

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE

Huron-Manistee National Forests  
Tawas Ranger District

REPLY TO: 1930 Environmental Analysis

March 6, 1979

SUBJECT: Threatened and Endangered Species Act

TO: Forest Supervisor, Huron-Manistee National Forests



As a line officer, it is my responsibility to recommend a mix of treatments to National Forest Land that, best meets the needs of the public, are economically sound, provide for long term benefits, enhance resources, protect existing resources and even protect resources that we're not even sure exist. While doing the above I am also directed to manage the public lands within the framework of numerous laws Congress has set forth to be followed.

More frequently than not, the district's recommended approach to management through Environmental Analysis has been disapproved based upon a specialists' review of the proposed action. In most cases, the specialist feels his or her particular area of concern isn't getting a fair shake in reference to a particular law or management principle. You may say the obvious answer to this problem is get earlier specialists input. This does not solve the problem. The decision on the "mix" is made by the Line Officer, whereby it is again reviewed by the specialists to see how well his input was followed. This is getting to be a time consuming and expensive procedure.

At present we on the Tawas District are having problems in satisfactorily establishing this suitable "mix" in implementing the Threatened and Endangered Species Act (Kirtland Warbler to be specific) on the district. This need not be frustrating or exceedingly complex if a few things regarding T & E species management were out in the open. Some are:

1. The KW recovery plan (of which we have a preliminary draft dated 1976), calls for certain land treatments specifically designed to encourage the preservation and reproduction of the Kirtland Warbler. These treatments will encompass 55,000 acres on the Huron Forest now or in the future.

WFO DISTRICT	
DATE REC	3-8-79
RANGER	
TWA	X
S.A. TECH	
S.P. TECH	
TSI-TECH	
ORA	
REC TECH	
POWER EGR	
ENGINEER	
INSPECTOR	
CLERK/TYPE	
BIOLOGIST	X
REVIEW	

Some of these treatments have not been analyzed as they do impact other resources both present and future. I feel that considering the magnitude and importance of the Recovery Plan that an objective environmental assessment is way over due.

For example, one hard and fast treatment for Kirtland Warbler is the necessity of prescribed burning as a preparatory measure to habitat development. Some of my questions are do we know what we are doing with the fire? What are we attempting to accomplish? What are the effects of fire on Grayling sand soils? What effect does fire have on long term site productivity? Is a fire history really necessary for Kirtland Warbler occupancy?

Another management axiom for KW management is to convert to large, (preferably 300 acres or more) jack pine mono types. This is contrary to many other guidelines and laws. Have the trade-offs been evaluated in respect to the effects this direction could have on I & DC problems, losses in utilizing the land for more productive species, losses in terms of species diversity related to "other" wildlife on the forest?

Several hundred acres of public lands are "closed" to use each year. When ever the public loses the use of "their" land some analysis must surely be made evaluating the action.

Other optimum management principles designed to enhance KW call for planting opposed to other more economical methods of reforestation. Where is the economic rationale for this? Where is the "best mix" that the Recovery Team is willing to accept?

As you see, the concerns above would have been evaluated in an Environmental Assessment of the KW Recovery Plan had that step been taken. I feel the lack of this has been contributory to most of our problems.

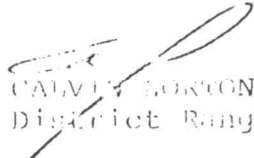
I propose we sit down in your office on March 15th, along with Horace, Bill and Dave Sorenson to determine:

1. The potential for getting the KW Recovery Plan and it's management principles objectively analyzed.
2. Produce interim direction to the field until such time the appropriate line and staff officers

"sign off" on an Environmental Assessment.

3. Look to the future as to how we will approach the Endangered Plants Act.

If this date is not satisfactory, give me a ring. I plan to invite a representative from Mio and Harrisville since we all share some potential habitat.

  
CALVIN GORDON  
District Ranger