

RECEIVED APR 28 1994

Sara J

TO: MARK ORME, TIMM KAMINSKY

FROM: SUSAN PATLA, GOSHAWK MONITOR

DATE: 19 APRIL 1994

SUBJECT: DRAFT STANDARDS AND GUIDELINES FOR TARGHEE REVISION
(Feb. 1994)

I have reviewed the draft guidelines and standards for the goshawk and would like to submit the following comments for your consideration. As you know, I have just recently received the Targhee NF GIS database in order to complete analysis of goshawk habitat at known nests on the forest. I would hope that this analysis when completed will be used to further refine and adjust plan guidelines for the goshawk. My comments below refer specifically to tables on page 40 (copy attached) of the draft standards and guidelines which are not labelled but which appear to define guidelines in Douglas fir and lodgepole pine habitats. I would also like to review any other existing guidelines for great gray owl, other hawks and owls, neotropical migrants, and other resident bird species. As I was told responses were to be submitted by April 21, I have hurried to complete these comments. I would be willing to further discuss and develop ideas presented here, so contact me if you would like to arrange a meeting or have questions. Please consider the following:

1. Number and size of areas: these reflect the southwestern (SW) regional goshawk guidelines. I suggest we view them as hypothetical until field tested; I will also submit specific refinements if my data analysis at known nest areas differs greatly from these. I would stress that the 180 acre nest area be contiguous and contain all known existing alternate nests. In certain territories, this may result in an area larger than 180 acres. The actual configuration of all areas should also be flexible and should reflect sound biological reasoning: ie, inclusion of riparian and high quality foraging habitat.
2. Size-class distribution: The PFA and foraging areas, compared to the SW guidelines, reflect an increase in proportions for "young forest" and "no forest" habitat and a decrease in the mid to mature/old growth proportions. The SW guidelines suggest grass/forb/shrub 10%, sap-seedlings 10%, young (5-12" DBH) 20%, mid-aged (12-18" DBH), mature (18-24" DBH), and old growth (24" + DBH) 20% each. There is no evidence I know of to suggest that mature forest (7" + DBH on the Targhee) should only be 40% of the PFA and foraging areas as these proposed guidelines suggest. In fact, in my initial analysis of nesting stands in the Centennial Mountains in undisturbed habitat for 8 nest sites the PFA averaged 80% mature timber. I suggest that you use 80% mature habitat for PFA and 60% for the foraging area to provide high quality habitat. The proposed guidelines are minimal as now proposed and may not support viable territories over the long term.
3. Canopy cover: the TNF guidelines do not contain any standards for canopy cover or tree density yet these factors have consistently been found important in goshawk nesting habitat. I suggest that you use 75-100% canopy cover for Douglas fir nest sites and PFA and 60-100% for the mature forest portions of the foraging area. Lodgepole might be 50-100% for nest

stands and PFA and slightly less for the foraging area. For Douglas fir goshawk nest stands I have counted an average of 142 trees/acre and for lodgepole 134 trees/acre. Density and canopy cover can of course be correlated so either measurement may be employed but I strongly suggest that you need to include some category here to indicate the degree of canopy closure and/or tree density. These characteristics are important for many other wildlife species besides the goshawk.

4. Rotation age: at the low end these are absolute minimums for the goshawk. I suggest raising them on both tables since minimums, as we well know, often become the reigning standards. Suggested rotation age in the SW is now 250 years.
5. Maximum created opening: the SW guidelines call for 2 acres in PFA and I think this should be the maximum for the TNF as well. The table at the bottom of page 40 lists 40 acres for both PFA and foraging areas!! Is this a misprint? I hope so. Even is some large openings exist now in LP habitat at known goshawk nests, I would like to point out that productivity at LP sites is low and occupancy often inconsistent. If you could create 40 acres of sage grasslands full of ground squirrels that might be helpful but the large clearcuts I have surveyed on the TNF show little potential for goshawk foraging. (In fact, I was surprised to see that 40 acre clearcuts are still being used in this plan revision at all.)
6. Snags: again numbers seem very minimal to me. In Douglas fir nest sites I have measured an average of over 100 snags/acre based on a 20 m radius habitat plot. How was this proposed number determined? What size snags does it refer to?
7. Reserve trees: in the SW plan for Spruce-fir the guidelines call for 1 group of 6 trees/.5 acre in both PFA and foraging ares or a total of 12/acre. Latest recommendations for the SW suggest 12 trees/ acre over 18" DBH which will never be cut.
8. Woody debris: this category is missing. I suggest that you include it at 10-20 t/ac. It is a very important component for small mammal populations and also an indicator of high quality mature forest habitat.
9. Open road density: this should be zero in nest area and PFA as well from my experience on the TNF.
10. The guidelines do not state when and where goshawk standards will be applied. Also these standards are not referred to in the section under "Raptor Nest Sites" p. 36. Are they only to be applied to known active nests in timber harvest areas? Since I have found goshawks reoccupying nests that have gone unused for 5-6 years, I suggest that they apply to all alternate nests found even if unoccupied when first discovered. I also suggest that the plan needs to manage for mature forest habitat capable of supporting goshawks and other forest species across the landscape, but I see no mechanism for doing this. Although the terms ecosystem management are used in the text at various times, I can find nothing in the actual standards and guidelines that implement ecosystem wide strategies. The need to maintain minimum patch size of quality mature and old growth forest, and habitat corridors has been known and researched for many years now. Unless these ideas are incorporated as

objectives and standards into the plan revision, I do not see how they will be achieved.

11. Where are the management guidelines for other sensitive species such as great gray owl? Surely this plan will not neglect the owl even more than the last one?

12. Raptor Nest Sites (p. 36): the last plan granted a very minimum of 10 acres around accipiter and buteo nests which I have stressed again and again as being inadequate. I did not think all standards would be eliminated completely however. Data do exist that can be incorporated here for the resident forest species. I strongly suggest you set specific standards to ensure conservation of historical nesting territories for all hawks and owls.

13. Monitoring of indicator species (p.7): I do not think that monitoring for only 3 consecutive years can allow you to evaluate climatic changes on population dynamics in most cases. After five years, I am just beginning to get enough data for some statistical analysis of the goshawk population. I suggest that you incorporate here more specifics on actual monitoring methods and data analysis. There is so much literature (much produced by the Forest Service) on monitoring now that could be used to lay out more specific guidelines.

14. Perhaps I missed it, but what percentage of old growth habitat will be retained across the forest? How many acres have been designated already? Will this be coordinated with goshawk management areas? I suggest that to retain old growth elements you put a slot limit on removing the old wolf trees on the forest: leave all living and dead trees that exceed 28" DBH.