

UINTA NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN Supplemental Information Report (SIR) and Determination

I. PURPOSE OF THIS SIR

CEQ NEPA regulations (40 CFR 1509.2(c) and FS NEPA procedures) require supplementation of NEPA documents when there are "significant new circumstances or information relevant to environmental concerns and bearings on the proposed action or its impacts."

The purpose of this SIR is to determine if the *Conservation Strategy and Agreement for the Management of Northern Goshawk Habitat in Utah* (Utah Conservation Strategy) represents significant new information or changed conditions bearing on current Land and Resource Management Plan (LRMP) direction or the effects identified in the Final Environmental Impact Statement (FEIS) for that LRMP.

II. INTRODUCTION

NFMA directs the Secretary of Agriculture to issue regulations for the development and revision of forest plans (16 U.S.C. S 1604(g)). These regulations are codified at 36 C.F.R. S219. A forest plan is a dynamic management plan that guides future decisions. It provides multiple-use goals and objectives that constitute the "vision" (or intentions) of the Forest Service regarding the planning unit. The forest plan describes the desired future condition of the Forest, and how progress toward it will be made through the planning period. In addition to providing multiple-use goals and objectives, the plan has some features of a zoning ordinance in that it permits or prohibits activities, and establishes standards and guidelines that regulate them. Thus, standards and guidelines comprise "sideboards" in achieving goals and objectives.

In response to the regulations cited above, the Dixie National Forest in Utah developed a forest plan. The Record of Decision (ROD) to implement this Land and Resource Management Plan (LRMP or Forest Plan) was signed in October 1984. The six decisions made in the ROD

- established forestwide multiple-use goals and objectives;
- established forestwide standards;
- established forestwide guidelines;
- delineated management areas and associated management prescriptions;
- identified lands not suited for timber production; and
- established monitoring and evaluation requirements.

These six decisions, in part, addressed requirements at 36 C.F.R. S 219.19 that "wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area." This section further specifies that "habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area." *Id.* In order to estimate the effects of each alternative on fish and wildlife populations, certain vertebrate and invertebrate species present in the planning area were identified and selected as management indicator species (MIS) whose "population changes are believed to indicate the effects of management activities." 36 C.F.R. S 219.19(a)(1). The northern goshawk is an MIS for the Uinta National Forest LRMP.

This SIR assesses the need to change (i.e., amend) one or more of the six decision points made in the Uinta National Forest LRMP due to new information in the Utah Conservation Strategy. This strategy has been developed for use by National Forests in Utah, in part, to further ensure satisfaction of requirements at 36 C.F.R. S 219.19 for the northern goshawk. The strategy is based on information and recommendations

found in the *Habitat Assessment and Management Recommendations for the Northern Goshawk (Accipiter gentilis) in Utah* (Graham et al. 1998; in press) and *Management recommendations for the northern goshawk in the southwestern United States* (Reynolds et al. 1992).

At 36 CFR S. 219.10(f) it states "The Forest Supervisor may amend the forest plan. Based on an analysis of the objectives, guidelines, and other contents of the forest plan, the forest supervisor shall determine whether a proposed amendment would result in a significant change in the plan. If the change resulting from the proposed amendment is determined to be significant, the Forest Supervisor shall follow the same procedure as that required for development and approval of a forest plan. If the change resulting from the amendment is determined not to be significant for the purposes of the planning process, the Forest Supervisor may implement the amendment following appropriate public notification and satisfactory completion of NEPA procedures."

Therefore, this SIR will compare the six decision points made in the land and resource management plan to information in the Utah Conservation Strategy to determine if the Strategy can be implemented under the current forest plan, or if amendments are required.

Viability of the Northern Goshawk and the Forest Plan

36 C.F.R. S 219.19 requires that "wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area." It also specifies that "habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area." To meet these requirements for a far-ranging, broadly distributed species such as the northern goshawk--where a Population Viability Analysis (PVA), or surrogate analysis, is conducted at scales larger than an individual planning area--it must be clear what role individual planning areas (i.e., forest plan units) play in sustaining population viability at the larger scale. Matching the scale of analysis to the scale of biological processes is key to the success of PVA. Different taxa, and different ecological processes that influence the life histories of those taxa, call for analyses at different scales.

For the goshawk, the planning area managed under a Forest Plan provides an important piece of the total habitat that ensures maintenance of species representation throughout the area which defines a self-sustaining population (i.e., the aggregation of landscapes within the State of Utah). Habitat found on each forest provides connectivity and travel lanes, contributes to genetic diversity, and increases the number of individuals in the larger population.

Though the assessment completed by Graham et al. found that current habitat appears to be capable of supporting a viable population of goshawks at the State spatial scale, it recognized that "habitat deficiencies may be present at the local level" because of the coarse scale of the assessment. The Strategy provides administrative units with the necessary background information and analysis procedures to insure that projects proposed in areas involving goshawk habitat, or potential habitat, are properly designed and implemented to meet habitat goals.

Following the guidance in the Strategy will ensure that the administrative unit sustains habitat for the maintenance of species representation throughout the planning area over time, and contributes to sustaining habitat connectivity among National Forests. Connectivity among habitats is a key element to population viability because it allows juveniles to disperse from natal areas and individuals to emigrate to new areas. Connected habitat makes it possible for individuals to recolonize habitats or emigrate to new breeding territories throughout the State when habitat values change locally.

III. Relationship between species assessments, conservation strategies, and Forest Plan management direction

Species Assessments

The Habitat Assessment and Management Recommendations for the Northern Goshawk (Accipiter gentilis) in Utah (Graham et al. 1998, in press) considered goshawk habitat relationships and needs, historic and current range, demographic features and population trends, and limiting factors, and provided an estimate of long-term persistence considering past, present, and anticipated future conditions. To complete the assessment Graham et al. considered a portion of the species range (the State of Utah) to address management concerns. Within this spatial area, all land ownerships were included in the assessment to evaluate the contribution of National Forest System lands to long-term persistence and viability. This assessment included habitat findings not only for the goshawk, but also for its prey and other associated species. These findings provide the foundation for the Strategy.

Conservation Strategies and Agreements

The *Conservation Strategy and Agreement for the Management of Northern Goshawk Habitat in Utah* (1998) was developed from information in the *Habitat Assessment and Management Recommendations for the Northern Goshawk (Accipiter gentilis) in Utah*. It recommends management approaches to restore or maintain ecological integrity of goshawk habitat; this contributes to species viability. Management recommendations provide the framework for developing management direction in forest plans to meet the needs of the goshawk, its prey, and associated species.

Forest Plan Management Direction

A forest plan is a dynamic management plan for making future decisions. It has some features of a zoning ordinance in that it permits and prohibits activities, and establishes standards and guidelines ("sideboards") that regulate them.

These sideboards are intentionally broad to accommodate the needs of the many resources; allow for adaptation to the inherent variety of site-specific conditions on a forest; and accommodate adaptation as better science becomes available or policy changes. Plan direction does not provide detailed descriptions of how goals and objectives are to be achieved at the project level. However, the general path defined by the sideboards is narrow enough to insure ecosystem integrity and resiliency are retained, a sustainable level of products and services is provided, and laws and regulations are not violated while project implementation moves the planning area towards its vision.

The Uinta National Forest must determine if implementation of this conservation strategy

- redefines the forest plan vision, as defined by its goals and objectives; and,
- is consistent with the existing forest plan direction (sideboards).

If implementation is consistent, the Forest must determine whether the stipulations in the Strategy are different than the operational boundaries defined by the sideboards (i.e., standards, guidelines, general direction, management area prescriptions). If they are, operational sideboards must be reconsidered, and the significance of the proposed changes must be assessed (FSH 1909.12 (5.32(3))) based on NFMA planning requirements.

This SIR assesses the ability of the current Uinta National Forest plan to implement management recommendations of the Strategy across the planning area.

Below, Part IV - *Evaluation of Forest Plan Adequacy for Implementing the Utah Conservation Strategy*, Part V - *Summary and Conclusions*, and Part VI - *Determination of Need to Amend Current Forest Plan* (and if an amendment is needed, significance of the amendment).

UINTA NATIONAL FOREST

The Role of the Uinta National Forest in Sustaining Viable Populations of Goshawk at the State Scale

36 C.F.R. S 219.19 requires that "wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area." It also specifies that "habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area." To meet these requirements for a far-ranging, broadly distributed species such as the northern goshawk--where a Population Viability Analysis (PVA), or surrogate analysis, is conducted at scales larger than an individual planning area--it must be clear what role individual planning areas (i.e., forest plan units) play in sustaining population viability at the larger scale:

The planning area managed under a Forest Plan provides an important piece of the total habitat that ensures maintenance of species representation throughout the area which defines a self-sustaining population (i.e., the aggregation of landscapes within the State of Utah). Habitat found on each forest provides connectivity and travel lanes, contributes to genetic diversity, and increases the number of individuals in the larger population.

Based on Forest Inventory and Analysis (FIA) data compiled in 1995, forest land (all ownerships) is found on roughly 29 percent (15.7 million acres) of the State of Utah's 54 million acres. Forest land is made up of 58 percent (9.2 million acres) pinyon-juniper and juniper woodlands; the remaining 42% (6.5 million acres) is timberland (based on forest type classifications). Timberland refers to those lands that are typically dominated by tree species favored for commercial timber harvest (i.e., "timber species" such as ponderosa pine, Douglas-fir, and Englemann spruce). This is a land area classification system and is not intended to infer a land use such as timber harvest will occur.

Forested land classed as timberland in the FIA report is most important for goshawk habitat. Though the woodland areas (including pinyon/juniper) have some value as winter foraging habitat, no nesting goshawks have been located in this type. The USDA Forest Service manages 81% of the timberlands in Utah (those lands with forest types or habitat types that may be capable of achieving the high or optimum value habitat described by Graham et al.).

The Uinta National Forest encompasses 883,225 acres in north central Utah (FIA, 1997). It is made up of 552,021 acres of forest land and 331,204 acres of nonforest land or water. Forest land is made up of 68% timberland (377,651 acres) and 32% woodland (174,370 acres), based on FIA forest types. Relative to the State of Utah, the Uinta National Forest timberland component represents roughly 6% of the land with forest types or habitat types that may be capable of achieving high or optimum value. However, some timberland sites on the Uinta do not have the productive capability to grow trees of sufficient size and density to meet nest stand characteristics as defined by Graham et al. To achieve an overall habitat rating of high or optimum, a site must be capable of achieving high value for nesting *and* high value for at least one forage/prey species.

Though finer resolution data will be used during project-level landscape assessments to identify "local deficiencies" within a landscape, the coarse scale assessment completed for the State of Utah by Graham et al. provides indicators of habitat conditions on an individual National Forest. The Graham et al. assessment indicates that forest land on the Uinta is roughly classed as having 35% optimum habitat, 8% high-value habitat, and 57% moderate- to low-value habitat. Most optimum and high-value habitat occurs on the Heber Ranger District. The Pleasant Grove and Spanish Fork Ranger Districts generally lack goshawk habitat due to lack of the forest land component classed as timberland component.

In concert with the statewide assessment, the greatest existing and potential cause of habitat loss on the Uinta National Forest (all districts) is lack of fire in the ecosystem. Fire exclusion, by altering native successional pathways, has dramatically altered forested ecosystems. Ingrowth of shade-tolerant tree species (late seral) and buildup of fuels is an example (local deficiency). This deficiency has resulted in stands becoming unstable and higher risk to stand-replacing wildfire.

Integrating principles of the conservation strategy in both landscape and project planning to promote desired habitat attributes (i.e., large trees, snags, etc.) will help ensure that projects are developed in such a way as to maintain existing habitat and restore "local deficiencies". For example, strategy recommendations describe a need to restore and maintain greater proportions of old forest and than is currently provided for under the Uinta National Forest Plan (refer to discussions below).

Both fire and mechanical treatments will be needed to restore and maintain desired habitat. For example, in the Graham et al. 1998 assessment it states that "...current management policies provide latitude for improving goshawk habitat if applied within reasonable ecological constraints. For example partial cutting systems are used to maintain or improve stand characteristics for goshawks and their prey, with overall positive effect on goshawk habitat. In addition, timber harvesting has the potential to convert cover types to earlier seral vegetative communities, which is generally good for goshawks. Thus current management policies provide for a wide range of implementation options, with a correspondingly wide range of possible effects on goshawk habitat. The critical decisions are those being made on individual project level analyses, because this is where managers can use the best available information to insure projects are providing for goshawk habitat needs."

In addition to sustaining habitat--including connectivity--within the Uinta National Forest planning area, it's important to maintain habitat connectivity with adjacent forested landscapes. Habitat on the Uinta National Forest connects habitat on the Wasatch-Cache National Forest to the north, the Ashley National Forest to the east, and the Manti-LaSal National Forest to the south.

The Uinta and Wasatch-Cache National Forests were recently (March 1998) designated the Northern Utah Ecogroup by the Regional Forester. This is an administrative designation meaning that the forests will jointly plan landscape activities at the forest planning scale. Accounting for goshawk habitat needs will be a part of normal business operations. In addition, the Northern Utah Ecogroup will continue to coordinate goshawk habitat management with the other four forests in Utah, based on the requirements outlined in the monitoring section of the Strategy. (The Manti-LaSal and Ashley National Forests comprise the Eastern Utah Ecogroup, the Fishlake and Dixie comprise the Southern Utah Ecogroup.)

The statewide assessment identifies very little forest land in BLM or State ownership that is capable of reaching optimum or high-value habitat that lies within 60 miles of the Uinta National Forest. Consequently, the Uinta National Forest will concentrate its available resources on ensuring habitat connectivity with the Wasatch-Cache, Ashley, and Manti-LaSal National Forests.

Connectivity among habitats is a key element to population viability because it allows juveniles to disperse from natal areas and individuals to emigrate to new areas. Connected habitat makes it possible for individuals to recolonize habitats or emigrate to new breeding territories throughout the State when habitat values change locally.

Implementing the intent of the principles and processes in the Strategy to address possible deficiencies will further ensure that the Uinta National Forest does its part to sustain goshawk habitat in the planning area and maintains connectivity with neighboring habitat areas. That Strategy applies management recommendations contained in the *"Habitat Assessment and Management Recommendations for the Northern Goshawk in Utah"* recommending actions that should be taken by Utah National Forests and the Bureau of Land

Management to restore and maintain goshawk habitat. These agencies will contribute to sustaining short and long term habitat for goshawks which is important to the Statewide viability of the species.

IV. Evaluation of Forest Plan adequacy for implementing the Utah Conservation Strategy

The following table lists Utah Conservation Strategy stipulations and compares them to applicable direction in the Forest Plans.

a) Comparison of the Utah Conservation Strategy to Current Forest Plan Goals and Objectives.

1998 Conservation Strategy	Uinta National Forest Plan
<p><i>Goal:</i> (Strategy, Page 6) Provide habitat capable of sustaining viable populations of goshawk in the state of Utah.</p>	<p><u>Forest Policy</u> - "Manage the Forest ecosystem to maintain vegetation diversity, providing wildlife habitat for a large variety of species. Give special emphasis to... snags...old growth timber, and habitat of threatened, endangered, and sensitive species." (LRMP, p. 3-153)</p> <p><u>Wildlife Goal No. 1</u> - "Continue to manage Forest aquatic and riparian habitat to provide and maintain viable and well distributed populations of desirable fish and other aquatic species to avoid or eliminate threatened, endangered, and sensitive classifications; provide for public demand within capability and suitability potential; maintain and perpetuate all existing native aquatic and riparian fauna; and achieve cooperatively established output objectives with the Utah Division of Wildlife Resources (DWR)." (LRMP, p. 3-44).</p> <p><u>Wildlife Goal No. 7</u> - "Maintain and develop suitable habitat for wildlife and for game and nongame fish populations by coordination with other resource uses. Develop specific improvement projects to maintain a viable population of existing resident and migratory invertebrate species. Improvement/degradation of fish and wildlife habitat as a result of project activities and the resultant change in populations of the Management Indicator Species (MIS) will be measured by the Habitat Capability Index displayed in Appendix G."</p> <p><i>Objective 7</i> - "Continue cooperation with State and other Federal agencies to establish specific management objectives for various fish and wildlife types on the Forest..." (LRMP, p. 3-46 to 3-47)</p> <p><u>Wildlife Goal No. 8</u> - "Maintain and improve habitat of management indicator species selected according to the following criteria (include endangered, threatened, and sensitive plants and animals identified on State and Federal lists): Species with special habitat needs that may be influenced significantly by planned management programs; species commonly hunted, fished, or trapped; and species where population changes are believed to indicate the effects of management activities on other species of a major biological community or water quality. Improvement/degradation of fish and wildlife habitat as a result of project activities and the resultant change in populations of the Management Indicator Species by the habitat Capability Index displayed in Appendix G." (LRMP, p. 3-48)</p> <p><u>Wildlife Goal No. 9</u> - "Maintain proper emphasis to wildlife and fish resources in land management planning. Continue to protect threatened, endangered, and sensitive species and native game and nongame species. Introduce and maintain exotics where justified." (LRMP, p. 3-48)</p> <p><u>Appendix G</u> - "Average Habitat Capability Unit Index as a Result of Planned Vegetation Treatments for the non-game MIS of goshawk is 100 percent. This is not affected by treatment activity because treatment guidelines will be followed." (LRMP, p. G-1).</p>

1998 Conservation Strategy	Uinta National Forest Plan
<p><i>Objective 1:</i> (Strategy, Page 6) Design a proactive approach to habitat management which will result in the long-term conservation and management of habitat for goshawk, its prey and other associated species.</p>	<p><u>Wildlife Goal No. 7</u> - "Maintain and develop suitable habitat for wildlife and for game and nongame fish populations by coordination with other resource uses. Develop specific improvement projects to maintain a viable population of existing resident and migratory invertebrate species. Improvement/degradation of fish and wildlife habitat as a result of project activities and the resultant change in populations of the Management Indicator Species (MIS) will be measured by the Habitat Capability Index displayed in Appendix G."</p> <p><i>Objective 7</i> - "Continue cooperation with State and other Federal agencies to establish specific management objectives for various fish and wildlife types on the Forest..." (LRMP, p. 3-46 to 3-47)</p> <p><u>Wildlife Goal No. 8</u> - "Maintain and improve habitat of management indicator species selected according to the following criteria (include endangered, threatened, and sensitive plants and animals identified on State and Federal lists): Species with special habitat needs that may be influenced significantly by planned management programs; species commonly hunted, fished, or trapped; and species where population changes are believed to indicate the effects of management activities on other species of a major biological community or water quality. Improvement/degradation of fish and wildlife habitat as a result of project activities and the resultant change in populations of the Management Indicator Species by the Habitat Capability Index displayed in Appendix G." (LRMP, p. 3-48)</p> <p><u>Wildlife Goal No. 9</u> - "Maintain proper emphasis to wildlife and fish resources in land management planning. Continue to protect threatened, endangered, and sensitive species and native game and nongame species. Introduce and maintain exotics where justified." (LRMP, p. 3-48)</p>
<p><i>Objective 2:</i> (Strategy, Page 6) Provide consistency in management of goshawk habitat on National Forest System lands in the state of Utah.</p>	<p><u>Wildlife Goal No. 3</u> - "Maintain cooperation with State, other Government agencies, environmental organizations, and special interest groups in wildlife and fisheries management."</p> <p><i>Objective 4</i> - "Maintain cooperation with State agencies in inventorying, protecting, managing, and planning for threatened, endangered, and sensitive species." (LRMP, p. 3-44 to 3-45)</p> <p><u>Wildlife Goal No. 7</u> - "Maintain and develop suitable habitat for wildlife and for game and nongame fish populations by coordination with other resource uses. Develop specific improvement projects to maintain a viable population of existing resident and migratory invertebrate species. Improvement/degradation of fish and wildlife habitat as a result of project activities and the resultant change in populations of the Management Indicator Species (MIS) will be measured by the Habitat Capability Index displayed in Appendix G."</p> <p><i>Objective 7</i> - "Continue cooperation with State and other Federal agencies to establish specific management objectives for various fish and wildlife types on the Forest..." (LRMP, p. 3-46 to 3-47)</p>

b) Comparison of Utah Conservation Strategy Desired Habitat Conditions with Current Forest Plan Direction

1998 Conservation Strategy	Uinta National Forest Plan
<p>1) Diverse forest cover types with strong representation of early seral tree species dominant the landscape. (Strategy, Page 6)</p>	<p><u>Forest Policy</u>: "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...habitat of threatened, endangered, and sensitive species." (LRMP, p. 3-153)</p> <p><u>Management Practice</u>: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats."</p> <p><i>Standard Wlf-2</i> - "For species enrichment require at least 10 percent of the land area to be maintained in each of the following successional stages: grass, forb, shrub, sapling, pole, mature and old growth..."</p> <p>"Special habitats will be managed as directed in operational documents..." (LRMP, p. 3-153)</p>
<p>2) High quality habitat patches that are no more than 60 miles apart, preferably less than 20 miles apart, exist throughout landscapes (connected habitat). (Strategy, Page 6)</p>	<p><u>Management Practice</u>: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats."</p> <p><i>Standard Wlf-2</i> - "For species enrichment require at least 10 percent of the land area to be maintained in each of the following successional stages: grass, forb, shrub, sapling, pole, mature and old growth. Management units will center on landtype association photointerpretive points."</p> <p>"Special habitats will be managed as directed in operational documents..." (LRMP, p. 3-153)</p>
<p>3) Forested landscapes have 40% of the area dominated by large trees, well distributed. Large trees are defined relative to the average for the cover type and site potential. (Strategy, Page 6)</p>	<p><u>Management Practice</u>: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats."</p> <p><i>Standard Wlf-2</i> - "For species enrichment require at least 10 percent of the land area to be maintained in each of the following successional stages: grass, forb, shrub, sapling, pole, mature and old growth. Management units will center on landtype association photointerpretive points."</p> <p>"Special habitats will be managed as directed in operational documents..." (LRMP, p. 3-153)</p>

1998 Conservation Strategy	Uinta National Forest Plan
<p>4) Habitats for prey and other associated species are present to meet needs as described by Reynolds et al. 1992 and Graham et al. 1998, in press (i.e., snags, down woody, cover, etc.) (Strategy, Page 6)</p>	<p><u>Forest Policy:</u> "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...habitat of threatened, endangered, and sensitive species."</p> <p><u>Management Practice:</u> "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats."</p> <p><i>Standard Wlf-2</i> - "For species enrichment require at least 10 percent of the land area to be maintained in each of the following successional stages: grass, forb, shrub, sapling, pole, mature and old growth. Management units will center on landtype association photointerpretive points."</p> <p>"Special habitats will be managed as directed in operational documents..." (LRMP, p. 3-153)</p>
<p>5) A variety of structural stages as recommended by Reynolds et al. 1992 are present. (Strategy, Page 6)</p>	<p><u>Forest Policy:</u> "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...habitat of threatened, endangered, and sensitive species."</p> <p><u>Management Practice:</u> "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats."</p> <p><i>Standard Wlf-2</i> - "For species enrichment require at least 10 percent of the land area to be maintained in each of the following successional stages: grass, forb, shrub, sapling, pole, mature and old growth. Management units will center on landtype association photointerpretive points."</p> <p>"Special habitats will be managed as directed in operational documents..." (LRMP, p. 3-153)</p>

c) Comparison of the Utah Conservation Strategy Project Stipulations with Current Forest Plan Management Direction, Standards and Guidelines.

1998 Conservation Strategy	Uinta National Forest Plan
<p><u>Down logs and tons of woody debris per acre:</u> (Strategy, Page 7)</p> <p>---Ponderosa Pine - at least 3 large downed logs per acre (greater than or equal to 12 inch diameter mid-point, greater than or equal to 8 feet long); 5-7 tons of woody debris per acre.</p> <p>---Mixed species and spruce-fir - at least 5 large downed logs per acre (greater than or equal to 12 inch diameter mid-point, greater than or equal to 8 feet long); 10-15 tons of woody debris per acre.</p>	<p><u>Down logs and woody debris per acre:</u></p> <p>The LRMP does not specifically address down logs and woody debris. On page 3-153, the LRMP describes the Forest Policy for wildlife management: "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...old growth timber, and habitat of threatened, endangered, and sensitive species."</p> <p>On the same page, the LRMP also states: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats." Standard Wlf-2 on this page states "For species enrichment require at least 10 percent of the land area to be maintained in...old growth. Special habitats will be managed as directed in operational documents... "</p> <p>The Glossary in the FEIS for the LRMP defines Old Growth Habitat (p. F-24) as "habitat for certain wildlife that is characterized by overmature coniferous Forest stands with large snags and decaying logs."</p>
<p><u>Snags/acre:</u> (Strategy, Page 7)</p> <p>---Ponderosa pine - at least 2 large snags per acre (greater than or equal to 18 inch dbh, greater than or equal to 30 feet tall) .</p> <p>---Mixed species and spruce-fir - at least 3 large snags (greater than or equal to 18 inch dbh, greater than or equal to 30 feet tall) .</p>	<p><u>Snags/acre:</u></p> <p>On page 3-153, the LRMP describes the Forest Policy for wildlife management: "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...snags, aquatic systems, old growth timber, and habitat of threatened, endangered, and sensitive species."</p> <p>On the same page, the LRMP also states: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats." Standard Wlf-2 on this page states "For species enrichment require at least 10 percent of the land area to be maintained in...old growth. Special habitats will be managed as directed in operational documents... " Standard ST-2 on page 3-124 states "Give priority to removal of high-risk timber with emphasis on spruce stands. Harvest other Forest products as silviculturally desirable. Exception: Leave snags needed for wildlife habitat."</p> <p>The Glossary in the FEIS for the LRMP defines Old Growth Habitat (p. F-24) as "Habitat for certain wildlife that is characterized by overmature coniferous Forest stands with large snags and decaying logs."</p>

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<p><u>Canopy Cover</u> (Strategy, Page 7)</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 15%;">mid-age</th> <th style="width: 15%;">mature</th> <th style="width: 15%;">old</th> </tr> </thead> <tbody> <tr> <td>Nest stand all forest types</td> <td>NA</td> <td>50-70%</td> <td>50-70%</td> </tr> <tr> <td colspan="4">Home Range</td> </tr> <tr> <td>Ponderosa Pine</td> <td>40-60%</td> <td>40-50+%</td> <td>40-50+%</td> </tr> <tr> <td>Mixed species</td> <td>40-60+%</td> <td>50-60+%</td> <td>60+%</td> </tr> <tr> <td>Spruce-fir</td> <td>40-60+%</td> <td>60-70+%</td> <td>60-70+%</td> </tr> </tbody> </table>		mid-age	mature	old	Nest stand all forest types	NA	50-70%	50-70%	Home Range				Ponderosa Pine	40-60%	40-50+%	40-50+%	Mixed species	40-60+%	50-60+%	60+%	Spruce-fir	40-60+%	60-70+%	60-70+%	<p>The LRMP does not specifically address canopy cover. On page 3-153 the Plan does state "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats." Under Standard Wlf-2 on this page the LRMP also states "Special habitats will be managed as directed in operational documents..."</p>																																																												
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d) Comparison of Utah Conservation Strategy requirements with Current Forest Plan Management Areas and Prescriptions

There is nothing in the Utah Conservation Strategy which directs the establishment of specific management areas or specific management prescriptions. All requirements in the Utah Conservation Strategy would be covered by forest-wide direction, standards and guidelines.

e) Comparison of Utah Conservation Strategy requirements with Current Forest Plan determination of lands not suited for timber production.

1998 Conservation Strategy	Uinta National Forest Plan
Nothing in the Strategy would affect this decision point. The Strategy does not preclude the use of mechanical treatments to manipulate vegetation to meet resource objectives.	<p>Table B-2 (LRMP, Page B-4)</p> <p>9. Unsuitable forest land 302.3 M-Acres 10. Total suitable forest land 20.9 M-Acres</p> <p>Standard ST-4 states: "Cut or remove timber primarily to enhance or protect other resource values or as required for public safety or insect and disease control." (LRMP, p. 3-124)</p>

f) Comparison of Utah Conservation Strategy Monitoring and Evaluation Requirements with Current Forest Plan Requirements

Strategy (Strategy, Pages 9 thru 11)

Habitat Monitoring

The Strategy incorporates two types of monitoring: 1) tracking changes in goshawk habitat over time; and 2) evaluating implementation, and effectiveness of the Strategy in maintaining or improving goshawk habitat. Both types of monitoring will occur to some degree at each planning scale (project, Forest, and statewide).

1. Tracking changes in goshawk habitat over time

This type of monitoring will occur on State and federal lands, statewide. Each Forest will monitor its forested landscapes for the attributes described in the desired habitat condition (DHC) statements provided earlier (early seral tree species, habitat connectivity, large trees, stand level characteristics such as snags and down woody debris, and a variety of vegetative structural stages). At the forest level this is accomplished by identifying changes in habitat caused by management activities or natural events. When conditions are trending away from DHCs, appropriate corrective actions will be developed and implemented. Results of forest-level monitoring will also be aggregated to a central repository at the state level in order to monitor quality and connectivity of statewide habitat. Statewide assessments will also be completed during programmatic planning activities such as Land and Resource Management Plan revisions.

2. Implementation and effectiveness monitoring

Monitoring will be conducted to verify that projects are properly implementing the Strategy, and that they are effective in creating desired habitat conditions for the goshawk and its prey. Monitoring will be part of the design of every project affecting goshawk habitat. Time periods and indicators for monitoring will vary depending upon the purpose of the project; they will be documented in individual project records. At the Forest and statewide levels, monitoring will track the net change in availability and connectivity of high-value goshawk habitat. Monitoring will be reviewed annually at the state level to determine if the Strategy is being successfully implemented or if changes are needed.

An additional indication of the Strategy’s effectiveness is provided by territory occupancy (see next section).

Population Monitoring

Concurrent with habitat monitoring, Forests will monitor goshawk territory occupancy. Data will be collected and analyzed at the Forest level and shared with the Utah Division of Wildlife Resources for aggregation to larger scales, including the State. A territory is considered occupied if evidence of goshawk use is present. Nesting does not need to occur for a territory to be occupied. Each agency will be responsible for maintaining and updating its respective population databases, and coordinating findings annually.

This is the minimum level of population monitoring required under the Strategy. Such information will help ensure that there is reproductive potential, in the form of adult birds present on every management unit. Occupancy data are strongly influenced by the level of survey, monitoring effort, and observer training and experience. Therefore, when conducting population monitoring, managers should be prepared to invest sufficient field effort to obtain reliable results.

However, occupancy data have limitations which should be considered during interpretation. Because it does not indicate if reproduction is actually occurring, occupancy is not sensitive to the early stages of habitat decline and may not detect population sinks (areas where goshawks are either nesting unsuccessfully or failing to initiate nesting). Whenever possible, occupancy data should be supplemented with nest productivity data in order to provide additional information on habitat quality.

Monitoring and Evaluation Procedures for Populations

Population monitoring will be conducted annually using a random sample of at least 20 territories, or 50% of all known territories, whichever is greater. If fewer than 20 territories are known, monitor all of them. Once a territory is identified, it always remains in the pool of known territories. New territories will be included in the sample as they are located and could be analyzed separately.

If monitoring reveals three consecutive years of a 20% or greater decline in territory occupancy, further evaluation must occur to determine the cause and appropriate corrective action. This evaluation would be conducted by an interagency team. Corrective actions will be determined in part based on the scale at which the populations are declining.

There must be a strong commitment to monitoring both habitat and populations. Failure to make this commitment could result in underestimation of territory occupancy, which could unnecessarily limit management activities. Furthermore, it will result in insufficient information to make necessary management changes.

Management Responses to Suspected Occupancy Declines

Declining occupancy at the landscape level requires review; it does not necessarily mean that population viability is at risk. If declines at the landscape level occur, only those activities that would benefit habitat for the goshawk at the landscape area should be implemented. If that is not possible in the landscape, habitat should be developed or maintained in adjacent areas.

Declining occupancy in multiple landscapes is serious. Such declines suggest a widespread or systematic problem that could relate to management strategies rather than individual projects. Such declines indicate a need to evaluate conditions over a multiple-landscape scale and develop corrective or compensatory strategies.

Declining occupancy at the forest level could affect findings in project-level Biological Evaluations (BEs) and require review of the Habitat Strategy, Forest or Resource Management Plan direction, and standards and guidelines. Forests should identify the most likely cause of the decline and determine actions to reverse the decline in trend. The Habitat Strategy would only be modified if review indicated that the existing

strategy had been fully implemented, and yet habitat was still implicated in the decline. When occupancy is declining at the forest level, projects should be specifically designed to enhance habitat rather than to mitigate or be neutral in their effects to goshawks.

Uinta National Forest Plan

The section of the Uinta National Forest Plan containing the Monitoring and evaluation requirements was amended September 27, 1993. This amendment replaced the monitoring requirements in the 1984 Forest Plan. The following monitoring requirements are from pages 4-2 through 4-19 of the amended Forest Plan.

ACTIVITIES, EFFECTS AND RESOURCES TO BE MEASURED	MONITORING METHOD	PRECISION/RELIABILITY	MEASURE-MENT FREQUENCY	REPORT-ING PERIOD	VARIATION WHICH WOULD CAUSE FURTHER EVALUATION AND/OR CHANGE IN MANAGEMENT DIRECTION
Management Indicators					
Goshawk [Old Growth (Douglas-fir, mixed conifer, and aspen)]	Vegetation data base GIS	M/M	Annually and as site-disturbing acts are analyzed		10% decline of old growth conifer or aspen acreage
c. Fuel management (inventory within acceptable level of risk)	Photo comparison on-the-ground; fuel inventory and compartment exams	H/M	Annually		+20% of Regional minimum fuel treatment standards.
d. Habitat Diversity	Vegetation Composition and age classification surveys, photos, maps	M/M	Annually		Significant deviation from standard and guideline specifications
	Satellite imagery; GIS inventories; fire reports	H/H	With Forest Plan revisions and following catastrophic events		> 10% change in a vegetation type acreage

g) Comparison of Utah Conservation Strategy recommended management activities/actions that should be implemented to maintain or improve habitat for goshawk with Current Forest Plan Direction

1998 Conservation Strategy	Uinta National Forest Plan
<p>There are a variety of management activities that could be employed to achieve DHC. These activities should be coordinated at the site-specific level by local land managers. However, there is a guideline that almost always applies:</p> <p>-Protect active nest areas (NAs) and their post-fledgling area (PFA) from disturbance during critical phases of reproduction. The recommended seasonal restriction from the Reynolds et al. 1992 is March 1 through September 30. Seasonal restrictions may vary from this recommendation when site-specific information justifies it.</p> <p>(Strategy, Page 11)</p>	<p>Standard ST-4 states: "Cut or remove timber primarily to enhance or protect other resource values or as required for public safety or insect and disease control." (LRMP, p. 3-124)</p> <p>On page 3-153, the LRMP describes the Forest Policy for wildlife management: "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...snags, aquatic systems, old growth timber, and habitat of threatened, endangered, and sensitive species."</p> <p>On the same page, the LRMP also states: "Encourage a diversity of wildlife habitat and maintenance of sensitive and unique habitats." Standard Wlf-2 on this page states "For species enrichment require at least 10 percent of the land area to be maintained in...old growth. Special habitats will be managed as directed in operational documents..."</p>

V. Summary and conclusions

Implementation of the Utah Conservation Strategy provides reasonable assurance that each National Forest will contribute to the maintenance of high-value, connected goshawk habitat throughout the State of Utah sufficient to promote species viability. The question evaluated by this SIR is the need to amend the existing forest plan in order to apply the recommendations of the Utah Conservation Strategy across the planning area. Section IV of this report compares the recommendations of the Strategy with the six decisions of the forest plan.

The following conclusions are reached as a result of the comparisons:

1. Do forest-wide goals and objectives in the current plan embody the spirit and intent of the goals and objectives found in the Utah Conservation Strategy, and to what extent do they complement or conflict with each other in achieving sustainable goshawk habitat?

A comparison of the goals and objectives in both documents shows a strong intent to maintain sufficient habitat to ensure viability of the northern goshawk. Because the goshawk is a classified (Region 4 sensitive) species, the current forest plan requires maintenance or enhancement of its status through habitat improvement. In addition, the status of the goshawk as a management indicator species in the Uinta National Forest Plan requires that sufficient habitat be maintained to protect viability of the species. This is also the specific intent of the Utah Conservation Strategy, demonstrating good alignment between the two documents.

There is no need for additional goals and objectives in the current forest plan to ensure that the Uinta National Forest contributes to the maintenance of high-value, connected goshawk habitat throughout the State of Utah. Though current plan goals and objectives dealing with goshawk are adequate, statements concerning goshawk, MIS and sensitive species could be updated and clarified through the amendment process or through the Forest Plan revision. The Forest plan revision is projected to be completed in 2001.

2. To what extent do the forest-wide standards in the current forest plan encourage, prohibit or have a neutral effect on implementation of the Utah Conservation Strategy?

and

3. To what extent do the forest-wide guidelines in the current forest plan encourage, prohibit or have a neutral effect on implementation of the Utah Conservation Strategy?

The Uinta National Forest Plan does not differentiate between standards and guidelines. Therefore they will be discussed together. In addition, the Uinta Forest Plan refers to management practices and Forest policy in a manner similar to standards and guidelines.

Diversity

The Utah Conservation Strategy emphasizes the need to maintain diversity of forest cover types. Similarly the Uinta National Forest plan emphasizes the importance of diversity on areas that are dominated by forested ecosystems. The plan gives special emphasis on maintaining habitat diversity (LRMP, p. 3-153).

Habitat Connectivity

The Utah Conservation Strategy emphasizes the need to have high-quality habitat patches not more than 60 miles apart (preferably less than 20 miles apart) throughout the landscape. This is important to maintain connectivity of habitat. The Plan, though not addressing connectivity directly, indicates in direction statements that habitat diversity will be maximized giving special emphasis to habitat of threatened, endangered, and sensitive species (LRMP, p. 3-153). In order to maximize habitat diversity, connectivity of habitat would be required.

Habitat connectivity is not only important within a planning area, but also with adjacent National Forest lands and lands under other jurisdictions. The Uinta LRMP clearly describes intent to coordinate habitat management activities through the following goals and objectives:

Wildlife Goal No. 3 - "Maintain cooperation with State, other Government agencies, environmental organizations, and special interest groups in wildlife and fisheries management."

Objective 4 - "Maintain cooperation with State agencies in inventorying, protecting, managing, and planning for threatened, endangered, and sensitive species." (LRMP, p. 3-44 to 3-45)

The basis for accomplishing this LRMP direction would be use of the best scientific information available at the time of an analysis. Presently, for the goshawk in Utah, this would be the Utah Conservation Strategy and Graham et al. 1998 (in press) publication. Though it is believed that current plan direction is adequate to deal with habitat connectivity, additional guidance on how to assess habitat connectivity for goshawks could be added through the amendment process.

Structural Diversity, Including Having 40% of the Landscape Area in Large Trees

The Strategy requires structural diversity in forest types, including sustaining large trees on approximately 40% of the forested landscapes. The Uinta National Forest Plan addresses structural diversity, but is less stringent. The Uinta Forest Plan requires at least 10% mature and 10% old growth (LRMP, p. 3-153). This translates to a requirement of having at least 20% in large trees. Considering the minimum percentages required in other structural stages, the 40% requirement in the Strategy can be met under existing Uinta Forest Plan direction.

In addition, the Uinta National Forest Plan requires that up to 10% of the land area be managed as old growth. The Strategy requirement for 20% old forest in the 40% large tree component represents a long range goal for achieving quality habitat. The 20% requirement in the Strategy could be met without violating any Uinta Forest Plan direction.

The Strategy requires at least 10% of ponderosa pine, mixed species and spruce/fir types in grass/forb/shrub and at least 10% in seedling/sapling structural classes. This is identical to the Uinta Forest Plan requirement found on page 3-153.

The Strategy requires at least 20% of ponderosa pine, mixed species and spruce/fir types in young forest structural stage, at least 20% in mid-age forest structural stage, and at least 20% of mature forest. The Uinta National Forest Plan is less stringent, requiring at least 10% pole and 10% mature (LRMP, p. 3-153). Considering the minimum percentages the Forest Plan requires in the various structural stages, the requirements for 20% mature, mid-age and young forest could be met without violating any Uinta Forest Plan direction.

"Old forest" in the Strategy is not equivalent to "old growth" as defined in the Plan. The "old forest" structural stage represents a size and age class of trees that dominate the overstory. "Old growth" forests are ecosystems, not just a size class structural stage. "Old growth" encompasses later stages of stand development that typically differ from earlier stages in a variety of characteristics; these may include tree size, accumulation of large dead woody material, number of canopy layers, species composition, and ecosystem function. "Old growth" would typically occur in the mid-age to oldest part of the Strategy's "old forest" structural class. In other words, all of this class is not "old growth."

The current direction and standards and guidelines meet the intent of these strategy requirements and do not prohibit achievement of habitat diversity or sustaining large trees on the landscape. In addition, the guideline for 10% mature and 10% old growth in the Forest Plan does not prohibit retention of additional large trees to meet resource objectives. This is particularly true for species such as the goshawk, where forest plan direction states "Special habitats will be managed as directed in operational documents..." The Strategy would be considered an "operational document". The defined requirements in the strategy constrict the Plan's operating "sideboards" as defined in current management direction; that is, structural diversity requirements defined in the strategy provide clear sideboards on how this aspect of wildlife habitat diversity will now be achieved forest-wide.

Age of Old Forest

The Strategy refers to the *mid-age* of old forest as being 200+ years for ponderosa pine, mixed conifer and spruce/fir forests. The Strategy does not define the age of old aspen or lodgepole forests. While the Uinta Forest Plan does not prescribe any specific ages for old forest, it does state that "special habitats will be managed as directed in operational documents (LRMP, p. 3-153). Though current plan direction is adequate to allow these ages to be realized, the age of old forest could be included in the Forest Plan through amendment or the Forest Plan revision.

Snags and Down Woody Material

The Utah Conservation Strategy provides requirements for management of prey habitat such as snags and down woody material. Likewise, the Uinta National Forest Plan includes direction which will maintain habitat for prey species. Specifically, the forest plan includes direction to maintain special habitats such as snags. Though the forest plan does not prescribe a specific number of snags that must be maintained, it does require managers to "leave snags needed for wildlife habitat" (LRMP, p. 3-124 and 3-153). The requirements in the Utah Conservation Strategy can be met without affecting other resources or outputs. Similarly, the Strategy contains requirements regarding retention of down woody debris and cover to serve as habitat for prey. Though the Uinta

Forest Plan does not contain specific minimum requirements regarding maintenance of down woody material, it also does not prohibit this. The Strategy requirements for down woody debris can be met without contradicting any Forest Plan direction and without affecting other resources or outputs. However, the defined requirements in the Strategy constrict the current Plan's operating "sideboards". That is, the snag and down woody material requirements defined in the strategy provide clear sideboards on how this aspect of wildlife habitat diversity will now be achieved forest-wide.

Canopy Cover

The Strategy outlines specific canopy cover requirements on page 7. The Forest Plan, though recognizing the need to provide wildlife habitat diversity, does not specifically define any standards and guidelines concerning canopy cover. As with snags, using the Strategy defined canopy cover would be consistent with plan direction to provide wildlife habitat diversity. However, the defined requirements in the Strategy constrict the current Plan's operating "sideboards". That is, canopy cover requirements defined in the Strategy provide clear sideboards on how this aspect of wildlife habitat diversity will now be achieved forest-wide.

Management Activities/Actions that Should be Implemented

The Utah Conservation Strategy states that "there are a variety of management activities that could be employed to achieve DHC. These activities should be coordinated at site-specific level by local land managers." Likewise the Uinta National Forest Plan provides direction to "cut or remove timber primarily to enhance or protect other resource values or as required for public safety or insect and disease control." (LRMP, p. 3-124).

The Strategy requires that managers "protect active nests and their post-fledgling area (PFA) from disturbance during critical phases on reproduction. The recommended seasonal restriction from the Reynolds et al. 1992 is March 1 through September 30. Seasonal restrictions may vary from this recommendation when site-specific information justifies it." The Uinta National Forest Plan provides direction to "Manage the Forest ecosystem to maintain vegetation diversity, providing for a large variety of species. Give special emphasis to...habitat of threatened, endangered, and sensitive species." The Uinta Forest Plan requires that "Special habitats will be managed as directed in operational documents..." To comply with this direction, active nests and post-fledgling areas associated with a specific project would be protected as outlined in the project Biological Evaluation.

Conclusions for Standards and Guidelines

The Reynolds et al. recommendations (the foundation of the Strategy) were developed for the Southwestern Region (Region 3) of the Forest Service. On October 13, 1992 the Intermountain (R-4) Regional Forester sent a memo to all Forest Supervisors stating that "Forests should use the Scientific Committee's recommendations as important new information to be considered along with other goshawk and ecosystem management information that may be available for their specific habitat types."

As recommended by the Regional Forester, the Uinta National Forest has been drawing from the intent of the Reynolds et al. recommendations when designing projects involving goshawk habitat since 1992. Drawing from the intent of these recommendations during project design was intended to be in effect until such time that a strategy was developed specifically for habitats in Intermountain Region (Region 4).

Current forest plan direction, standards, and guidelines do not prohibit adherence to Strategy stipulations at the project level; Strategy requirements are consistent with current forest plan direction. The guideline for 10% old growth in the Forest Plan does not prohibit retention of additional large trees on a site-specific basis to meet project objectives. This is particularly true for projects involving Forest Plan MIS species such as the goshawk where forest-wide direction requires us to "manage habitat for viable populations of all existing vertebrate

wildlife species". The Plan clearly intended for this to be accomplished through the management of habitat for MIS species.

Moreover, management of habitat to maintain viable populations is founded in federal regulation (CFR 219.19). This requirement must be accomplished. Thus, at the project level, use of the Reynolds et al. recommendations is consistent with the Plan.

Strategy requirements related to diversity and management activities/actions are consistent with current Plan direction. Moreover, they do not alter the Plan's vision, and do not change operational sideboards. Any adjustments in terminology to improve clarity of management direction can be accomplished through amendment or during forest plan revision efforts presently under way. Revision of the Forest Plan is projected to be completed in 2001.

Strategy requirements related to structural diversity (specifically 20% old forest, 20% mature forest, 20% mid-aged forest, and 20% young forest), snags, down woody material, age, canopy cover, and habitat connectivity are consistent with Plan direction when applied at the project level (a small area of the total Forest). However, because implementing the Strategy requires application of its requirements across *all forested acres in the planning area* (not just an individual project area), the vision for the structural distribution of forest on landscapes has changed in favor of greater retention of old forest. Also, although the specific snag, down woody material, and age requirements in the Strategy are consistent with the requirements in the Plan insofar as project level application goes, the Strategy requirement has changed the operational sideboards a deciding officer has to work within. In potential goshawk habitat areas presently described in the strategy, the minimum snag, down woody material and age requirements are now specified. A line officer can no longer elect to provide for smaller or fewer snags or down woody material or provide for a younger aged forest. Similarly, though retention of the desired canopy cover described in the strategy is consistent with current plan direction to provide wildlife habitat diversity insofar as project level application goes, the requirements for canopy cover defined in the Strategy have changed the operational sideboards. These changes in vision and operational sideboards will require a forest plan amendment. Through the amendment process guidance should also be provided on how to assess habitat connectivity for the goshawk.

These amendments should account for the ecological differences in vegetation types (i.e., one landscape scale for assessment of attributes will not necessarily fit all vegetative communities) and the variability in productive potential of sites (i.e., some sites can produce larger trees than other sites, both within and among vegetative communities).

4. To what extent do current forest plan management areas and prescriptions permit or prohibit implementation of the Utah Conservation Strategy?

There is nothing in the Utah Conservation Strategy which directs the establishment of specific management areas or specific management prescriptions. Management of habitat for Forest Plan MIS species such as the goshawk is provided through forest-wide direction that applies to all management areas; it requires us to manage habitat for viable populations of all existing vertebrate wildlife species. Thus, the Plan prescribes management of habitat for the goshawk sufficient to maintain viable populations, other direction or standards notwithstanding. Meeting this Plan requirement is further assured through the project NEPA decision and associated Biological Evaluation.

Moreover, management of habitat to maintain viable populations is founded in federal regulation (CFR 219.19). This requirement must be accomplished.

5. Would implementation of the Utah Conservation Strategy affect the decision made in the Forest Plan for lands not suited for timber production?

The requirement to identify and make decisions for lands not suited for timber production is found in CFR. 219.14 (Timber resource land suitability). This requirement has been addressed in the Uinta National Forest Plan (see Appendix B). Under the Forest Plan, the suitable timber base is composed of lands that are economically efficient in meeting timber production and other resource goals. A balance is struck between conflicting interests that best meet needs of forest resources and those dependent on national forest timber. In the Forest Plan (see Appendix B), only 20,900 acres of the 323,200 acres of conifer and aspen forest on the Uinta was found to be suitable.

To determine whether the Strategy would affect the decision made in the Plan for lands not suited for timber production, the four factors found at CFR. 219.14 were assessed:

1. The land is not forest land as defined by the CFR.
The Strategy does not change forest land to non-forest land.
2. Technology is not available to assure timber production without irreversible resource damage.
The Strategy does not require actions that cause irreversible resource damage.
3. There is not reasonable assurance that such lands can be adequately restocked.
The Strategy does not require actions that affect ability to restock lands.
4. The land has withdrawn from timber production by act of Congress, the Secretary of Agriculture or the Chief of the Forest Service.
The Strategy does not withdraw lands from timber production.

Implementation of the Strategy would not change the decision concerning lands classified as not suited for timber production in the Uinta National Forest Plan.

6. Are current forest plan monitoring and evaluation requirements sufficient if the Utah Conservation Strategy is implemented?

The Strategy identifies the need to monitor and evaluate habitat, as well as population trends. It prescribes general methodology to accomplish the monitoring and actions if deficiencies are found. Likewise the current Uinta National Forest Plan outlines required monitoring and evaluation procedures for goshawk. Specifically, the forest plan monitors habitat diversity by surveying vegetative composition and age class. The Uinta Forest Plan, as amended, does not specifically require monitoring population trends for goshawk. However, it does not prohibit this and in fact, goshawk populations have been monitored for several years as part of ongoing Forest Plan monitoring.

While both the Strategy and the plan require monitoring, the Strategy clarifies that population trends and viability determinations will be made at the State rather than the Forest level. The Strategy reinforces the importance of population surveys at the Forest level so that each Forest(s) contribution to maintaining state-wide habitat can be identified. This is not contrary to the monitoring requirements in the Plan, which use population monitoring as a measure of habitat adequacy to sustain viable populations.

The Strategy outlines management response to suspected population declines at the landscape, multiple landscape and Forest level. The Plan states that we will evaluate when a decline is observed, but it does not describe management response to population declines at different landscape levels. Use of the Strategy's management response requirements is consistent with the Plan requirement for further evaluations and decisions to change management direction.

The Strategy's requirement to monitor populations has changed the operational sideboards a deciding officer has to work within. A line officer can no longer elect to only monitor habitat; populations must also be monitored. This change in operational sideboards will require a forest plan amendment.

VI. Determination of need to amend current Forest Plan

Based on the above comparisons, assessments, and conclusions, I have determined that implementation of the *Conservation Strategy and Agreement for the Management of Northern Goshawk Habitat in Utah* is consistent with the six decisions made in the existing Uinta National Forest Plan. However, Strategy requirements for structural diversity (specifically 20% old forest, 20% mature forest, 20% mid-aged forest, and 20% young forest) will change the "vision" of forested lands depicted in the Plan for the planning horizon (50+ years). In addition, specific Strategy requirements for monitoring goshawk populations, snags, down woody material, age, canopy cover, and habitat connectivity change the operational sideboards in the Plan. A forest plan amendment should be completed to address these subjects.

Significance of proposed forest plan amendments

1) Timing

Implementation of the Strategy at the project level is consistent with current forest plan direction for reasons previously described. However, Strategy recommendations change the long-term vision of forest structures. The Plan should be amended as soon as it is practical from a personnel and budget perspective.

2) Location and Scale

The proposed amendments would affect all forested acres within the planning area. This scale of affected area (planning area) considered over an entire planning horizon (50+ years) suggests a significant effect. However, the type of assessment needed to determine these effects is best handled during forest plan revision (projected to be completed in 2001).

Determination of the need for an immediate interim amendment to the Plan is based on the scale of disturbance activities anticipated, between now and when a revised plan is implemented, that may affect habitat for the goshawk. The Uinta National Forest treats less than 2,500 acres of timberland a year; in the 3 years remaining before projected completion of forest plan revision, that would represent less than 1 percent of total timberland on the Uinta National Forest. This is not considered a significant amount of the planning area. However, to preserve options for revision, an interim amendment should be completed that reflects the new "vision" for the forest and provides greater assurance of adequate monitoring, canopy cover, snag and down woody material retention, sufficient old forest tree ages, and provides clear guidance on how to assess habitat connectivity for the goshawk.

3) Goals, Objectives and Outputs

Based on discussion above there is no need to change Plan's goals and objectives except as needed to reflect the desire to have a forest with a greater old forest component. Updating terminology and clarifying other existing goals and objectives will occur during the amendment or through forest plan revision.

Of the outputs and services provided for under the current forest plan, the only one that was identified as a potential concern prior to forest plan revision was forest ASQ. There is no indication that other outputs and services provided for under the current plan (i.e., recreation, range forage, other wildlife habitat, etc.) would be noticeably affected by the proposed *interim* amendments prior to forest plan revision.

Based on reviews of annual harvest records on the Uinta National Forest, there is no indication that use of the Reynolds et al. recommendations from 1992 to 1998 has substantially changed the volume of timber outputs compared to outputs in the first part of the planning period (1991-2000). Also, ASQ is a *ceiling*, not a *requirement* in the Forest Plan.

We believe the proposed *interim* amendments would not result in a measurable change in outputs and services over the remainder of this planning period. Effects to outputs over the longer planning horizon (50+ years) are most appropriately evaluated, and adjustments made, during the revision process, when all resource factors are considered concurrently. Revision of the Forest Plan is projected to be completed in 2001.

4) *Management Prescriptions*

There is nothing in the Utah Conservation Strategy that directs establishment of specific management areas or specific management prescriptions. Management of habitat for Forest Plan MIS species such as the goshawk is provided through forest-wide direction that applies to all management areas; it is an inherent part of their associated prescriptions.

CONCLUSION

Interim amendments to the current Uinta National Forest Land and Resource Management Plan will be completed to address the recommended change in long-term vision of forest structure (a greater amount of old forest, mature forest, mid-aged forest and young forest); operational sideboards for snags, down woody material, old forest age, goshawk population monitoring, and canopy cover; and to provide guidance on how to assess habitat connectivity for the goshawk. Based on the finding that these *interim* amendments would not have a significant effect on the Forest Plan outputs and services prior to forest plan revision and that use of the Strategy at the project level is consistent with current Forest Plan direction, use of the strategy at the project level should continue during the amendment process. The *interim amendment* process is projected to be completed during the summer of 1999. These amendments will be incorporated into current forest plan direction, as well as into direction in the revised forest plan projected to be completed by 2001.

This assessment will be aggregated with the assessments of the other five National Forests in Utah, and delivered to the Regional Forester. The Regional Forester will review the findings of each Forest assessment to determine what immediate interim amendments to the Regional Guide and/or forest plans are warranted. Because the Strategy may affect current direction in all Forest plans in Utah, the process for completing *interim amendments* will be handled at the Regional level instead of by each individual Forest. The *interim amendments* will preserve options for the future that will be considered during the Forest Plan revision process conducted by all Forests in Utah over the next 2 to 4 years.

/s/ Peter W. Karp

PETER W. KARP

Forest Supervisor, Uinta National Forest

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