



MARYLAND ORNITHOLOGICAL SOCIETY

February 1, 2024

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Forest Service, Pacific Northwest Region
1220 SW Third Ave.
Portland, OR 97204

To the Forest Service:

The Maryland Ornithological Society (MOS) has the pleasure of submitting the following comments on scoping for an amendment to the 1994 Northwest Forest Plan (NWFP). The lands subject to the NWFP include 17 national forests with a total of 24 million acres in northwestern California northward through Oregon and Washington State. Members of the MOS have visited national forests affected by the NWFP, as they contain important habitat for birds and other forms of wildlife.

MOS is a statewide nonprofit organization established in 1945 and devoted to the study, conservation and enjoyment of wild birds. Currently we have 15 chapters and approximately 2,000 members. Every year MOS members travel to federal lands throughout the United States on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor recreational activities.

Bird and Wildlife Habitat Values: The MOS has been participating in national forest resource management planning for 20 years. MOS members have visited many national forests on the ground. We have reviewed planning documents, and we have submitted comments. We participate because the lands in the National Forest System have outstanding values for bird habitat. The habitat is good for birds because the land is still wild.

Habitats for birds in the NWFP region are varied, from the moist habitats along the Pacific shoreline to the drier pine forests to the east of the Cascade Range and riparian habitats on rivers and creeks that flow through the area. MOS members treasure their visits to national forests such as the Siuslaw along the Oregon Coast with its Sitka spruce, to the Mount Hood

near Portland with forests of Douglas-fir, to the Fremont-Winema near Klamath Falls with its parklike stands of ponderosa pine.

The revised NWFP and EIS should list all ESA-listed species of birds and mammals found in the decision area and show critical habitat that has been designated for them. We are aware that critical habitat has been designated in the decision area for two ESA-listed bird species, namely the Marbled Murrelet and Northern Spotted Owl. We urge the Forest Service to consult the bird records shown in ebird.org, a website from the Cornell Lab of Ornithology, that draws on field observations by ornithologists and bird watchers.

Mammalian species of interest in the planning area include gray wolf, Pacific fisher, Pacific marten, black bear, elk and blacktail deer.

The old-growth forest also supports anadromous fish. Five species of salmon (chinook, coho, chum, pink, and sockeye) plus steelhead (sea-run rainbow trout) return to the rivers and creeks in the NWFP area to spawn. The national forests in Oregon and Washington provide approximately 50 percent of the spawning and rearing habitat for these fish. These sea-run fish become a food source for many species of birds and mammals.

Mature and Old-growth Forest: To support bird and wildlife habitat, the revised NWFP should protect remaining mature and old-growth forest, which were not equally protected by the initial policy. These areas are important habitat for species dependent on intact old-growth forest, such as Marbled Murrelet and Northern Spotted Owl. These forests face increasing threats from the impacts of climate change, such as fire, drought and insect damage.

Wildfire: The NWFP amendment should include clear steps to address severe wildfires. In the 30 years since the original NWFP, wildfires have grown greatly in size, strength and intensity and this alarming trend is likely to continue. The revised plan should provide for new strategies to provide greater resistance to fires and greater resilience afterwards. The Forest Service should consider using Indigenous cultural burning practices, where appropriate, in consultation with Tribal Nations.

Off-Highway Vehicles: In the NWFP amendment, the MOS recommends that off-highway vehicles (OHV) be restricted to routes already designated for their use and be barred from areas designated for wildlife habitat protection or for wilderness consideration. MOS members have seen the impacts of OHVs elsewhere on federal lands, where vehicles crossed and recrossed streams, flattening riparian vegetation and leaving engine fluids in the water.

The NWFP amendment should establish a process for reviewing existing OHV routes and identifying those that are creating impacts against bird and wildlife habitat. The impacts are problematic especially where OHVs travel in riparian habitat, where vehicles cross streams,

or where they travel in a streambed. Any such routes should be closed and rehabilitated to restore the damaged habitat. Standards for OHV routes should be included in the NWFP amendment.

Over-snow Vehicles: MOS recommends that snowmobiles and other over-snow vehicles (OSV) be restricted to designated routes and areas. The NWFP amendment should establish standards for such designations. It is well known that OSVs disturb wintering birds and mammals, creating stress and elevated energy consumption, which may lead them to leave their preferred wintering habitat.

Economic Values: Tourism based on the national forests is an ever-growing industry in the NWFP region. We believe that watchable wildlife, heritage tourism, and the economic benefits of unimpaired wild lands will prove to be more valuable and more sustainable than alternatives that would expand logging, OHV and OSV routes or development of minerals and fossil fuels. We favor preserving local natural resource-based economies and generations-old traditions in the West. With careful planning and execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.

Co-Stewardship: We urge the Forest Service to include direction in the final plan to foster collaboration between the Forest Service and Tribal Nations in the stewardship of their homelands. We are aware of the collaboration the Bureau of Land Management has enjoyed with the five tribes that proposed the Bears Ears National Monument in Utah. We hope to see that approach used in the NWFP amendment.

Thank you for considering our comments, and please include them in the official record.

Sincerely,

A handwritten signature in blue ink that reads "Robin G. Todd". The signature is written in a cursive, flowing style.

Robin G. Todd PhD, Conservation Chair
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