	
58	013	If goshawk management directives are applied to our watersheds how will this affect us and what impacts will the directives have on our ability and rights to manage these watershed lands?	7400	
59	013	We will oppose any restrictions that affect our ability and rights to manage our watersheds.	7700	7400
60	014	The small amount of timber harvest you allow now will be decreased even more or be lost completely due to increased cost and area restrictions.	5100	

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61	014	It appears that it will affect motorized travel which will negatively impact hunting, fishing and general recreation and will give you an excuse to close more roads.	3000	4000
62	014	If a person gets a wood permit but can't go between March 1 and Sept. 31, why bother. Normally you can't get on the mountains before March 1 and a lot of times there is too much snow after Sept. 31.	7300	5500
63	014	It sounds like you will be telling people not only when they can cut, where they can cut but also what they can cut (and its not the wood the permittee wants)	5500	
64	014	It is ironic that the Forest Service can't spray for beetles because it doesn't have the money, doesn't let the dead or infected trees be cut until they are so rotten they are not worth much, you do have enough money to pay people wages to count goshawks. Get a real job.	8210	
65	015	Kill every goshawk you see - let's not have another spotted owl episode.	9000	
66	015	To much crap about studies and environmental crap - grade a road instead of this crap.	8210	
67	016	In most cases a no action scheme would be the best I don't believe it has been shown that the goshawk is in any greater peril than in the past. In fact, the raptors of our state are in much better shape now than in the past 30-40 years. I feel under present policy where we are managing these areas we are gaining and accomplishing most of the desired end results. Too many times effort and expense is being used and pushed by people who are self-serving when in reality the desired effects are now taking place.	7700	7600
71	017	I am interested in the data which was used to suggest the northern goshawk be listed as a sensitive species in Utah? This listing is not based on real science but rather political circumstances.	2400	2200
72	017	It may be important to have more than one habitat assessment (Graham) before developing a management plan for a problem which may exist at some future time -- maybe.	11000	
73	017	Perhaps the service is reacting to a problem which does not exist	7700	7600 7100
74	018	I believe you should consider the Bear Hodges Project on the Logan RD in your analysis of goshawk habitat. That project could impact much potential goshawk habitat.	7500	
75	019	The impacts of livestock grazing on goshawks needs to be studied, especially in ponderosa pine types.	7100	5300 6100
76	019	Maintaining 60-70% canopy closure over a reasonable proportion of the landscape is an important issue for goshawks to reduce predation/competition from red-tailed hawks and great horned owls.	7100	6800 7300
77	019	Planning for disasters is important too; USFS needs to manage for more than the minimum needed in terms of mature and old-growth forest types because fires and insects will take out more than you might predict.	6100	1300 1400
78	020	I support the management of habitat for the goshawk.	7600	2400
79	020	My desire would be that the management agencies recognize the non-measurable impact of falconry (harvesting very few birds annually) and minimize restricted areas as much as possible.	4100	
80	020	Do support the restrictions where active studies are in effect and want to work in support of these efforts	4100	
81	021	Habitat must be considered with any human development and encroachment such as ski areas and motorized recreation such as heli-skiing, snowmobiling, motorcycles, or ATVs.	3000	5200 7400
82	022	Will the management direction proposed for the northern goshawk also protect the Mexican spotted owl? Please explain how	2200	
83	022	Have you included expert opinions from the Fish and Wildlife Service and organizations such as Hawkwatch?	11000	8500
84	022	Have you considered the loss of forest habitat in logged areas and those that have already been sold to timber companies?	2000	1100
85	022	Have field surveys been completed and kept current on the goshawk and Mexican spotted owl?	2200	2400
86	022	What is the relationship of the goshawk to the Mexican spotted owl?	2200	2400
87	022	Will the management direction comply with the ESA?	10000	
88	022	What is the growth rate of trees in reforested areas?	6100	
89	022	How many acres have been reforested after logging in all Utah NFs?	1500	10000
90	022	How many acres of land have been logged in the past 20 years in Utah NFs?	1100	

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91	022	Has an increase in population (human) in and around forests had a negative effect on the goshawk and Mexican spotted owl?	9000	2200
92	022	How much of the old growth in Utah NFs has been lost or degraded due to fragmentation in the past 20 years? How much due to logging? Road building? Settlement by humans?	6300	1100 4000 9000
93	022	Is there any way to determine the estimated populations of goshawks, say 100 years ago? Or before European settlement?	11000	2400
94	022	Will the goshawk project also protect endemic plants? How?	6100	
95	022	Will old growth forest continue to be logged?	6300	1100
96	022	How much old growth forest is left in Utah NFs?	6300	
97	022	Will unroaded forest over 1,000 A be protected from roading and logging? Explain	10000	
98	022	Will the watershed be protected? How?	12000	
99	022	What is the relationship of the goshawk to the old growth trees? Which species of trees?	2400	6300
100	023	Enclosed are 65 references to articles from journals which may have some helpful information for the goshawk project.	11000	
101	024	I am deeply grateful for the work you have done and the direction you are moving.	9000	
102	024	We must not permit further road building, clearcutting, and selective harvest in our forests.	6000	
103	024	The goshawk requires an environment where natural processes are allowed to work.	6000	2400
104	025	Perhaps this should be <u>Accipiter</u> project rather than goshawk only. In the historical framework, the goshawk seems to be singled out only because of emphasis on clearcutting.	6200	
105A	026	Concerned that project would limit access and start too many top down trends	4000	
105	026	Concerned that project is a "top-down" management edict.	10000	
106	026	Concerned about adding to many "guidelines" down the road for other species and ending up with conflicting guidelines for the same goal.	10000	
107	027	What extra permits will be required for falconers as a result of this project (re paragraph dealing with special uses and permits required for them)	4100	
108	028	What impact will the project have on access management - any potential roads being closed.	4000	
109	029	Will this goshawk project interact and affect the Utah Game Commission's efforts to reestablish wild pheasant and turkey populations?	2000	
110	030	I think the goshawks are doing fine and logging should not be a problem for them.	1100	
111	030	These birds seem to like aspen trees and not old dead lodgepole pines. If you were smart you would remove these old lodgepole trees. If not for the birds then for fire protection because it will burn and when it goes i twill be a big one, burning up everything in its path as well as goshawks.	1100	2400
112	030	I think some of the problem is the blue grouse hunters mistake goshawks for grouse.	3000	2400
113	031	Because there are no graphs or charts of historic counts of goshawk numbers there is no means for the reader to relate to the efficacy of the proposed mitigation efforts, i.e., one has no way of knowing if the project represents "overkill" or if it represents too minimal an effort in any particular region. I am fairly confident this data must exist somewhere - could you supply a chart, graph or map supplement?	11000	
114	032	Your research is interesting and I would be interested in involving my biology classes in your research	11000	
115	033	My observation from working in wooded or forested areas is 8 out of 10 species of birds will land in the tallest trees that are available but they will also land in shorter trees and I have seen the Goshawk perched on fence posts. Do we need to set aside so much old growth areas?	6300	2400 11000
116	033	With the bug problem as bad as it is forest-wide, we need all of the birds protected that eat the bugs as their main source of food, goshawk's prey on these smaller birds...As blocks of goshawk habitat is set aside will or is there a plan in place to control insects and diseased areas or is that block of timber set aside forever never to be managed?	1000	1400
117	034	Imposes additional monitoring requirements when the FS budget and staff constraints appear to be limiting the ability of the FS to properly manage the Forests even today.	8200	8600
118	034	I find the plan overly complex and biased.	7300	
119	034	It is doubtful that this plan is capable of being implemented successfully because it totally fails to address livestock impacts to the habitat and prey base of the goshawk.	5300	2400

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120	034	It is doubtful that this plan is capable of being implemented successfully because it doesn't recognize the current state of decline of aspen in the Intermountain Region due to livestock, logging, and fire suppression.	6100	1100 1300 5300
121	034	It is doubtful that this plan is capable of being implemented successfully because it appears to rely on vegetative manipulation exclusively while stressing natural processes. (livestock grazing)	6100	1100 1300 5300
122	034	It is doubtful that this plan is capable of being implemented successfully because the scoping document stresses the importance of large trees yet current practices of vegetation manipulation, contrary to natural processes, focus on removal of large trees to prevent infestations.	1100	6000
123	034	It is doubtful that this plan is capable of being implemented successfully because the exclusion of wilderness areas is a mistake. Again, natural processes should prevail here of all places. (livestock grazing)	7400	5300 7300
124	034	It is doubtful that this plan is capable of being implemented successfully because the plan omits that portion of the Cache NF in Idaho.	7300	
125	034	An alternative should be included in the EA that sets aside sufficiently large contiguous areas in each NF that excludes extractive industries - logging, livestock grazing, and mining.	7100	
126	035	This project/study could have major impacts upon electric utility corridors depending upon the final decision made.	7300	7400
127	035	Very concerned with any special designation which might occur on adjacent forest properties which may have potential impacts upon our property or existing and future electric utility rights-of-way.	5500	10000
128	035	Opposed to any action which may impair or further restrict the use of our private property and rights-of-way and action on adjacent forest properties which could also impact us.	5500	9000
129	035	As a stakeholder in this proposed project, we would like to be involved in the process. We desire to be involved with the study process prior to the final decision being made.	8500	
130	036	A recently advertised open house provided no opportunity for public input in a formal setting.	8500	
131	036	The phrase I heard repeated over and over was "that is not our intent," but intent is not what the written document says.	7300	
132	036	This plan as purposed has all the appearances of special interest groups attempting to circumvent our legislative bodies to accomplish purposes not authorized through law	10000	
133	036	Would allow only permitted activities (permitted not defined) on all forests in Utah from 3/1-9/30	5500	
134	036	The plan says they need 180 A for each nest plus an additional 420 A for fledgling area thus essentially closing the forest to public use for the entire summer season.	2400	
135	036	With the potential effects of this plan so far reaching, I would strongly encourage our elected officials to immediately become involved.	8500	
136	036	The DWR, USFWS, FS, and the BLM say that the goshawk is not on the decline and in fact is doing very well with the current management practices. The old adage which says "if something isn't broke don't fix it" sums up my feeling on this as no part of this plan should be implemented.	7700	
137	037	I am very concerned that old growth, roadless forests are being cut (and are being proposed to be cut) in spite of northern goshawk presence and potential nesting sites are endangered. It is my fear that logging could continue even though the bird is present if regulations are not set at optimum levels to protect the northern goshawk.	1100	6000
138	037	Please include country east of Kamas (the Weber and Provo Rivers headwaters - we call it the proposed Mt. Watson Wilderness) as optimum goshawk habit - this must be a simple plotting error.	2400	
139	037	Having seen goshawk in the dark pines of the Uintas' north slope, I am ecstatic that the Goshawk Team is seeking protection for this wild symbol of what remains of our great forested wildlands. I support protection of this raptor over any development scheme that may prevent or impinge upon its successful existence in Utah's forests.	9000	
140	037	Protection of the goshawk in Utah can best be accomplished by your resolute recommendation of an end to destructive logging that removes old growth forests from the habitat base of these wild birds. Logging is a sure deterrent to goshawk success.	7100	1100 6000

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141	037	Wilderness acreage like that on the Uintas is particularly important to the bird since the Uintas offer massive acreage of untouched, undeveloped country that the raptor requires for nesting, rearing, and existing away from the presence and "business" of humans.	7400	2400
142	037	I recommend a strong management scenario for the northern goshawk; we fertile humans can surely grant this fragile bird a few places where it can flourish without our constant presence and influence.	2400	
143	037	I am particularly concerned about the future of Uintas goshawks.	2400	
144	038	My idea is to harvest the timber but leave abundant habitat for the hawks. I suggest that you require those who cut and haul off the timber to leave goshawk homes. I will leave it to you to design these homes, but I suggest that holes should be drilled into strategically placed or located by nature into hollow trees --- even pieces of hollow trees could be secured permanently to green, live, leave trees. Under this plan preserving the northern goshawk would be successful and easy to accomplish. (drawing provided)	7100	
145A	039	Recommend a slow, conservative approach toward any further destruction of goshawk habitat. Successful management of goshawk populations depends on a thorough understanding of the broad habitat usage patterns	7100	2400
145	039	Logging and road building are destroying and fragmenting goshawk habitat. .	2400	1100 4000
146	039	It is noteworthy that many goshawk studies that have provided important information about the goshawk's life history have occurred in habitats that have already been disturbed. Thus, the data on which management decisions are currently based is incomplete and does not adequately represent the habitat required to ensure healthy viable goshawk populations. The proposed management direction could likely continue this trend.	11000	7300
147	039	Goshawk habitat standards should include two broad issues. The first is the need to determine habitat needs based on total home range usage rather than just nesting habitat. The second involves the impacts of continued habitat fragmentation of the goshawk's home range.	2400	11000
149	039	Population monitoring projects are needed as a start toward evaluating trends over time.	11000	
150	039	The data being gathered in R4 is only occurrence data and is lacking trend analysis or reproductive success information.	11000	
151	039	There is little baseline information on goshawk populations in Utah and the nest sites that have been surveyed have largely been associated with timber sales.	11000	
152	039	Studies should focus on foraging behavior during both the nesting and winter seasons.	11000	
153	039	There is little existing published data addressing which habitat types are most frequently used by foraging goshawks. Therefore it is impossible to accurately judge the pattern of the overall forest mosaic across the goshawk's home range. This mosaic is what determines whether the foraging habitat will adequately provide the energy needed by the goshawk. Typically nesting and foraging territories have been defined by vegetation characteristics. Future research should focus on actual bird usage patterns. The proposed management direction fails to do so, possibly because the data has not been collected.	7300	2400 11000
154	039	Presently little is known about how dispersed juvenile goshawks select new habitats. Current management strategies are designed to protect those territories that are already occupied. Without this knowledge it is difficult at best to ensure long term genetic viability of goshawk populations. Currently nest buffer strategies are being implemented to ensure both continued logging and viable goshawk populations. However there is little data quantifying their success because the effectiveness of any strategies intended to mitigate the impacts of logging to goshawks has gone completely unmonitored. Again, the management direction proposed does nothing to assure protection of future goshawk habitats or a proactive monitoring program.	7300	2400 11000 8600
155	039	Data on the habitat needs and population cycles of key goshawk prey species is an important element in designing management strategies and one that is currently lacking in R4. This data should have been compiled prior to the development of the proposed management direction. (references other studies in letter--Crocker-Bedford, Zinn, Tibbitts, Austin)	7300	11000

C#	L#	COMMENT	CAT 1	CAT 2
156	039	There is a need to protect remaining tracts of large, intact old growth forest habitat. In order to ensure continued viable populations of goshawk in Utah, areas of prime foraging habitat must surround nest sites. It would seem prudent to ensure that at least 5,000 A be provided as foraging habitat. Certain characteristics must be maintained within this 5,000 A of forest. The overstory canopy should provide 75-80% cover. Tree density and size should be determined based on the actual habitat the goshawk pair is nesting in. Nests, including the alternate ones, should be located at the center of this area in order to protect them from the effects of the forest edge. (references Crocker-Bedford)	7100	6800
157	039	Attention should be paid to the overall structure of the large stands intended to serve as foraging habitat. They need an open understory as well as large trees and snags to serve as the perches from which goshawks hunt. One study recommends that 4 snags per acre be maintained near goshawk nest sites.	7100	6600
158	039	A large expanse of coniferous old growth forest will probably contain a variety of different successional stages and forest components utilized by the goshawk. Within a large unharvested tract, it seems more likely that this diversity of micro-habitats will be maintained. Given that the actual habitat usage patterns of a goshawk are largely unknown in Utah, management strategies should aim to preserve all of the pieces of this mosaic that still remain. Priority should be given to protecting the remaining roadless tracts of mature forests. These large areas represent a potential opportunity to ensure goshawk habitat before it is altered and key components are lost.	7100	8800
159	039	Crocker-Bedford recommends the complete avoidance of timber harvesting throughout the entire foraging range of the goshawk until more is known about managing timber activities in a manner compatible with goshawks. Even outside of the nesting season, logging would be precluded in this area. This conservative approach is particularly warranted in Utah since little specific information about goshawk habitat usage is available. Even strategies such as understory thinning should be avoided in these areas until more is known about their direct, indirect, and cumulative impacts on the goshawk or its prey.	2400	11000
160	039	Crocker-Bedford recommends that another tract of land, continuous to the first 5,000 A tract be maintained as marginal foraging habitat. This area should also be 5,000 A which is the upper end of the 2,500-5,000 A recommended.	7100	2400
161	039	Current management practices are creating marginal territories that are fragmented and declining in overall quality. Habitat that is presently marginal does not allow for future change either through natural forces like fire or through continued human manipulation. The proposed management direction for goshawks and their prey will continue this trend and therefore is unacceptable. Recommend that the strategy be reevaluated and rewritten to demonstrate a credible program that will ensure goshawk viability. This new document should be put out for peer review and public comment	7300	
162	039	With respect to the proposed management direction, it includes 16 guidelines for goshawk management and only two standards. Guidelines are the loophole that allow management activities to proceed unimpeded. It's unfortunate that the Forest Service now considers standards to be a constraint on management practices. Standards are legitimate requirements to be followed in the best interest of a natural resource and should not be viewed as constraints to timber harvest. The two standards listed are contradicted by numerous guidelines so there is no assurance that they would actually be effective	7300	
163	039	The purpose states "maintain or restore".. if the Forest Service simply maintains the status quo how will that relate to the "suspected" downward trend in goshawk habitat and/or populations?	7600	7300
164	039	In the EA, we request documentation on how the proposed strategy represents the best available scientific information on the northern goshawk and its use of habitat in the State of Utah.	11000	
165	039	Object to the use of any non-native species in management activities. The document concedes that native plant species are preferred and that non-native species have the potential to cause systems to move outside of HRV. Thus, how can the use of non-native species be justified?	7100	7300
166	039	Object to the loophole in the Structure goal that would allow variation from the guideline if the action was assessed through the BE process and the BE concluded that the action is consistent with the intent of the conservation strategy. If the action was consistent with the intent of the conservation strategy there would be no need for a BE and a variation from the recommendation.	7100	7300

C#	L#	COMMENT	CAT 1	CAT 2
167	039	Disagree with all of the "variation which would cause further evaluation and/or change in management direction." Those for snag and down woody material appear to be arbitrary; for habitat connectivity and diversity no time frame is stated for the landscape assessment which the change in management direction would be based on and the territory occupancy requires a consistent 20% decline over a 3-year period which is occurred would severely threaten population viability and would be reacting to a situation that could have been prevent proactively. The intent of monitoring should be proactive, not to document failure and then react to the situation.	7300	8600
168	040	With forest management activities moving toward "restoration" and "properly function condition" economics and effects on man's needs from these forests should weigh as high or in balance with the management of all species. How is this project addressing the effects of changing sideboards on treatment scenarios and the local dependent communities ability to maintain a diversified economy?	5000	9000 5100
169	040	Will the need for "connected habitat" preclude the establishment of possibly needed access in areas not affected by the new proposed roads policy?	4000	10100
170	040	How will the inability to mangle some stands for desired future conditions and connectivity, due to the new roads policy, affect the availability and quality of habitat for the northern goshawk?	10100	2400
171	040	For years we have been able to supply the wood product needs of the people of this country while providing jobs locally. Sustaining those elements and a local industry should be considered as in-depth as the reestablishment of natural processes.	5100	
172	040	Strongly disagree with the exclusion of this direction on concentrated recreation use and other areas outlined on Encl. 3. In keeping with the current "broad brush" approach to land policy and your desire to maintain connectivity, all forested land should be included in this direction no matter who it might effect. An example might be the closure of a camp ground or reforestation of a ski run to ensure the sustainability of needed elements for the northern goshawk and its prey. If these areas are allowed special status, then we request that the suitable acres identified for timber production in current Forest Plans be also exempt from this direction as these areas re managed for other purposes as defined by current policy and regulations.	7400	8400 5000
173	040	In the "need" section, reference is made to the exclusion of fire from the forest and woodland ecosystems. It is inferred then that fire will play a large role in the execution of this project. We would stress that every effort should be made or presented to recover usable wood products from areas where planned fire is used.	5100	1300
174	040	Consideration should also be given that other components of ecosystems have also changed since the exclusion of fire such as deterioration of our air quality. This project should address the use of fire and risk involved to air quality, private land, irreparable damage to soils from fires which leave prescriptive conditions and the release of stored carbon. Also, the economics of the use of fire as a management tool should be addressed.	1300	8400
175	040	How fire risk is measured could be a direct relation to canopy closure. We were curious how the historic range of variation was or will be established for canopy closure. What is the basis for establishment of this range?	1300	6800
176	040	We still wonder how this project can meet its stated purpose of providing properly functioning forested habitat with connectivity given current restraints such as the new roads policy and other forest management restraints?	10000	8200
177	041	We support the use of the entire state of Utah including its diversity of land ownerships as the assessment area. We believe that this scale is appropriate for mobile, wide-ranging species such as the Northern Goshawk.	11000	
178	041	We agree with Graham et al that a goshawk conservation strategy would benefit from extension of the analysis area across state lines. We suggest that extension of the analysis area in the northern and southeastern sections of this state be included in future habitat connectivity and population viability analyses (PVAs)	11000	
179	041	We believe the coarse-filter approach to habitat assessment, use of GAP analysis and FIA inventory data, is appropriate at the state scale and successively finer-grained analyses are appropriate as scale approaches the project level.	11000	
180	041	While evaluation of habitat connectivity at large scales is undoubtedly appropriate for the goshawk, evaluation of connectivity and other habitat characteristics for goshawk prey (and other species) should be done at scales appropriate for those species.	6400	2000 11000

C#	L#	COMMENT	CAT 1	CAT 2
181	041	We applaud the attention given to monitoring. Monitoring is essential to ensure management guidelines are being followed (implementation monitoring) and to determine whether prescribed actions are producing the desired effect (effectiveness monitoring)	8600	
182	041	In addition to monitoring habitat change (Conservation Strategy p. 9), we suggest that planning should be integrated across spatial and temporal scales and monitoring should be used to ensure the habitat change occurs as planned. The Conservation Strategy states that habitat change detection is "accomplished by identifying changes in habitat caused by management activities or natural events." GIS and forest growth models allow projection of effects of planned management activities at scales from stand to landscape. Therefore, managers should not be limited to a passive role (ie, when conditions are found to be "trending away" from DHCs), rather, they should also take an active approach in which proposed management activities are evaluated according to their projected effect on DHSs over time. Thus trends may be prescribed instead of described and conditions that require corrective actions can be avoided by careful planning at the appropriate scale.	7300	8600
184	041	We support the comprehensive consideration of potential natural vegetation (PNV), cover type, and vegetation structural state (VSS). Guidance provided in the proposal and related documents is an excellent step toward ecosystem-oriented vegetation management. Guidelines for desired structural and compositional characteristics as they relate to goshawks and other species should be continually refined.	8900	6000 7300
185	041	The proposal appropriately addresses desired habitat conditions (DHCs), the need to maintain a balance of structural states, and the sustainability of VSS. However, with respect to the last point (sustainability), we know of no process that has sufficiently addressed sustainability of VSS mixtures over the long term. We suggest the inclusion of temporal change analysis in planning and management. One important benefit that may result from such analysis would be a lower risk that current decisions might preclude future management options.	7300	
186	041	We believe that the habitat management approach (ie, consideration of multiple trophic levels) taken by Reynolds et al, Graham et al, and the current proposal is appropriate and progressive. Management for goshawks should provide benefits for many other species. However there are probably situations where attainment of DHCs for goshawks could create conditions that conflict with other management goals. For example, the DHC description states a desire to have "trees irregularly spaced" in goshawk forage areas. Under some conditions, clumped trees may increase susceptibility to bark beetle attack; in fact, some conditions that have been documented to be desirable for goshawks have also been documented to be highly susceptible to such attack. We suggest that potential conflicts with other species' requirements and other desired future conditions be anticipated.	7300	6000 1400
187	042	We commend the Forest Service for initiating this project to ensure the survival of the northern goshawk.	9000	
188	042	We feel that the purpose of the suggested plan, to maintain or restore functioning forested habitats for the goshawk and its prey in Utah forests, is important.	9000	
189	042	We feel that the multi-forest statewide plan is on a scale large enough to ensure viable goshawk populations in the future.	7300	
190	042	The paragraph about the requirements to achieve desired habitat conditions is fundamentally sound, however, it is too general. Additional discussion of native ecological processes which goshawk inhabited forests and plans for restoration and protection of degraded habitats needs to be provided along with what changes will need to be made in the Forest Plans to accommodate these requirements.	7300	
191	042	The properly functioning condition of a forest for the northern goshawk and prey is not adequately defined (e.g. what would constitute a properly functioning forest vs. an at-risk or non-functioning forest?)	6000	
192	042	We support the Forest Service in protecting and managing 30-acre areas around active, alternative and replacement nest sites as well as a 420-acre post-fledgling area. These areas are critical in the life cycle of the goshawk.	9000	
193	042	We feel that there should be more discussion and/or goals geared toward goshawk prey base as this is equally important to their survival.	2400	7300

C#	L#	COMMENT	CAT 1	CAT 2
194	042	We feel that the wording of paragraph VI on page 4 of the proposed action should be changed to clarify that this refers to FS permitted activities. We feel that the goshawk take permit issued by the state of Utah should not be restricted in this manner.	7300	5500
195	042	Request - mutual review, by the Forest Service, DWR and falconers of any decision with the potential to restrict access to eyas goshawks by falconers. This review would be done prior to any falconry restrictions being placed in effect.	4100	
196	042	Request - eliminate any current restrictions related to falconer access to eyas goshawks except where active studies would be effected by activity related to harvesting eyas birds. Any policies put in effect that restrict access to goshawk nests by falconers need to recognize the non-measurable impact of falconers on the goshawk resource and a balanced and biologically equitable policy related to falconry activities and goshawk implemented.	4100	
197	042	Request - where mitigating restrictions are necessary, specifically include the intended expiration dates related to the restrictions, the rationale of the restriction, and the activities and objectives related to the mitigating activity.	4100	
198	042	Request - provide education opportunities for the logging interests to help them understand the biological rational behind their restrictions and the inherently self limiting, biologically sound harvesting activities of falconers.	9000	
199	043	Before the goshawk is considered to be in any type of danger or decline, a population and demographic analysis should be completed.	11000	
200	043	It is obvious looking at the graphs of both the Wellsville and Goshute migration studies of the northern goshawk trends in Utah for the past 20 years, the goshawk does not appear to be in any type of decline, rather the population changes may be a reflection of prey base fluctuations. It appears that populations of migrating goshawks have increased over the past six years.	11000	
201	043	I personally am happy to see the advocacy of critical habitat conservation and management for the future of the goshawk. Before listing this species I would hope that more consideration is applied to population studies and prey trends as well as the habitat assessment that has been completed.	2200	
202	043	I would hope you will give careful consideration before advocating listing the goshawk as an endangered species at least before more data of specific populations is available especially considering areas of high risk.	2200	
203	044	Goshawks are dependent on old growth forests for procreation, they must have diverse and large forest habitat completely isolated from humans, they will not prosper in clearcut or harvested forests and natural forest fires are a part of forest health. If humans try to intertwine with the goshawk, this rarely seen bird will lose - please that formula is always correct and we must not keep trying it to see if we can get it right at the expense of other living things.	6000	2400
204	045	The management recommendations for the northern goshawk in the Southwestern United States by Reynolds et al provides specific prescriptions for managing nest areas, post-fledgling areas and foraging areas. In particular, the plan states that periodic prescribed fires are the preferred treatment followed by lopping and scattering of logging debris. The plan emphasizes that piling of debris need to be limited to avoid displacing and destroying the forest floor vegetation. In addition, bulldozer use is not recommended and the plan advises using skids instead of roads in logging operations. While much of the proposed Utah Conservation Strategy is based on Reynolds et al., these specific recommendations have been left out. I was unable to find any explanation based on the biology of Utah forests as to why the Reynolds et al document presents specific recommendations while the proposed conservation strategy for Utah is very general.	11000	2400
205	045	The proposed Conservation Strategy does not consider the cumulative effect of numerous small projects. When an area as large of the state of Utah is being considered, no single project is likely to have a significant impact on goshawk populations but many small projects will have an impact. The cumulative impact of projects needs to be addressed.	8300	11000
206	045	The proposed Conservation Strategy does not address the effect of habitat modifications on non-managed lands in the vicinity of managed lands. As northern goshawks forage over extensive areas, they will often cross boundaries between wilderness areas, private lands, state and federal managed lands. Habitat modifications on private lands or succession in wilderness areas may require adjustments in the management of adjacent areas.	8300	

C#	L#	COMMENT	CAT 1	CAT 2
207	045	Leslie Rissler's Master's thesis (1995) on northern goshawks in the eastern Cascades points out the importance of an open understory in goshawk nesting areas. The suppression of natural fires in mixed-conifer stands has dramatically altered understory density and has degraded goshawk habitat. This issue needs to be explicitly addressed in the Conservation Strategy.	7300	2400 1300
208	045	Pre-commercial thinnings of early seral stages of lodgepole pines could be used to decrease tree density and increase tree size at maturity. Jim Long and John Shaw in the Forest Resources Dept. at USU are currently developing stand management plans for the Targhee NF that reflect the need to manage for a variety of species and concerns and project treatments at early seral stages far into the future. Since northern goshawk populations in Utah make extensive use of lodgepole forests, Shaw and Long's research would be a valuable addition to this document.	11000	7300
209	046	Commenter found fault with Graham document in the following areas: population monitoring data is ignored; habitat models are erroneous and largely irrelevant to goshawks; no baseline is established for judging the HRV in seral species, no evidence is provided for the value of converting late to early seral forests; winter prey base and habitat correlates should be analyzed; recommendations are unsupported by goshawk or forest ecology; references should be limited as much as possible to primary studies.	11000	
210	046	The proposed action is inconsistent with the purpose and need. The statement of purpose and need asserts that current direction confers great latitude in management preventing assurance of future goshawk habitat and populations. The Habitat Conservation Strategy concluded the consistency in management of habitat is key to providing a reasonable probability of goshawk persistence. The new management direction proposed by the HCS and the Forest Plan amendments, however, is so full of loopholes it does not assure consistency in management. For example, the proposed action requires that 40% of the conifer landscape within the foraging area and 30% of the aspen landscape be managed for mature forest conditions <i>unless</i> a site specific Biological Evaluation concludes not doing so is consistent with the intent of the Conservation Strategy. No explanation of how this could be consistent with intent. Canopy cover in VSS 4-6 stands should be $\geq 40\%$ <i>unless</i> this is outside the historic range of variability. No explanation of how to determine the HRV on a site specific basis. Establish protected nest stands for all nests <i>unless</i> they are historic and currently unoccupied. No logging in nest stands <i>except</i> during the non-nesting season. No human activity within nest stand during breeding season <i>except</i> when authorized by a biological evaluation. Maintain 50% canopy cover within post fledgling area VSS 4-5 stands <i>unless</i> not with the HRV.	7300	
211	046	Since the loopholes pertain to essentially all management activities within all goshawk use zones (nest, post-fledgling, foraging), the proposed action does not guarantee any consistency at the site specific level. The only consistency will be employment of the same loopholes. Such loopholes were not permitted in the Southwest, why are they permitted here?	7300	
212	046	The Proposed Action is inconsistent with the project goals. According to Encl. 4, native processes, including fire regimes should return to their historic range of variation. Yet the proposed action does not direct or require that natural fire frequencies be restored to ponderosa pine or other frequent burning systems. Indeed the current road system, grazing management, and fire suppression policy will not allow it. Nor is a frequent fire regime compatible with the proposed action's requirements for a large proportion of early seral stages. The FS institute fire suppression precisely because it destroyed the early seral stages required by regulated forestry (and the proposed action).	7300	1300
213	046	No explanation is given as to how the desired seral stage proportions were arrived at. The proportion of seral stages and species in each vegetation class appear to be completely arbitrary. Despite the admonition to return Forests to their historic range of variability, no evidence is presented to indicate that the desired condition is within the range of historic variability. To the contrary, it appears the result of modern requirements for a regulated forest.	7300	11000 6000

C#	L#	COMMENT	CAT 1	CAT 2
214	046	The Proposed Action is inconsistent with the best available scientific information. With apparent disregard for the extensive critiques by federal, state, forest service, independent and environmental biologists, the Habitat Conservation Strategy and Agreement simply dub Reynolds et al as the best available science. The best science is not something that can be crowned like a knight. If the FS believes that Reynolds et al is the best available science regardless of the critiques and the dozens of studies which were published after it, the FS is legally required to take hard look at the critiques and respond to them in substantive manner. Simply declaring it to be adequate is illegal in the context of NEPA. Thus Far, the HCA, HCS, the NEPA scoping documents and Graham et al do not even acknowledge the existence of these critiques.	7100	10000 11000
215	046	The monitoring plan is inadequate. The requirement to randomly sample territories will prevent the FS from obtaining consistent, long-term data on individual nest sites. There is no way to establish occupancy and productivity trends unless large sets of individual territories are consistently sampled.	7100	8600
216	046	There is also no way to correlate randomly sampled territories with land management practices. The FS should instead establish long-term monitoring efforts at control and experimental plats, as defined by management activities such as logging, recreational encroachment, grazing, etc.	7100	8600
217	046	An EIS is required. A management plan affecting all forest types in all National Forests in Utah will have a significant effect on the environment. This effect will likely be negative.	10000	
218	047	Every researcher who has studied the goshawk in western states has found densities that are inversely associated to how much of its habitat has been logged.	11000	2400 1100
219	047	For many years, the goshawk has been identified in forest management plans as an indicator species, that is a key species the presence or absence of which defines the health and abundance of a particular forest type. For this goshawk, this means mature and old growth forests characterized by old trees, closed canopies, and a complex understory. Because of these habitat requirements, a successful Habitat Conservation Plan should profoundly and fundamentally change the management direction on the national forests of Utah.	2400	8400 10000
220	047	We are concerned that there may be an attempt by some forest managers to justify timber harvesting in the name of goshawk habitat improvement. We hope and trust that this is not the case. For years we have endured a litany of reasons that timber was being cut... we hope that improving goshawk habitat is not just another ploy to tip the balance in favor of the timber programs on our Utah national forests.	7300	1100
221	047	To preserve the habitat for the goshawk and its prey, emphasis will have to change from large clearcuts and road construction to management with prescribed fire and in a few cases perhaps smaller scale thinning of stands.	7300	1100
222	047	It will mean a shift from industrial logging with slash piles and soil disruption/compaction to small-scale very low-impact timber operations on much of the national forest lands in Utah.	7300	1100
223	047	The new proposed management recommendations ignore some of the recommendations of early General Technical Report RM-217 (Management Recommendations for the Northern Goshawk in the Southwestern United States). (It should be noted that the recommendations of the Utah plan are a watered-down version of RM-217, which is a watered-down version of the recommendations of other researchers who felt that RM-217 didn't go far enough in protecting and restoring goshawk populations. In this light, the recommendations of RM-217 should be the absolute minimum for a Habitat Conservation Strategy.	7100	
224	047	Nesting areas are of vital importance to goshawk breeding success. RM-217 holds that No adverse management activities should occur at any time in suitable nest areas. The proposed guidelines for Utah forests would only prohibit forest vegetative manipulation within active nest areas during the active nesting period (between March 1 and September 30). This is not adequate protection for goshawk nest areas.	7300	2400
225	047	The proposed HCS would restrict management activities and permitted human use in active nest areas during the active nesting period unless it is determined that the disturbance is not likely to result in nest abandonment. If the disturbance is likely to result in abandonment a biological evaluation would decide if the proposed action (and we support the resulting nest abandonment) is consistent with the intent of the Conservation Strategy and Agreement for Management of the Norther Goshawk in Utah. (Question: How could an action resulting in nest abandonment be consistent with any conservation strategy for the goshawk in Utah?)	7300	2400

C#	L#	COMMENT	CAT 1	CAT 2
226	047	Please note that RM-217 recommendations would protect even suitable (but unoccupied) nest areas at all times. The new recommendations wouldn't even ensure the safety of active nest areas during the active nesting period. Why weren't the more extensive restrictions used in the new management proposal?	7300	2400
227	047	Your description of guidelines for the foraging areas of goshawk home ranges is rather inadequate and vague. We expect to see detailed and defensible guidelines in a new draft document. This is important. An inadequate description of guidelines in a new management proposal describing Desired Future Conditions for All Forest Types is absolutely necessary.	7300	2400
228	047	In a very real sense, foraging areas are just as important as nest areas or PFAs because they provide the prey base for adult goshawks and their young before they fledge. Having to travel far from the nest to find prey is a high stress for a nesting pair of birds. The real difficulty for the FS lies in protecting these last, larger areas, because it will mean a real change in the way it does business. Why? Because these are also the areas that figure prominently in the prospective timber program of each national forest.	2400	1100
229	047	RM-217 holds that in each goshawk home range (meaning all of the home range: Active, suitable and Replacement Nest Areas; Post-Fledgling Areas; Foraging Area) road densities should be managed at the lowest possible level. As described in your scoping document, the new recommendations fail to make this commitment, saying only that where timber harvest is prescribed, (the Forest Service will) plan a transportation system to minimize disturbance. The HCS recommendations fail to echo those of the earlier, landmark report. RM-217 recommended that where timber harvesting has been prescribed to achieve desired forest condition, us(ing) small permanent skid trails in lieu of roads is preferred. We hope to see this emphasis in your draft document.	7100	4000 1100
230	047	Regarding forest openings, the new management recommendations are adequately restrictive, calling for maximum openings in Ponderosa pine and mixed conifer forests of 2 acres and spruce/fir of 1 acre. But, inexplicably, the HCS recommendations call for following current management direction for aspen and lodgepole pine in goshawk home ranges. Current management direction includes multi-acre treatments of these areas which may be inconsistent with the management objective of improving suitable goshawk habitat and habitat for prey species in goshawk home ranges. Where applicable, aspen and lodgepole forests should be management for small openings as well. Large openings such as clearcuts and young, dense forest appear to have little value as habitat for goshawks or their prey species.	7100	2400 1100
231	047	In general, most prey species prefer the older age classes in forest stands and whereas the northern goshawk will hunt in many different forest types and conditions, it prefers mature and old-growth, closed canopy forests with big trees and small openings interspersed within the stands of its home range. Larger trees make more cones and seeds for prey species, and better hunting perches. For the most part, forests in the older age classes are relatively open (40-60% canopy cover) with increased sunlight and moisture reaching the forest floor, supporting well-developed herbaceous and shrubby understories. It is important that your drafts document has a thorough discussion of the importance of forest canopy and the means to attain this important part of goshawk home range.	6800	
232	047	Goshawk prey species depend heavily on fungi and fungi are best produced in conifer stands with canopy cover greater than 60%. We note that the role of fungi and mistletoe in dead and diseased trees in maintaining adequate populations of small mammals is not discussed. We trust this will get adequate description in the draft document. In this respect, even diseased trees aren't all bad. Dwarf mistletoe-infected trees provide good nesting and feeding sites for many vertebrates. Large quaking aspen (common in decadent, old stands) provide feeding and cavity nests that help maintain high densities of large woodpeckers, a favorite goshawk prey species. Large downed trees and dead standing snags provide a myriad of unique hiding, feeding, denning and nesting sites for all selected goshawk prey species. RM-217 notes that goshawk foraging habitat will have sustainable and abundant prey when the majority of forests are in the older age classes.	6000	
233	047	Roadless areas of the national forests produce most of this habitat and that preserving these areas as roadless is important for the goshawk and for many other species. Seen in this light, preserving goshawk habitat is fully consistent with the current Forest Service moratorium on road construction in the national forests.	8800	10100

C#	L#	COMMENT	CAT 1	CAT 2
234	047	In each national forest, monitoring of the implementation of the HCS should compare areas in which some, few areas are manipulated to enhance goshawk habitat with other areas where home ranges are undisturbed by treatments. Undisturbed areas selected for study and monitoring should be outside as well as within designated wilderness and Research Natural Areas.	7100	8600
235	047	We are concerned that the ponderosa forest of the Flaming Gorge National Recreational Area was left out of the lands where the HCS management prescription would apply. This type of forest would seem to be ideal goshawk habitat and the ponderosa forests of that area most certainly should be included in the HCS. Please include Flaming Gorge NRA in your draft document.	7400	7300
236	048	The need for goshawk habitat is an excellent reason to reduce logging and roads in national forests. The percentage of old growth forests is alarmingly low. Let's keep the few remaining giants we have.	710000	6300 2400 1100 4000
237	048	Let nature take its course and allow natural fires to thin trees. The Forest Service policy of controlled burning has not been as successful as had been predicted. Why not try the older, more natural method.	1300	
238	048	Thank you for devoting time to protect a gorgeous bird and a true symbol of the wild.	9000	
239	049	Extremely disappointed with the Intermountain Regions's proposal for conservation of the northern goshawk and its prey and will not support its implementation in current format.	9000	
240A	049	Despite the FS's legal mandate to ensure the viability of the goshawk, there are few, if any, examples of forest management in Utah that are based on the habitat requirements of the species. Recommend a slow, conservative approach toward any further destruction of goshawk habitat. Adequate management of goshawk populations depends on thorough understanding of the broad habitat usage patterns of individuals.	7100	2400
240	049	Logging and road building are destroying and fragmenting goshawk and other old growth indicator habitat.	2400	1100 4000
240B	049	It is noteworthy that many goshawk studies that have provided important information about the goshawk's life history have occurred in habitats that have already been disturbed. Thus the data on which management decisions are currently based is incomplete and does not adequately represent the habitat required to ensue healthy viable goshawk populations. In our opinion, the proposed management direction will continue this trend.	11000	7300
241	049	Adequate goshawk habitat standards would include two broad issues. The first is the need to determine habitat needs based on total home range usage rather than just nesting habitat. The second involves the impacts of continued habitat fragmentation on the overall ecological quality of the goshawk's home range.	2400	11000
242	049	Population monitoring projects are needed as a start toward evaluating trends over time. The data being gathered in Region 4 is only occurrence data and is lacking trend analysis or reproductive success information. There is little baseline information on goshawk populations in Utah and the nest sites that have been surveyed have largely been associated with timber sales.	11000	
243	049	Radio telemetry studies are also needed to get data on home range size and usage by Utah's goshawk populations in disturbed as well as intact habitats. These studies would focus on foraging behavior during both the nesting and winter seasons.	11000	8600
244	049	There is little existing published data addressing which habitat types are most frequently used by foraging goshawks. Therefore, it is impossible to accurately judge the pattern of the overall forest mosaic across the goshawk's home range. This mosaic is what determines whether the foraging habitat will adequately provide the energy needed by the goshawk. Typically nesting and foraging territories have been defined by vegetation characteristics. Future research should focus on actual bird usage patterns. The proposed management direction fails to do so, possibly because the data has not been collected.	7300	2400 11000
245	049	Presently little is known about how dispersed juvenile goshawks select new habitats. Current management strategies are designed to protect those territories that are already occupied. Without this knowledge, it is difficult at best to ensure long term genetic viability of goshawk populations.	7300	11000 8600

C#	L#	COMMENT	CAT 1	CAT 2
246	049	Currently, nest buffer strategies are being implemented to ensure both continued logging and viable goshawk populations. However, there is little data quantifying their success because the effectiveness of any strategies intended to mitigate the impacts of logging to goshawks has gone completely unmonitored. The management direction proposed does nothing to assure protection of future goshawk habitats or a proactive monitoring program.	7300	11000 8600
247	049	Crocker-Bedford data suggests quite clearly that even large nest buffers are not effective. Also, Crocker-Bedford suggests that the failure of nest buffers may be related to the effect of forest fragmentation on prey densities. Changes in canopy cover and the species composition of the forest understory may effect both the availability of prey and cycles of key goshawk prey species is an important element in designing management strategies and one that is currently lacking in Region 4. This data should have been compiled prior to the development of the proposed management direction.	7300	11000
248	049	In light of the limited knowledge regarding goshawk behavior patterns and habitat utilization, caution in fragmenting the last intact portions of its habitat is warranted.	7100	11000 2400
249	049	There is a need to protect remaining tracts of large intact old growth forest habitat by implicating forest fragmentation as a cause of declining reproduction. In order to ensure continued viable populations of goshawk in Utah, areas of prime foraging habitat must surround nest sites. Crocker-Bedford recommended that 2,000-5,000 A tracts near a territory's nest should be fully mature at any given time. This figure is for a habitat known for unusually high goshawk nesting densities which may be related to the quality of overall habitat. Thus, it would seem prudent to ensure that at least 5,000 A be provided as foraging habitat.	7100	6800
250	049	Certain characteristics must be maintained within this 5,000 A of forest. The overstory canopy should provide 75-80% cover. Tree density and size should be determined based on the actual habitat the goshawk pair is nesting in. However, the protected forests need to contain a high percentage of the largest trees in that particular habitat. Nests, including alternate ones, should be located at the center of this area in order to protect them from the effects of the forest edge including competition with open-forest raptors.	7100	6800
251	049	Attention should be paid to the overall structure of the large stands intended to serve as foraging habitat. They need an open understory as well as large trees and snags to serve as the perches or plucking posts from which goshawks hunt. One study recommends that 4 snags per acre be maintained near goshawk nest sites.	7100	6600
252	049	A large expanse of coniferous old growth forest will probably contain a variety of different successional stages and forest components utilized by the goshawk. Within a large unharvested tract, it seems more likely that this diversity of micro-habitats will be maintained. Given that the actual habitat usage patterns of a goshawk are largely unknown in Utah, management strategies should aim to preserve all of the pieces of this mosaic that still remain. Priority should be given to protecting the remaining roadless tracts of mature forest. These large areas represent a potential opportunity to ensure goshawk habitat before it is altered and key components are lost.	7100	8800
253	049	Crocker-Bedford recommends the complete avoidance of timber harvesting throughout the entire foraging range of the goshawk (>5,000 acres) until more is known about managing timber activities in a manner compatible with goshawks. Even outside of the nesting season, logging would be precluded in this area. This conservative approach is particularly warranted in Utah since little specific information about goshawk habitat usage is available. Even strategies such as understory thinning should be avoided in these area until more is known about their cumulative impacts on the goshawk or its prey.	2400	11000
254	049	Beyond this 5,000 A tract of forest, it is important to manage the land so as not to create habitat that is completely inhospitable to the goshawk. Crocker-Bedford recommends that another tract of land, contiguous to the first 5,000 A tract be maintained as marginal foraging habitat. This area should also be 5,000 A which is the upper end of the 2500-5000 A recommended.	7100	2400
255	049	Despite the Forest Service's mandate to maintain viable populations of indicator species and to estimate the effects of proposed actions on these species, this important groundwork is routinely overlooked. Surveys for goshawk nesting territories need to occur before the timber sale process begins. Without adequate knowledge of where these territories are the Forest Service cannot proactively manage these sales.	7300	2400

C#	L#	COMMENT	CAT 1	CAT 2
256	049	Assuming that some forms of timber harvesting may be compatible with the continued reproductive success of goshawks, it is impossible to provide adequate habitat for these birds without prior knowledge of the location of their territories. These surveys need to be made during the nesting or post-fledgling period and should be conducted for minimum of 2 consecutive years so that periodically unsuccessful territories will not be missed. Thorough surveys are also recommended in undisturbed areas in order to establish a baseline of information regarding prey use, nesting densities and habitat use.	7300	2400
257	049	While the lack of quantitative data should not provide an excuse to maintain current forestry practices, a more complete understanding of the goshawk's interactions with its habitat is needed to adequately ensure the necessary amount and complexity of territory. It is especially important that any management strategies be monitored for effectiveness.	8600	2400 1000
258	049	Current management practices are creating marginal territories that are fragmented and declining in overall quality. Habitat that is presently marginal does not allow for future change either through natural forces like fire or through continued human manipulation. The proposed management direction for goshawks and their prey will continue this trend and therefore is unacceptable. Recommend the strategy be reevaluated and rewritten to demonstrate a credible program that will ensure goshawk viability. This new document should be put out for peer review and public comment.	7300	
259	049	All of the comments and recommendations mentioned above [#'s 240-258] should be included in proposed management direction for goshawks.	8500	
260	049	Specifically object to the arbitrary and vague recommendations in the proposal. We are left with the impression the FS is simply more interested in logging goshawk habitat than ensuring its effectiveness for population viability.	9000	
261	049	The document includes 16 guidelines for goshawk management and only 2 standards. The FS has consistently not implemented Forest Plan guidelines in general because it doesn't have to. Guidelines are the loophole that allow management activities to proceed unhindered. It's unfortunate that the FS now considers standards to be a constraint on management practices. Standards are legitimate requirements to be followed in the best interest of natural resource, and should not be viewed as constraints to timber harvest. The two standards listed are contradicted by numerous guidelines so there is no assurance that they would actually be effective.	7300	
262	049	The main goals state "maintain or restore"... if the Forest Service simply maintains the status quo, how will that respond to the suspected downward trend in goshawk habitat and/or populations?	7600	7300
263	049	In the EA, we request documentation on how the proposed strategy represents the best scientific information on the northern goshawk and its use of habitat in the State of Utah. Specifically, on implementation of recommendations, snags, down material, and old growth composition.	7300	2400 6000
264	049	Composition - Object to the use of any non-native species in management activities. The document concedes that native plant species are preferred and that non-native species have the potential to cause systems to move outside of HRV.	7100	
265	049	Structure - Object to the loophole is the second goal that would allow variation from the guideline if the action was assessed through the BE process and the BE concluded that the action is consistent with the intent of the conservation strategy. If the action was consistent with the intent of the conservation strategy, you wouldn't need a variation from the recommendations.	7300	
266	049	Monitoring - The proposed monitoring requirements will be ineffective. We disagree with all of the variation which would cause further evaluation and/or change in management direction.	7300	8600
267	049	Those for snag and down wood material are arbitrary.	7300	8600
268	049	For habitat connectivity and diversity, no time frame is stated for the landscape assessment which the change is management direction would be based on.	7300	8600
269	049	The territory occupancy requires a consistent 20% decline over a 3-year period which, if occurred, would severely threaten population viability and would be reacting to a situation that could have been prevented proactively. The intent of monitoring should be proactive not to document failure and then react to the situation.	7300	8600
270	049	We sincerely hope the FS will reexamine its proposal and address all of the deficiencies contained therein.	8500	

C#	L#	COMMENT	CAT 1	CAT 2
271	050	Judging from the scoping document, the approach to goshawk management appears to be more enlightened than previously endorsed; perhaps this is a reflection of gaining a more comprehensive understanding of the bird.	9000	
272	050	How is the ongoing spruce beetle epidemic in central and southern Utah and the lack of proactive silvicultural treatment going to effect the potential management of goshawks in this habitat type?	1400	1000
273	050	The scoping document alludes to using vegetative management to benefit the goshawk. Is this real or just talk? If I remember correctly, large portions of national forest lands (and other ownerships) are outside properly functioning condition and lack a range of seral stages which you stated are important to long term diversity and habitat maintenance. Active vegetative management is needed to meet your goals.	6000	
274	050	Timber harvest appears compatible with goshawk management via creation of more habitat diversity and emulating desired habitat conditions in some timber types. I think we need to work together on something of this nature. The value of the timber can help pay for the projects while providing useful to society.	1100	2400
275	050	Does the Graham Assessment include research on the goshawk in managed forest habitats.	11000	2400
275A	050	I know there was an ongoing study in Washington/Oregon on goshawk response to different types and intensities. If you are interested I can track it down for you.	11000	
276	050	What is the overall goal of this project - increase goshawk populations, maintain current populations, or is there a lesser population level that still maintains a viable population of the birds?	7300	
277	050	Will the bird's needs be deemed the most important use of the land or will habitat diversity that benefits other resources in addition to the goshawk.	6000	
278	051	For the most part, the proposal to develop a management direction that will maintain or restore habitat for the northern goshawk on Utah's national forests is good - I just hope it doesn't turn into something that some foresters could interpret as making it easier to cut timber.	1100	2400
279	051	The goshawk is dependent upon old growth forests for nesting and the rearing of their young and it requires large territories of diverse ecologically integral forest types which must be isolated from human activity. Goshawks have never prospered in areas where timber is harvested, definitely not in clear-cuts, but not quite as bad in selective-cut areas. Natural fires are essential in maintaining these integral and diverse forests.	2400	1000
280	051	It is my opinion that the best management strategy is to allow ecological processes to work including natural fires. In essence, goshawks don't need roads, saws, or logging.	1300	4000 2400 1100
281	052	I am not sure that title accurately conveys the broad implication of this project and will therefore raise concerns which go beyond the goshawk itself. The goshawk is merely a symptom of the issue.	6000	
282	052	Restricting management activities and permitted human use on 180 A for every nest site plus managing an additional 420 A for every site to provide home range habitat for the goshawk is no small thing. Are the drastic measures set forth in this project really justified by a species which, according to USFWS studies in your documents, is thriving and doing well despite several decades of traditional forest use under forest supervision?	7300	2400
283	052	I am concerned about the change in direction that is occurring in land use policies. That which was once considered good is now characterized as evil. Where once the surpluses in nature were harvested wisely for the benefit and use of man, now there is more of a mind set to manage them by allowing them to be lost to the natural forces of nature. Make no mistake about it. Nature will deal with any surpluses which are not beneficially utilized and usually affect more than just the surpluses in the process. Is it better to allow these resources to be wasted than to allow their management use by this villain we call man?	9000	5000 10000
284	052	A great assault is being launched against even having motorized access to public land. Is access to be granted only to the physically fit in the prime of life? Even the most adamant preservationist will one day have physical limitations.	4000	9000
285	053	It seems to me clearcutting trees may be a problem. I think the hawks are doing well at the moment but I consider the study a good thing.	1100	2400
286	054	Page 4(g) states the activities for which a written permit is issued would be restricted. I would guess this would refer to wilderness permits. My understanding was that very few of these were issued any more.	7400	

C#	L#	COMMENT	CAT 1	CAT 2
287	054	It would be helpful to enclose a picture of drawing of a goshawk. Most people have an easier time caring about something they can identify with. Most would probably feel they had at one time or another seen one of those birds. They may have never spotted one or may never spot one. Most people do find it exciting to see, spot, track from afar or with binoculars various animals. Often eventful family scouting or other outings are remembered by you remembering the trip that we saw the ... . When we can identify with the public is when we win because we endear them to our cause.	9000	
288	054	Is seral stage the same as or something similar to primary, secondary, etc., succession?	6000	
289	054	Which of these maps shows the 5 Mile Pass National Park which is directly west of Utah Lake near or SW of Cedar Fork Utah? The signs for the OHV are down in this area as sell as the brown park signs.	8000	
290	055	The Forest Service is to be commended for initiating a proposal to develop management direction that will help maintain or restore northern goshawk habitat on Utah's national forests, for this is the primary place where goshawks reside.	9000	
292	055	There are four very important factors that should be considered - Goshawks are dependent upon old growth forests for nesting and rearing their young.	2400	
293	055	There are four very important factors that should be considered - Goshawks require large territories which are ecologically diverse and integral. These forests must be far removed from human activity.	2400	
294	055	There are four very important factors that should be considered -- Goshawks can not prosper in forests which are subjected to clearcuts or selective harvesting.	2400	1100
295	055	There are four very important factors that should be considered - Natural fires are essential in maintaining integral and diverse forests, upon which the goshawks is so dependent for its survival.	2400	1300 6000
296	055	The best management strategy for goshawk is to allow the natural processes to work without human interference, resembling as close as possible the way in which these forces were working before we began to intervene.	7100	
297	056	I am in favor of much of the communication I read regarding the northern goshawk team's recommendations for habitat.	9000	
298	056	I am concerned about inconsistencies within the forest service plans, specifically the plan to harvest the East Trout Slope Timber.	7500	
299	056	I urge you to allow natural processes to work.	7100	
300	056	... bring in the support of the other forest supervisors.	8000	
301	056	It is only as a united ecosystem that the forests can serve as corridors for birds and mammals.	6400	
302	057	The issue is of deep consequence. The attempt to protect the species while avoiding listing it under the ESA is a positive action even though some, unfortunately, will see it in a negative light as an effort to protect goshawk on paper only. While we are hopeful of the former we fully understand the skepticism of the latter. In fact I raised this concern at the SLC open house by noting that it appears that the management guidelines are more along the lines of timber sale prescriptions than goshawk habitat guidelines. In other words, it appears as though these guidelines were built to allow timber sales as long as these particular compositional structures are met. The assumption seems to be the old one -- timber first, goshawk second, in that timber sales are still a dominant part of the Forest Service culture and now can be justified and pursued in the name of goshawk as long as they meet certain guidelines. There is another way to look at this issue by simply noting goshawk comes first and timber sales which alter goshawk habitat will not be placed on that landscape.	1100	2400
303	057	These management guidelines present a daunting implementation/monitoring dilemma for the Forest Service given the complexity of the proposal and the often-cited, unfortunately, reduction in person power and dollars. As soon as the FS says we can't monitor this the way we want right now the whole effort falls apart.	8200	8600

C#	L#	COMMENT	CAT 1	CAT 2
304	057	The first structural goal notes the imperative standard of maintaining large, intact, connecting, mature and old growth forests on the scale of tens to hundreds of thousands of acres. The next goal talks about maintaining snags over each treated 100 acres. The next goal talks of retaining down logs and debris over each treated 10 acres. Canopy closure becomes a project level goal. Obviously these are timber sale prescriptions and more importantly the confusion that will be associated with the cumulateness of these goals will be profound. If every project level timber sale meets the standards noted it is clear at the larger landscape goshawk habitat continues to be negatively affected because the scale of measurements is so dramatically different.	6000	
305	057	We fear the Forest Service will jump at the context of removing old forest patches in each timber sale project because goshawks need a diverse forest habitat with early seral forests. That logic has been used in the past and it is clearly incorrect logic -- the scale matters in this context.	6000	
306	057	The fact that proposed management direction will not be applied in designated wildernesses, Research Natural Areas, and the like is another indicator of timber-sale driven goshawk management. How ironic that it has somehow been determined that wildernesses like the Uintas, Pine Valley Mountains, and even some of the Wasatch Front wildernesses are outside of the analysis. The irony is over the years I've rarely seen goshawks within a timber sale project area, never seen an active nest in a timber sale but seen goshawks and nests frequently in the High Uintas, Mt. Naomi, Mt. Olympus and the Pine Valley Mountains and in large undeveloped landscapes such as the Casto Bluff area, Beehive Peak, the Pahvants, the western end of the Uintas, upper Price River, etc. It is in wilderness where the natural ecological processes define goshawk existence. This decision is questionable.	7400	
307	057	It is also interesting and ironic to note that ski resorts on the Wasatch Front appear (map scales are difficult to interpret) to be listed as the forest lands to be managed for goshawk even through the scoping letter notes lands under long term special use permits or specifically managed for heavy recreation (or with mixed ownership patterns) are to be excluded from the management direction. Indeed the irony is that these landscapes are not amenable to goshawk but wilderness lands are.	7400	
308	057	Having read Graham et al it is not entirely clear where some of these specific management guidelines came from. If anything, Graham notes that timber management represents a threat to goshawk. Clearly timber harvesting severely fragments goshawk habitat, both nesting and predation habitat. There is a significant disconnect between timber harvesting with its attendant roads and direct human intervention and the desired structure and composition of forests suitable for goshawk. Inherent ecological processes of wind, fire, insects, pathogens simply don't lay the grid of human intrusion on a fragile landscape. Goshawk has evolved a remarkable dance, if you will, with those drivers of diversity, not with roads and saws.	6000	1100
309	057	It is important to note the value of large roadless landscapes in this management assessment as it is these areas that offer the inherent natural processes that are obviously crucial to goshawk. This effort needs to analyze the health of goshawk populations in roaded and unroaded landscapes, particularly in the context of cumulative effects and the value of these connected landscapes.	8800	2400
310	057	The Graham paper clearly notes timber sales have degraded goshawk habitat and are very likely to continue to create significant problems. The scoping document down plays this	1100	2400
310A	057	The scoping document down plays this and the issues also raised in Graham (and others) dealing with grazing. The latter in combination with fire exclusion have likely impacted aspen in specific locales which have added to the severity of goshawk habitat loss in that vegetation type. Thus grazing issues must be dealt with in a significant manner. While open understories are important to goshawk predation, this does not, as you well know suggest degraded vegetation conditions resulting from intense domestic grazing and fire exclusion to represent suitable conditions for goshawk, particularly maintenance of the prey base.	7100	5300 1300 2400

C#	L#	COMMENT	CAT 1	CAT 2
311	057	We have to admit being a bit confused about the supplemental Information Report and Determination. In all the years I've worked on forest planning issues I've never seen this process and am now forced to wonder why? Nevertheless, the 2 SIRs that I picked up were provocative. I trust the others were very similar in context and differed in content only to the extent that each forest plan differed. In other works I suspect the direction of each SIR was generally the same. At least in the 2 (Wasatch and Ashley) that I picked up (as I recall they were the only 2 that had more than one copy available) noted that although an amendment had to be produced for the forest plan, there were no expected changes in plan outcomes/products/resource. If that is the case then why this amendment? The SIR and scoping letter dance all over this issue. On the one hand there is a need for a sweeping change in goshawk management as exhibited by a massive effort to bring all Utah forests into compliance, utilizing a forest plan amendment process which is going on at precisely this time. At least 3 forests are already revising their forest plans and only a year ahead of the other 3. There is an urgency in this kind of planning effort. Yet on the other hand the message is, at least through the 2 SIRs that I picked up (and I apologize if my assumptions about the other 4 are incorrect but I would be surprised if they are) only words and not management actions/projects will be altered in the plan, at least in the context of outputs. But of course it is outputs by way of projects that threaten goshawk habitat.	8400	5000
312	057	This disfunction at the procedural level is meaningful and will need to be thoroughly explained. It also leads to a disconnection at the management level, particularly with respect to connectivity of habitats which does not assume any meaningful alterations in forest structure, particularly timber sales or anthropogenic vegetation management. What the Graham paper and other goshawk literature suggests is that old growth forests are the limiting factor to goshawks. Fires, pathogens, wind and storm are essential disturbance processes to maintain a natural patch within each particular landscape that is important for goshawk. Clearcutting, even aged management, intense grazing, and other activities that disrupt the normal inherent predation and dispersal. Clearly an alternative of protecting connected and large roadless areas across all of Utah's forests would be the wisest and most visionary management tactic by the Forest Service particularly in conjunction with an aggressive effort at bring grazing capacities into compliance with goshawk and other ecological standards instead of satisfying on only the politics of grazing.	7100	8800 5000
313	057	It is equally obvious that already developed landscapes, particularly timber sale areas, need to be rehabilitated to meet the standards needed to assure these landscapes do not become goshawk sinks.	6000	2400
314	057	After reviewing the Graham paper and looking at the maps of goshawk habitat and optimal habitat and after discussing with biologists, we have a concern as to why the Middle Fork and upper Main Fork of the Weber River and many of the North and South Slope aspen, lodgepole pine and spruce forests were not included as optimum habitat. This also pertains, in part, to the issue of wilderness not being part of the management direction.	2400	7400
315	057	I have seen numerous goshawk nests, active nests, on both the Upper Weber River drainages noted above and throughout the undeveloped and wilderness portions of the Uintas, particularly in elevations of 8800-9800 feet where aspen and lodgepole pine and even spruce intermingle and where lodgepole and spruce become part of the landscape matrix.	2400	7400
413	057a	How will continuous forests outside of Utah be considered?	7300	
316	058	The biologists inform us that the goshawk is dependent upon (1) old growth forests for nesting and rearing of young; (2) large territories of diverse forest; and (3) isolation from human activity.	2400	
317	058	The goals for forest diversity seem to be well defined in Enclosure 4 but I am concerned that there are no goals for establishing the vegetative needs of goshawk prey. Since most of Logan Canyon is under grazing allotments and much of the understory is bare ground, what steps will be taken to reverse this situation? Should you not be managing habitat for the prey species as well as determine whether there are adequate prey species for the goshawk to survive.	7100	5300
318	058	How will you manage for human activity in sensitive goshawk habitat? Every year there is more pressure on the forest from motorized recreational vehicles. It would seem reasonable to eliminate human activity in sensitive parts of the forest.	7300	3100 2400 4200

C#	L#	COMMENT	CAT 1	CAT 2
319	059	Comments address air quality issues related to the use of wildland and prescribed fire. We appreciate the need to use prescribed fire as a forest health tool but this must be done in conjunction with protecting human health and welfare. Request that any wildland and prescribed fires be conducted consistent with the Federal Clean Air Act and any associated federal, state, and local policies and regulations.	12000	1300
320	060	I urge that all northern goshawk and prey habitats on the National Forest System in Utah be fully and permanently preserved and managed as Sanctuary areas to assure all old-growth as fully-protected areas.	7100	
321	060	Establishment of high quality habitat.	7300	2400
322	060	Promote large well distributed trees.	7300	6000
323	060	Create habitats for prey.	7300	2400
324	060	With substantial goshawk nesting habitats provided and fully protected.	7300	2400
325	060	Eliminate all mining, cattle grazing, logging and roads. Along with the obliteration of roads.	7100	5000
326	060	With very large areas available for the goshawk that are diverse and varied.	7300	6000
327	060	Preserve all roadless areas.	7100	8800
328	060	Establish and designate the National Forest System in Utah as National Preserve and Wilderness with the National Forest System in Utah to include 8,921,000 A in wilderness.	7100	
329	061	In general, the Management Recommendations for the Northern Goshawk (MRNG) which has been adopted by R3 fails to pass the test of scientific rigor and is unsubstantiated as a method for maintaining goshawk viability. Unfortunately the Utah proposed directions appears to emulate the MRNG closely and thus will not secure the viability of the northern goshawk.	7100	11000 2400
330	061	One of the most glaring deficiencies in the Utah proposed direction is it's reliance upon single territories and/or nests 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.	7300	2400 11000
331	061	The Utah proposed direction will fail 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.	7300	2400 11000 1100
332	061	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, northern goshawks have evolved physical characteristics (morphology) that enable them to hunt most efficiently in relatively mature, dense forest structures. The open forest conditions that are discussed in the Utah proposed direction are likely to create forest structural characteristics which will not enable goshawks to use their morphological adaptations most efficiently.	7100	7300 6800
333	061	The Utah proposed direction would favor canopy closure far below the 60%+ level preferred by the goshawk, including many acres of small patch clearcuts up to 2 A with no direction for aspen which can be the goshawk's preferred habitat. 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 nesting areas once the forest canopy has been opened: <i>Competition can manifest itself through interspecific aggression, direct predation on goshawks (especially nestlings) as well as through competition for nest sites and prey. Therefore, creating open forest conditions in goshawk foraging habitat ... could actually result in a competitive disadvantage for the goshawk (AGFD).</i>	7100	7300 6800 6100 1100 2400
334	061	Other indirect effects to the goshawk will include reductions in prey base, especially those prey dependent upon dense clumps of forest. Mycorrhizal fungi communities, which are the most important food sources for the goshawk's small mammal prey, will be adversely impacted by open forest conditions. Mycorrhizal fungi spreads only in stands with canopy closure in high, most often above 60%.	7100	6800 2400 7300

C#	L#	COMMENT	CAT 1	CAT 2
335	061	Managing for open forest conditions also fails to account for changes in the prey base caused 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 Williamson's sapsucker. These and other 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 Dept.	7100	2400 11000 6800
336	061	Logging is directly detrimental to the goshawk, even if such logging involves only light touch thinning. In a peer-reviewed article first published by the Wildlife Society, one of the Forest Service's leading goshawk researchers concluded that: Even with nest buffers, recorded reoccupancy (of goshawk nest sites) dropped by 80% and recorded nestling production dropped by 94% following logging. The true decreases were greater. Other raptors replaced goshawks in most logged territories. (Crocker-Bedford's) Study ... examined protected nest sites that ranged in size from 1.2-200 hectares. Timber harvest around the nest sites removed only 1/3 of the trees.	2400	1100
337	061	The Utah proposed direction seems to advocate "forest management" i.e. logging as a means of maintaining or restoring northern goshawk habitat when the emphasis should be restoration through the reintroduction and maintenance of natural disturbance. Such direction as "each seral stage should contain a strong representation of early seral trees species" 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. There is no mention in the Utah proposed direction of natural disturbance or fire as an appropriate and preferred management tool. 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.	7300	2400 1100 1300
338	061	In regards to snag and down log densities, the Utah proposed direction prescribes densities much too low to realistically provide adequate habitat for either the goshawk or its prey species. Bull found natural or recommended snag numbers (>10 inches 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 occur in 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.	7100	6600 6700 11000
339	061	The Utah proposed direction cannot rely on "such areas as wilderness" (Encl. 3, p.1) to provide suitable goshawk habitat. Management decisions in non-wilderness areas should not take into account wilderness areas; these areas are normally located outside of the northern goshawk's habitat range and typically consist of "rock and ice." The viability of the species will hinge upon decisions made on "suitable timberlands" not wilderness areas. This language should be removed from the final decision.	7300	7400
340	061	The Utah proposed direction is unacceptably vague in regards to roads and their effect upon the northern goshawk and its prey species. To simply "plan a transportation system to minimize disturbance" (encl. 4, p.5) 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 buildings roads for timber harvest and leaving existing roads open will not contribute to the goshawk's long-term viability. The final Utah goshawk management direction will need to address road building and road densities in goshawk habitat with concrete values and directives.	7300	4000 2400 1100
341	062	Northern goshawk habitat is primarily old growth forest and solid population numbers are indicators of healthy, functioning forest ecosystems. Due to fire exclusion, forest succession processes that create desired conditions for goshawk habitat have been unnaturally halted. Declines in goshawk populations have occurred. Logging is now the biggest threat to these declines. No management proposal that would allow for the logging of old growth forests, either by way of clearcutting, or selective cutting, is acceptable when the goal of the project is to maintain and restore functioning forested habitats for the northern goshawk and its prey.	7100	1100 6300

C#	L#	COMMENT	CAT 1	CAT 2
342	062	Northern goshawks are also dependent on large, connected corridors of diverse forest types which must be isolated from human activity. Commend the Forest Service for their work in providing connected corridors within each forest, but there is a need for connectivity across landscapes, throughout the state and throughout neighboring states in order to truly provide for adequate habitat, recruitment, and migration to nesting sites.	7100	6400 8300
343	062	Feel that this project centers around missing information that is deemed necessary for a fully quantitative population viability analysis (PVA). Without a PVA, there is a complete absence of actual numbers of northern goshawks and a lack of monitoring of these populations in the state of Utah. Therefore the project you are proposing using inventories of the quantity and quality of suitable habitat as a surrogate for PVA is arbitrary, ambiguous, and based on suspected trends rather than hard science.	7300	10000 11000
344	062	Currently goshawk populations on Utah's NFs are monitored only by counting nests in timber harvest areas. Follow-up monitoring of these nests is not implemented and the effects of timber sales on Utah's goshawk populations has not been documented. Not only is this unacceptable from a conservation and preservation standpoint, it is also in violation of the NFMA..	8600	10000
344A	062	The northern goshawk is a sensitive species in R4 and is also a management indicator species for all 6 NFs in Utah. Yet current populations have not been assessed. Would like a PVA conducted for northern goshawk populations before implementing a plan that may actually result in population declines in the state of Utah	2400	11000
345	062	Feel that the proposed project may lead to population declines.	7300	2400
346	062	Many of the management recommendations are based on the Reynolds guidelines for northern goshawk management in R3. These guidelines are based on entirely different habitat and ecosystem types and should not be used to base management decisions on in the state of Utah.	11000	8000
347	062	They [Reynolds guidelines] provide for clearing the understory and balancing structural stages across the landscape in site-specific projects in order to benefit goshawk populations. The Forest Service has stressed that goshawks are management indicator species for old growth forests in Utah. Old growth forests do not have cleared understories. The argument for clearing understories and using to increase goshawk populations is flawed and we feel it is a ploy to encourage more logging of Utah's old growth forests.	6000	2400 2300
348	062	Clearing the understory so that goshawks may more easily find their prey actually leads to the goshawk becoming prey for larger birds. Goshawks not only become prey to larger birds that feed on the same types of prey but they are also forced to compete with these larger birds for food and nesting sites. Habitat stratification is an important component of forest ecosystems, allowing for different competitive species to thrive. By clearing the understory, which this proposal would allow for in some cases, the strata occupied by different species are eliminated causing competition for resources and population and habitat declines. No management activity that would limit natural habitat stratification of Utah's birds of prey will be acceptable.	2400	6000
349	062	Native Processes - would like to know how the historic range of variation (HRV) has been determined for each of the six Utah NFs. Many of the proposed management activities are based on the HRV. Has there been research conducted relating to the variability of size, intensity, and frequency of native disturbance regimes? If not, are the HRVs simply assumptions of what Utah's forests historically looked like? If the HRVs are based on assumptions without research, then the management plan is unacceptable.	6000	
350	062	Would like to emphasize the fact that wildfires are essential when considering the HRV and we would like to encourage the use of fire rather than the vegetative manipulation and mechanical removal of trees, to reach these HRVs.	1300	1100
351	062	Composition - Feel that no non-native plant species should be introduced the management areas. Because of the potential to cause systems to move out of their historic range, no non-native plant species introduction for any reason should be permitted.	7100	6000
352	062	Recruitment and sustainability of early seral tree species in the landscape should be accomplished through fire, not through any type of mechanical tree removal.	1300	1100
353	062	Structure - Desired changes in structure should also involve fire and not mechanical tree removal.	1300	1100
353A	062	What is the "best existing available information" to complete the assessment for HUC. This is arbitrary and ambiguous.	6000	11000

C#	L#	COMMENT	CAT 1	CAT 2
354	062	Standing dead trees (snags) are extremely important for northern goshawk habitat. Green trees should not be permitted to substitute for snags.	7100	6600
355	062	All of the project goals have specific cover type prescriptions. Are these arbitrary numbers or are they based on research. It seems the proposed management plan is based on assumptions and is lacking hard scientific evidence.	7300	11000
356	062	Monitoring - would like to know how the proposed monitoring requirements will be implemented. We are concerned with the lack of monitoring information now available. It is very difficult to make sense of your proposed monitoring requirements chart and to get any real information on how the monitoring will be conducted. How do you plan to do monitoring when you don't know what is out there in the first place?	7300	8600
357	062	Commend the FS for realizing the threat to northern goshawk populations in the state of Utah and for attempting to develop a management plan that will combat population declines. However, feel the plan is arbitrary and lacks scientific foundation.	11000	10000
358	062	Concerned that guidelines from an entirely different region will be used to manage Utah's goshawk populations. These guidelines are old, arbitrary and based on entirely different forest ecosystems and habitat conditions.	11000	10000
359	062	Concerned that the effects of livestock grazing are not addressed by the proposed plan.	7100	5300
360	062	The proposed plan calls for vegetative manipulation for achieving structural changes. Feel that any and all vegetative manipulation besides the use of prescribed fire is unnecessary and should not be considered without further analysis.	1000	1300
361	062	The effects of livestock grazing on goshawk populations after vegetation manipulation must be addressed. The plan does not address the role that livestock will have on the food and prey base of the northern goshawk nor does it address the role that livestock play in altering the forest components that this plan is trying to replicate and preserve.	7100	5300
362	062	Concerned with the lack of monitoring information available for northern goshawk on all of Utah's NFs. It is in violation of NFMA not to have monitoring information on MIS especially sensitive MIS such as the northern goshawk. Would like to see more monitoring, research, and data on northern goshawk populations before any decisions are made that may very well defeat the purposes that we re all trying so hard to achieve.	7300	8600 10000
363	062	The purpose is to protect northern goshawks and their habitats, yet many of the proposed actions pose serious threats to both.	7300	2400
406	062	If R4 planning to implement the R3 goshawk strategy within Utah - that strategy didn't address prey habitat adequately	7300	
364	063	I am greatly concerned that the work put into this documents may not be enough to stave off the latest attack by the environmentalists, see article that is included. [Article is "Arizona Environmentalists Sue to Protect Northern Goshawk"] - is your northern Utah goshawk report enough of a document to stave off the environmentalists attack on the multiple use concept mandated by Congress many years ago?	8000	
365	063	"Alternatives" (pg. 2 of scoping document) - will any action be effective against environmental groups?	8000	
366	063	Encls. 1, need, ¶2 "perhaps one of the greatest influences on habitat is fire exclusion" so instead of fighting fires, they are to be alone? Logging and controlled burns would be useful. What has happened to the multiple use concept?	7600	10000
367	063	Encl. 3, ¶2, items 3 & 4 - 3 and 4 might be considered as discriminating against rural areas.	9000	
368	063	Encls. 4, pg. 3, Guideline 1 "when initiating vegetative management treatments..." - what will the cost of this be if the proper management is accomplished?	7300	8200 6700
369	063	Pg. 4, Guideline "restrict management activities and permitted use..." - many ranchers are worried about their grazing permits, logging companies about timber permits and road use permits, and demo fee usage by recreationists.	7300	5000
370	063	Pg. 4, Guideline "Identify a Post-Fledgling Area"...-Nearly a square mile of area, in effect, closed to a multiple use concept. How would this be enforced?	7300	
371	063	Pg. 5, (d) - In many areas, more than just lumber harvesters use the same roads. Why discriminate?	7300	4000

C#	L#	COMMENT	CAT 1	CAT 2
372	064	Currently operate 2 mines within USFS lands. The majority of the properties are located in the Manti-LaSal NF. After reviewing 2 USDA publications, "The Northern Goshawk in Utah: Habitat Assessment and Management Recommendations" and "Utah Northern Goshawk Project Statement of Purpose and Need", it is apparent that a large portion of our current leases and planned expansion areas are within areas considered to be a least high value habitat areas and in the case of the Skyline Mines within the optimum value habitat areas. Also, it appears that grazing, timbering, and fire suppression have the greatest negative effect on the northern goshawk's habitat. Since no specific mention of subsurface mining activities is made in these documents, I am cautiously optimistic that the potential impacts of subsurface mining on the habitat were considered and found to be insignificant.	7400	5400
373	064	Typically, vegetation is not significantly affected by subsidence due to long wall mining if there is sufficient overburden and soil cover. I am unaware of mining subsidence caused by us within FS lands resulting in loss of vegetation or the toppling of trees. Therefore normal underground mining operations should not have an adverse effect on northern goshawk habitat. It is important to note we conduct annual raptor surveys of the active mine surface area and of areas to be subsided.	5400	
374	064	One important aspect of our mining activities, exploration drilling, does include minor surface disturbances. In the past, applications have been made to the forest to allow for these disturbances. Typically an EA has been conducted of the proposed drill sites and access roads. If occupied raptor nests are located within at least 1/2 mile radius (dependant upon topographic conditions) of the new roads/drill sites, construction of the sites and drilling is not allowed to begin until after July 15 or until the nests are vacated.	5400	7400
375	064	My concern is that a change in the Forest management policy consider the effects the change may have on underground mining and exploration activities. Mine plans are typically developed on a 5-year basis and updated frequently throughout each year. Changes in the type and timing of activities allowed and the management practices implemented for those practices can have significant impacts on the mining plan and the profitability of the operation.	7300	5400
376	064	I support managing the NFs within the state of Utah to enhance the northern goshawk habitat.	8000	
377	065	I feel that maintaining bio & genetic diversity in our NFs and public lands should be the primary concern.	6000	
378	066	While the proposal has many good management ideas, there are 4 crucial factors that you should consider: 1- goshawk is dependent upon old growth forests for nesting and rearing of young; 2- goshawk require large territories of diverse ecologically integral forest types which must be isolated from human activity; 3- goshawks have never prospered in areas where timber is harvested, clearcuts or selective harvesting; 4- natural fires are essential in maintaining these integral and diverse forests.	2400	
379	066	The best management strategy for goshawk is to allow ecological processes to work, including natural fires. Goshawks don't need roads, saw, and logging.	7100	6000
380	067	In my opinion this whole project is just a huge waste of taxpayers money.	8210	
381	068	Your options seem viable tho satisfying all groups is probably a study in frustration.	8000	
382	069	We feel more regulation and restriction implemented for the goshawk preservation is not necessary and will not be economical to the multiple-use concept of federal land.	7700	5000 8210
383	069	The decrease in timber harvest and increase of regulation will be counter-productive. It appears that the concern for goshawk habitat is resulting in a cutback of timber harvest.	5000	1100 8210
384	069	We are of the opinion that the process used to determine the goshawk population was reached without sufficient scientific studies and therefore not totally valid.	11000	
385	069	A suspected downward trend in population is hardly reason to change management practices on federal land in the state of Utah.	8000	
386	069	We are concerned with the trend toward a cutback in harvested timber. There are large areas of dead timber that are left to rot away when they could provide an economic benefit for the counties.	5000	1100
387	070	In favor of proposal to restore functioning forest habitats on NFS lands.	6000	
388	070	In favor of using more prescribed fire to manage habitat and restore function .	1300	
389	070	Extensive letter on air quality - referred to fire amendment team	12000	

C#	L#	COMMENT	CAT 1	CAT 2
390	071	... wants to be involved in this issue and in the development of the revised Forests Plans or the amendments to those plans.	8500	
391	071	One of our major concerns regarding this proposal is the level of uncertainty of statements made in the FS proposal. On page 1 of Encl. 1 under the Need section it states in ¶4, "However, the scientists were not able to predict future habitat conditions because of the great latitude in management allowed by current land management plans and policies on state and federal lands." Earlier in ¶2 under the Need section it states, "Changes in forest structure, especially large tree removal, and other forest management activities singly or in combination (may) negatively affect Goshawk populations". We realize that this is not exact science and that what you are looking for is consistency in management. However, one level of consistency or one set of consistent objectives is just as consistent as another level or set. In other words, to say that 30 A around each nest site or 30 downed logs of Ponderosa per 10 A is the correct number is purely subjective but is consistent. Substituting 20 A and 20 downed logs could just as well be used and would be just as consistent. Our point being that your key element is consistency and not certainty. It is this uncertainty that is our main concern.	7600	11000
392	071	As you proceed to manage for this sensitive species other uses of the land that come in conflict with the use for goshawk habitat will likely be restricted. These restrictions will be as a result of the guidelines established which are based on uncertainty. Since logging and grazing are two such competing uses we would like to see conservative numbers used in the calculations as to what is needed for the well being of the goshawk. We feel that the minimum downed logs, minimum snags and minimum coarse and woody debris numbers are excessive. Not only would these numbers impact logging but they would increase the fuel load buildup and potential risk for fire and the potential for more destructive fires. These destructive fires would in turn destroy the habitat that you are trying to create for a species you are trying to protect. Great caution should be used in level of snags, downed logs and woody debris. The higher numbers would also create more of a disease environment. It should also be noted that the logging industry could be used to establish more conservative levels of these numbers for prey habitat and goshawk habitat by logging the areas and certain logging practices.	5000	2400 11000 6000 7300
393	071	Another concern we have is the assumption that is made that the goshawk needs old growth trees in which to live. We have talked to many private forest landowners who have stated that they have witnessed goshawk nesting in juniper and young conifers. It is reasonable to expect that if the goshawk has a prey base that they will nest in a variety of trees. Also the assumptions that are made in relation to historic range of variation on species prior to European settlement can be questioned. Not enough information is available to substantiate the assumptions you make.	11000	6000
394	071	... could not support this proposal if it is to be used for the purpose of restricting other uses. However, if it is used to protect the goshawk habitat in ways that make the species compatible with other uses without restricting or eliminating other uses then we could support it as long as it uses more conservative numbers. Basic enterprises such as livestock and logging are critical to the well-being of the local communities that are surrounded by or are adjacent to the National Forests. The FLPMA and NEPA both direct federal land management agencies to analyze the effect to local economies by actions taken by the agencies. We would encourage you to allow flexibility in the management of goshawk habitat. Because there is so much uncertainty concerning this species, its prey base and its habitat requirements it will be necessary to make adjustments along the process.	7300	5000 10000
395	072	Since 1979 I have watched the gradual disappearance of the goshawk from our Wasatch Range. The reasons for this disappearance are very clear. Forests have been cut down by ski companies, private homeowners, and logging concerns. Roads have been built. Human backcountry use has exploded beyond levels which the goshawk could tolerate. Snowmobiles and ski helicopters have brought in intolerable noise, but to a nesting goshawk, just the close proximity of a large group of hikers is intolerable. Therefore, I am certain that you will agree there is only one way to restore the goshawk to Utah's NFs. Restore the Forests. Insist that large tracts of National Forest land be declared wilderness. This is particularly feasible in the Uintas because there is still much land in those rugged mountains that easily qualifies for wilderness designation. If you can do this - and it is the only way to restore the goshawk - then your job will be easily. The natural ecosystems of wild places will restore the goshawk for you, places without roads, without use, without logging, without mining, without grazing, without huge numbers of people.	7100	6000 2000 5000 4000

C#	L#	COMMENT	CAT 1	CAT 2
396	073	It appears that you are planning a very extreme management change, I would like to know why you would exclude the wilderness areas?	7400	7300
397	073	We feel there are sufficient management tools already in place and any change would severely impact multiple use and cultural resource user. We strongly believe a "no action alternative" would be appropriate.	7700	
398	074	We applaud the FS's efforts to conserve this species at a point in time when such management is not specifically required under the ESA. This is consistent with USDI's intentions to manage ecosystems and avoid regulatory, economic, and biological "train wrecks" which occur when a species slips to the brink of extinction. When this occurs, only more radical and painful resolutions remain, limiting discretion of all affected parties. This example of an effort to keep common species common via large-scale habitat management is to be commended, and it will hopefully be replicated with other species and in other locations. We suspect that the FS's habitat-based management will benefit many other forest-dependent species. We strongly encourage the adoption of the subject amendment by all National Forest plans in Utah.	7300	2400
399	075a	Adopt strict and effective measures	7300	
400	075a	Not enough to adopt guidelines which focus on nest stand protection	7300	
401	075a	Avoid copying the Southwest guidelines	7300	
402	075a	Fully protect 6000 A of foraging habitat within every goshawk home range;	7300	
403	075a	Ban logging of all old-growth and mature trees everywhere	7100	
404	076a	Fully protect 6000 A of foraging habitat within every goshawk home range	7300	
405	076a	Ban logging of all old growth and mature trees across the landscape	7100	
409	077a	Fully protect 6,000 acres of foraging habitat within every goshawk home range	7300	
410	077a	Ban logging of all old growth and mature trees in these forests.	7100	
411	078a	Protect the Northern Goshawk and the 6000 acres of foraging habitat within every goshawk home range	7300	
412	078a	Ban logging of all old growth and mature trees across the landscape	7100	
413	079a	Ban logging of all old growth and mature trees across the landscape	7100	
414	079a	Fully protect all 6,000 acres of foraging habitat within every goshawk home range.	7300	
415	080a	Ban logging of all old growth and mature trees across the landscape	7100	
416	080a	Fully protect all 6,000 acres of foraging habitat within every goshawk homerange.	7300	
417	081a	I would like to go on record as being opposed to designating land for controlling purposes. I am not opposed to protecting the land and ecology. However, past performance has always been that this type of approach seems to be an unreasonable decisions directing our agencies to restricted or prevent land use.	7300	
418	081a	There are attributes to the NFs that would be enhanced by vegetation manipulation. If these areas were managed under the multiple use concept, as intended, rather than being planned as set aside for protection, we could have the animal diversification desired.	7100	1000 7300
419	082	The major area of our concern is the Ashley NF. Some of the assessment for these areas we believe is flawed. There is a very substantial amount of area that is beetle kill. These areas need to be cleaned up and reforested at the fastest rate possible because of the unpredictable weather and winds of this area of the Ashley Forest. We recommend that these areas be mechanical cleaned up (logging, firewood use) then reforested and then periodical thinning.	1100	1400
420	082	The logging of other areas will help improve goshawk habitat by selective cutting. Then where necessary replanting and periodical thinning.	1100	1500
421	082	We do not believe that there needs to be any reduction in the number of AUMs in the Ashley area. We believe that with improved grazing practices, grazing can and will help improve the goshawk habitat.	5300	2400
422	082	We believe that with these actions [comments 420-421] taken and along with an on-going study of goshawk patterns we will be able to improve the habitat and increase the population of the goshawk and other wildlife, and maintain the current and future activity levels without any management changes that would adversely affect the economic bases of Uintah, Duchesne, and Daggett Counties.	2000	5000
423	082	Any restrictions on access, grazing, or timber harvesting would be in violation of the Uintah County General Plan.	10000	4000 5100 5300

C#	L#	COMMENT	CAT 1	CAT 2
424	083	Don't let the tail wag the dog. By your own statement, there is no apparent danger for the goshawk (paragraph 3, 1st pg). Someone is apparently going on a fishing expedition to change strategies.	7700	
425	083	Why not spend the money on more germane projects that actually enhance our use of our forests but still monitor the status of the hawk in the future.	8210	
426	084	We believe it is important to integrate the effects of livestock grazing on goshawk habitat in terms of effects on prey species, aspen regeneration, etc.	5300	2000
427	084	The distribution of mature and over mature tree stands for goshawk nesting is a key issue. Although they have the capability to disperse widely (60 miles) as indicated in conservation assessment) it is important that mature and over mature forested areas be distributed more frequently.	6300	2400
428	084	The effects of disturbance such as roads need to be addressed.	4300	8300
429	084	We commend the FS for their goshawk conservation leadership.	9000	
430	085	The first thing that I see is that there has not been any well established documenting of the real need for anything to be done at this time. ... As I see this, it is an attempt to put into action something that does not have a real need.	11000	7700
431	085	It is very apparent that there are some that would move their schemes forward to remove everyone off the National Forests. ... These kinds of unfounded movement have caused a big problem for all involved that have historically used the Forest lands.	9000	
432	085	I have observed that the goshawk has been in every increasing numbers as Hickens pheasant farm has released more birds and their winter food has increased. After having conversations with the biologist from the Forest Service and learning that winter is the time of the greatest loses in goshawk because of the young not knowing all that it may take to sustain itself, I would suggest that you look at winter feed. Not controlling the habitat of that which does not need our attention, or at least that we have enough data over long enough a time intervals to be somewhat accurate.	2400	
433	085	I would say that Duchesne County is in direct opposition to what the FS is trying to do concerning the northern goshawk project. There is not adequate nor accurate data to support the need for such a project.	9000	11000
434	086	The Duchesne County General Plan states that decisions altering existing resource management practices and land uses should be supported by accurate and adequate data. Grazing (interestingly enough, both wildlife and cattle are mentioned in the study) and timber harvests are identified as land uses potentially impacting goshawk habitat. As a result, both uses may be altered as management directives are implemented. It is the County's position that the EA should clearly identify the impacts attributable to all uses and past resource management practices and that management directives be developed accordingly.	8300	10000 5000
435	086	Several [Duchesne] County industries (e.g. timber, grazing, and recreation) are economically dependent upon Forest Service lands and the accompanying resources. As articulated in our General Plan, it is the County's position that EA alternatives should identify and address detailed social/economic impacts, particularly those associated with implementing the proposed management directives.	5000	9000
436	086	The County [Duchesne] feels that wildlife interests must be balanced with other local priorities.	5000	2000
437	086	Duchesne County Public Lands Committee membership includes several individuals who can provide valuable insight and information to this study. The County will make every effort to ensure that these individuals are involved. The U.S. Forest Service should also feel welcome to solicit committee involvement as the process continues.	8500	
438	087	I believe the biggest problem to the survival of the goshawk and its prey and wildlife is the terrible practice of the government to not harvest the dead, dying and blow down timber.	1000	
439	087	When we create large quantities of fuel by either putting out fires and/or not harvesting all dead and down timber, we create an artificial fuel load that in turn when ignited burns vast areas by creating its own fire storms. Some of this (most of this) will take 40-80 years plus to grow new forest. Some argue this is natural but its only natural when we never put out fires and we let all fire go untouched.	1200	
440	087	We should control fires but we also need to salvage log and thin the forest and then have controlled ground fires to control disease.	1000	

C#	L#	COMMENT	CAT 1	CAT 2
441	087	Man can have jobs and a healthy forest, vibrant wildlife, if we use good forest planning. Healthy wildlife and healthy timber industry are one in the same if we are allowed to manage the forest properly.	5100	

## **GUIDE for comment categorization:**

### **1000 - Vegetation Management**

- 1100 - Commercial Timber harvest
- 1200 - Fuels management
- 1300 - Prescribed natural and management ignited fire
- 1400 - Insect and Disease management
- 1500 - Reforestation

### **2000 - Wildlife Habitat Management/Wildlife Populations**

- 2100 - General
- 2200 - TEP and S species
- 2300 - MIS species
- 2400 - Goshawk

### **3000 - Recreation/Visuals Management**

- 3100 - motorized recreation
- 3200 - non-motorized recreation
- 3300 - visuals management
- 3400 - general

### **4000 - Transportation/Access Management**

- 4100 - access for falconers to nest locations
- 4200 - Trails management
- 4300 - Forest System Roads Management

### **5000 - Economic Considerations**

- 5100 - Timber Industry
- 5200 - Recreation/Tourism
- 5300 - Livestock Grazing/use
- 5400 - Mining/Energy
- 5500 - Permitted Human Use/Special uses/Personal use products

### **6000 - Biodiversity Elements and Ecosystem Management**

- 6100 - Vegetation diversity
- 6200 - Wildlife diversity
- 6300 - Mature and Old Forests
- 6400 - Habitat Connectivity
- 6500 - Edge effect
- 6600 - Snags
- 6700 - Down Woody Material/logs
- 6800 - Canopy Closure

## **GUIDE for comment categorization:**

### **7000 - Alternatives**

- 7100 - Range of Alternatives
- 7200 - Preferred Alternative stated (does not apply in scoping; applies in review of environmental document)
- 7300 - Proposed Action
- 7400 - Exemption Areas (where direction will and will not apply)
- 7500 - Will direction apply to future and/or current ground disturbing projects?
- 7600 - Purpose and Need
- 7700 - No Action Alternative (continue current management)

### **8000 - Other**

- 8100 - Heritage Resources
- 8200 - Feasibility (ability to implement direction due to cost/staffing constraints)
- 8210 - Management priorities (is it a wise-use of funds to do this project with all the other big ticket items left to do?)
- 8300 - Effects disclosure (direct, indirect, and cumulative effects)
- 8400 - Relationship to current forest plan or Regional Guide.
- 8500 - Public Involvement/Relations
- 8600 - Monitoring Requirements
- 8700 - Public Health and Safety
- 8800 - Roadless Areas
- 8900 - Adaptive Management

### **9000 - Social/Human Dimension/Spiritual** (includes population growth, urban interface, etc.)

### **10000 - Legal Issues/policy/FSM or FSH direction**

- 10100 - Interim Roads Policy

### **11000 - Science Foundation**

### **12000 - Physical Resources** (water, soil, air, etc.)