December 08, 2023

USDA-Flathead National Forest (FNF)

Swan Lake Ranger District

Attn: Jeff Durkin and Chris Dowling

200 Ranger Station Road

Bigfork, MT 59911

Re: Comments for Proposed Action for Rumbling Owl Fuels Reduction Project

**\*These comments are my own personal opinions and not that of the organization I work for or any collaborative group that I am a part of.**

I would like to commend the USFS on the level of public engagement to help form the Rumbling Owl Project as well as receive feedback. Public tours and meetings with the Southwestern Crown Collaborative and the Condon community prior to public scoping for this project help facilitate support and gather important feedback on any concerns that may exist, and I encourage the USFS to continue to utilize this model of public engagement and outreach for any future projects as well. There was also good communication with the local community about the public meeting on November 29th with the postcard mailing.

I am supportive of many aspects of the proposed project, including but not limited to aquatic restoration efforts, replacing undersized culverts, fixing the Barber Creek Road slump, road decommissioning, thinning in tree plantations, and the majority of fuels reduction treatments in the WUI.

While I am supportive of many aspects of the project and the majority of thinning treatments/units across the project area, I do have several concerns related to wildlife habitat and ungulate winter range values that often present conflicting values with fuels reduction treatments. While I understand the main goals of the overall project are to reduce fuels in some of the units to help prevent high severity and uncharacteristic wildfire in the future, I believe the USFS should consider adding a main goal/objective to maintain or promote future winter range values as part of the project, given that this project area is one of the most productive and concentrated areas of big-game winter range use in the entire Swan Valley.

The Holland Lake area (contained within the Rumbling Owl Project area) contains the largest contiguous patch of winter range habitat remaining in the Swan Valley bottom and runs west from nearly Highway 83 east up onto the Swan Front. This patch starts on its western end in Units 139/265 and continues through Units 140,138, 287, 137, 188, 251, 252, 253, 254, 134, 134, 135, 133, 132, 131, 130 and connects up to the Swan Range face on the eastern end in Unit 129. The other winter range throughout the Swan Valley has been fragmented from previous Plum Creek checkerboard ownership and logging practices, in addition to certain USFS timber harvest projects that have favored the fuels reduction of ladder fuels and less fire-resistant species such as spruce and fir. This has led to a decrease in large, connected patches of mature multi-storied forests at a landscape scale across the Swan Valley that offer the highest winter range values of hiding cover, thermal cover, and snow canopy intercept. The area just to the north of Holland Lake Road (Units listed above) contain a relatively intact patch of mature forest that is high quality winter range habitat and an invaluable big-game migration corridor of connectivity. With highly degraded winter range in Section 33 just to the north (ex-Plum Creek), and open fields/grasslands on the Gordon Ranch (private property) to the south creates a bottleneck in this narrow strip of habitat that funnels animals, particularly big-game, during the winter months and provides an invaluable east-west travel and migration corridor. These units are characterized by old-growth ponderosa pine and larch, with mature Douglas-fir in between. Any treatments that take the majority of mature Douglas-fir or open up the forest canopy by taking out too much of the Douglas-fir would be inappropriate and cause irreparable harm to wildlife connectivity and winter range values (thermal cover, snow canopy intercept, forage from arboreal lichens, etc). I strongly urge the USFS to consider a very thoughtful, light treatment in most of these units where the prescription would be to daylight around the old-growth legacy ponderosa/larch trees to a radius of approximately 20 foot crown spacing, but then leave the remainder of the forest intact to maintain current high-quality winter range values and habitat connectivity. This forest provides a great opportunity to showcase how to better protect these old-growth trees from future fire events, mimicking mixed-severity fire, while still maintaining winter range values. I have personally observed where previous similar forest stand conditions existed in the USFS Meadow/Smith Project area and nearly all the overstory and understory trees were cut, leaving just the old-growth legacy ponderosa/larch trees. While this treatment may have helped reduce wildfire risk and the chance of a high severity fire, it has completely degraded former high-quality winter range and during the peak of winter during deep snow depths, is now non-functional winter range as there is essentially no snow canopy intercept or thermal cover remaining. I don’t want to see the same mistake happen again in the Rumbling Owl Project area. Good examples of prior thoughtful USFS treatments that have left more ideal conditions for winter range values and hiding cover in similar forest stands can be found to the west and north of the Condon Ranger Station.

As a general suggestion for the majority of treatments, no matter the prescription, (improvement, commercial, shelterwood, seed tree cut) I highly suggest that the USFS consider leaving small, untreated patches of understory/overstory trees that can be utilized by big-game as hiding cover within more open post-treatment stands. As a general observation, the USFS doesn’t leave small patches (1/8 acre-1/4 acre) of hiding cover in more homogeneous stands of shelterwood or seed tree cuts, which leaves the forest largely devoid of any winter range values of hiding cover, snow canopy intercept (particularly in shelterwood cuts that leave mostly overstory larch). When USFS does leave a small clump of trees for hiding cover, it is often a ‘token leave clump’ within a larger unit that essentially is meaningless for wildlife. I encourage the USFS to consider leaving multiple small patches of hiding cover within each unit, or consider leaving untreated or higher-density tree strips within each unit that can still facilitate wildlife connectivity and travel through a unit during deep snow conditions. If there aren’t enough clumps or strips of hiding cover left in each unit, then they often act as a barrier or wall to wildlife travel during deep snow conditions and cuts off any use within each unit or access to the woody shrub forage components that may exist. In most treatments, utilizing variable density spacing that creates clumps/gaps is preferred over more homogeneous treatments where there is an overstory tree left every 20 feet with nothing in between.

I do think there is the opportunity to conduct heavier-handed roadside treatments that reduce tree densities and wildfire risk with shaded fuel breaks, followed by understory prescribed burns, similar to what was done along other portions of Holland Lake Road in previous USFS entries. There is an opportunity to do similar treatments along Holland Lake Road in Units 139, 137, and 135.

It should be noted that Units 139 (and possibly 140 & 265) contain some culturally modified trees. These should be identified and protected with any treatments that occur and indigenous tribes should be contacted and notified prior to any treatments to ensure any additional historical artifacts or values in these Units are not altered or destroyed (if this hasn’t been done already).

I am very disappointed that the large, prescribed burns on the face of the Swan Front were not kept in the proposal. Besides reducing the risk of uncharacteristic wildfire and reducing fuel loading to stands that have missed at least one fire return interval, there are many ecological benefits from prescribed burns. Without them, the Rumbling Owl Project doesn’t seem to have the same landscape scale ecological benefits. I understand these high elevation burns were omitted because there needs to be an amendment to the Forest Plan to allow for motorized aerial ignitions in the Swan Front Recommended Wilderness and encourage the USFS to work towards that amendment so that more high-elevation prescribed burns can occur on the Swan Front, either as part of this project, or in future projects.

The habitat along Holland Creek provides important hiding cover and east-west travel corridors for a variety of wildlife. For this reason, I suggest performing no treatment in Unit 137, as it provides an important crossroads of travel corridors and habitat where animals travel east-west along the creek, but also north-south to connect into the important east-west strip of contiguous high-quality winter range listed above. The forest in Unit 137 is characterized by old-growth ponderosa, larch, and Douglas-fir with many snags and large downed woody debris, providing a wide diversity of habitats for a variety of sensitive wildlife. There is also an active bald eagle nest within this Unit to be aware of. I suggest performing a buffer treatment instead along Holland Lake Road, similar to other previous treatments that can be found along Holland Lake Road.

Unit 141 was previously thinned in the last USFS entry, and I have to question the treatment of now turning it into a seed tree cut. Current conditions are a widely spaced density of trees, with little understory tree species and good fescue grasses that support elk forage. If anything, I could see doing a prescribed fire maintenance burn through that Unit, but otherwise seems like a healthy forest with no immediate need for treatment.

In Unit 250, there is generally low fuel loading, not much downed woody debris, and less of a woody shrub component than other Units within Section 33. I wonder if it would be better to focus prescribed burn efforts in other Units in the Section to help re-start decadent woody shrubs that exist throughout the section for benefit of big-game winter forage. There are good opportunities to run some ground fire through some of those eastern units (189 & 190 and the one in between with no treatment proposed) to restart those woody shrubs that are currently old and decadent. These are the most south or southwest facing aspects that have the highest winter range potential and have roads in between each one that would make lighting off a prescribed burn very efficient and cost-effective.

Unit 274 was treated in the last entry and there is a really nice composition of tree species and spacing in this forest now. I could understand running understory prescribed fire through this unit but disagree with any improvement cuts being necessary at the current time and recommend taking this out of the proposal.

I don’t understand why there is a temporary road in Unit 138? That seems unnecessary as it is very close to and parallel to Holland Lake Road. Please take that out of the proposal.

In addition to these specific concerns, I have several specific requests that I would like the USFS to consider as part of the Rumbling Owl Project:

I think that the USFS should close the spur road that comes off of Holland Lake Road (almost directly across from the Gordon Ranch road junction) and leads to the berm on the southern edge of Section 33. Currently it is open year-round to motorized vehicles, but that seems unnecessary.

I think the USFS should consider retiring the grazing lease that exists in the Rumbling Owl Project area, which has led to incredible amounts and spread of noxious weeds, including new infestations of houndstongue, orange hawkweed, and tansy. In addition, there are many miles on barbwire and woven wire fencing around the boundaries of this grazing lease that are nowhere near wildlife-friendly specifications.

In addition to the current, existing barbwire/woven wire fencing for this grazing lease, there are many old lines of fencing are not maintained and have fallen down and are tangled in fallen trees and brush that should be removed and are a concern for wildlife, people, and their pets. There are opportunities for partnering with other organizations like Backcountry Hunters and Anglers or the Rocky Mountain Elk Foundation to host volunteer efforts to help remove this fencing. There is also the potential to utilize MCC crews or Mission Mountain Youth crews to help with this.

Another suggestion that I have for all USFS projects in general is to always leave trees around gated road access points. I’ve seen too many examples around the Swan where the trees are cut next to gates, allowing motorized users to simply drive around the gates, illegally.

Thank you for your consideration,

Luke Lamar