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Department of
Agriculture

Forest
Service

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File Code: 2670

Date: AUG 22 2007

Mr. Bryan Bird
Forest Programs Director
Forest Guardians
312 Montezuma, Suite A
Santa Fe, NM 87501

Dear Bryan:

Thank you for sharing your concerns (your letter dated July 9, 2007), stemming from the June 2007 public workshop on restoration of fire-adapted forests and northern goshawk habitat management. The workshops were designed to share information and hold discussions related to the Region's priority for restoration of fire-adapted ecosystems, forest plan requirements related to habitat management for northern goshawks and other wildlife species, and the Ecological Restoration Institute's (ERI) approach to ecological restoration. The workshop included a field trip where ample time was available to discuss issues and concerns. It is unfortunate that you could not attend the field trip and stay for the closing discussion. We believe your concerns may have been addressed.

In your letter, you did not describe a specific example related to large-scale tree clearing projects. However, we are not conducting "large-scale tree clearing projects." There may be instances when larger trees may need to be removed, including overstocking and fire hazards. Overstocked stands need thinning to allow groups of larger trees. They need to be thinned in such a way as to provide all sizes of trees, including large trees, over time. We would like to emphasize that we rarely, or likely will not, find reason to remove trees in the vegetative structural stage of old forests (VSS 6). Rather, removals are usually of individual trees.

The standards and guidelines in forest plans and the management recommendations describe 20 percent in each of the mature (VSS 5) and the old forest (VSS 6) stages and 60 percent in seral stages from grass/forb to mid-aged forests (VSS 1-4). Although large size tree classes are essential to the overall habitat condition, the literature recommends a diversity of habitats for the goshawk. Goshawks utilize all vegetation structural stages to carry out specific life functions, and they provide habitat for various prey species such as rabbits. The Forest Service is implementing the standards and guidelines in forest plans which include providing groups of old and mature trees, prescribed densities, opening sizes, VSS stages, and all habitat components described for goshawks.

The reference you made to Dr. Reynold's (Footnote #3) where you state his work documented significant populations declines is incorrect. Dr. Reynold's work reported annual variations in reproduction, which is a natural phenomenon with most wildlife species and did not document population trends either up or down (personal communications with Dr. Reynolds). Your statement that treatments that reduce canopy closure and tree density will likely cause declines in goshawk population size (Footnote #3) may only be true where the removal deviates

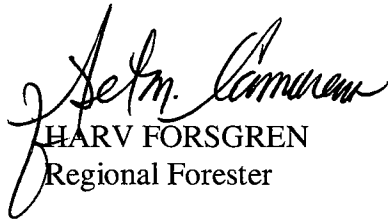


significantly from the standards and guidelines for the prescribed distribution of habitat components (VSS stages).

The Forest Service is not, nor is it, planning to weaken the goshawk standards and guidelines. There is no effort or planning to rewrite them. Habitat management through vegetation management is also consistent with the described recommendations in GTR-RM-217 and the Forest Plan amendment for northern goshawk.

During the workshops, a number of questions were raised and discussed. We have asked our staff and ERI to provide you with a summary of questions raised during the Albuquerque and Flagstaff workshops with answers to those questions (enclosed). Many are responsive to the concerns identified in your letter. Thanks for your participation in the workshops. If you or your organization would like to schedule a follow-up session to the workshop, please contact Jim Youtz, Forestry & Forest Health at (505)842-3428; Bobbi Barrera, Wildlife, Fish & Rare Plants at (505)842-3194; or Emily Irwin, Fire & Aviation Management at (505)842-3281. We will also consider a future workshop when we have implemented more of these restoration treatments and can view and discuss them on the ground.

Sincerely,



HARV FORSGREN
Regional Forester

Enclosures