

Data Submitted (UTC 11): 4/20/2020 7:00:00 AM

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Title:

Comments: Please see the attached file for the comments of the Maryland Ornithological Society on the Nez Perce-Clearwater National Forest Plan Revision.

Maryland Ornithological Society

April 20, 2020

Submitted: via portal to: <https://cara.ecosystem-management.org/Public/CommentInput?project=44089>

RE: Nez Perce-Clearwater National Forest Plan Revision #

To Forest Service:

The Maryland Ornithological Society (MOS) appreciates the opportunity to comment on the Nez Perce-Clearwater National Forest Plan Revision. We find much to like in the four alternatives given, but take issue with parts of some. We support Recommended Wilderness Areas, as we believe that keeping them as they are is the optimal course for preserving our environmental treasures for future generations. All alternatives provide for some Recommended Wilderness Areas, except for Alternative X. Consequently, we oppose the portion of Alternative X stipulating no Recommended Wilderness Areas. We favor that portion of Alternative W as providing the most Recommended Wilderness Area, totaling 856,932 acres. Both W and Y lessen the amount of roads and trails open to motorized travel within the Recommended Wilderness areas. In general, we oppose any efforts that would shrink or eliminate Recommended Wilderness.

We support the full preservation of Great Burn/Hoodoo Roadless Area as Recommended Wilderness. As one of the largest roadless areas in the Lower 48 states, it is critical habitat for highly valued large, charismatic megafauna such as mountain goats, wolverines, lynx, and grizzly bears. The Great Burn also serves as a wildlife corridor connecting the Salmon-Selway ecosystem with the Glacier National Park-Bob Marshall ecosystem 1. We also support the East and West Meadow Creek as well as Mallard-Larkins as Recommended Wilderness areas. Meadow Creek links the Selway-Bitterroot and Frank Church-River of No Return wildernesses, and has important fish population. Mallard-Larkins contains important wildlife habitat and popular for primitive recreation. Preservation of these areas are critical to these valued wildlife species. Alternative Z provides for such protection of Meadow Creek and Mallard-Larkins.

1 Great Burn Conservation Alliance, The Great Burn Recommended Wilderness, <https://www.greatburn.org/the-great-burn-recommended-wilderness.html>

Our support of Wilderness is occasioned by the superb habitat that wilderness supplies for birds and other wildlife. According the eBird, an on-line database of bird distribution and abundance, 94 bird species have been recorded in the Nez Perce-Clearwater NF. These include desirable species such as Northern Goshawk, Northern Pygmy-Owl, Dusky Grouse, Calliope Hummingbird, and Evening Grosbeak 2. Our members have visited Nez Perce-Clearwater NF, in part, to admire its birdlife.

2 <https://ebird.org/hotspot/L912978>

We furthermore are very concerned at the allowance of greater over-snow motorized use envisioned by Alternative Z. Increased snowmobile traffic is contrary to the quiet enjoyment of outdoors. It would be especially inappropriate in the Great Burn/Hoodoo Roadless area. Illegal snowmobile use in the Great Burn/Hoodoo

Roadless Area has been implicated in the steep decline in numbers of mountain goats in the area 3. Such illegal behavior should not be legitimized. We request that the increased winter motorized use proposed in Alternative Z be withdrawn.

3 Bert Lindler, Snowmobilers may have killed mountain goats, Missoulian, March 30, 2020,
https://missoulian.com/opinion/letters/snowmobilers-may-have-killed-goats/article_c5dc8ce4-3802-5274-bb42-02846af4a8d6.html

MOS is not opposed to snowmobile use in principle. These vehicles have their uses, which we acknowledge. But we rely on land-managing agencies like BLM to advise us, through regulations and closures, where and when their use is not suitable because of potential damage to the land and to wildlife habitat. We want the agencies to place protection of the habitat as the highest priority. In general, snowmobiles and other off-road vehicles are incompatible with the quiet enjoyment of the outdoors.

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

Sincerely,
Kurt R. Schwarz
Conservation Chair
Maryland Ornithological Society