

RE: Rumbling Owl Fuels Reduction Project

Hello Mr. Jeff Durkin,

Thank you for inviting the opportunity to comment on the Rumbling Owl project.

I support the culvert replacements, slump repair, and road decommissioning aspects of this project. I support the management of invasive species, and I would like to see aquatic-approved herbicides used in all settings where herbicides are necessary. I support the planting of western white pine where conditions are suitable.

I do not support the construction of any new roads for this project. Even if they are “temporary,” roads will have too many long-term consequences, including but not limited to soil compaction/erosion, habitat disruption/encroachment, and invasive plant dispersal. It is especially unacceptable that “some temporary roads would occur in riparian areas and stream crossings would be necessary.” If intended activities are not accessible with the existing road network, they should be conducted on foot with hand crews, or left alone.

During and after the project, all gates in the project area should be effective and monitored to deter illegal access. Trees and large rocks should also be retained along the edges of gates to ensure they are fully impassable by motorized users.

I support some light commercial and non-commercial thinning adjacent to roads/development, within plantations, and patchily throughout the WUI. I would like to see all harvest activities prioritize the lightest equipment possible, use only existing road networks, and take all precautions to prevent invasive species. In all cases, treatments should be patchy, leaving numerous clumps of untreated vegetation targeting connectivity, forage, and cover for diverse wildlife species.

I support following these patchy thinning activities with light, hand-ignited prescribed burns, with care to retain large woody debris/stumps. I support burning of some piles where necessary, as long as piles are kept small to avoid soil scarification. I support efforts to replant western white pine areas where it is ecologically suitable.

I support the avoidance of vegetation treatments in the riparian areas. The maps show many treatments right against the edge of many streams (236, 136, 137, etc.). I would like to see visual confirmation of riparian avoidance, and an even greater riparian-adjacent buffer in these areas (especially in the Holland Creek corridor, given the disruption to wildlife already caused by heavy vehicle travel along Holland Creek Road).

I do not support the clearcut/regeneration harvests, group selection, overstory removals, or related commercial treatments. Such large wood-free openings do not mimic natural processes, and they will pose serious consequences to whatever forest community that remains, including via soil warming, invasive plant dispersal, severed mycorrhizal networks, lost habitat for small animals, and much more. Such forest conversion and/or removal at this scale would be especially detrimental to the snow intercept, hiding cover, and lichen forage that trees in the project area provide to ungulates in winter. The entire project area is crucial ungulate winter range, and it is already fragmented by abusive logging practices under Plum Creek’s tenure. It is unacceptable to subject the project area to further loss with the large-scale, commercial treatments proposed.

I am also concerned with the activities proposed around old(er) growth trees – living and dead – and their associated habitat conditions. These older trees/snags should not be excessively manicured as isolated individuals, but recognized as keystones within an interconnected community of plants and animals. Culturally modified trees exist within the project area, and the Confederated Salish & Kootenai Tribes should be consulted to ensure their protection. The project area also contains the nest of a bald eagle (special status species) and vital habitat for the American goshawk (a Species

of Concern), and the impacts of treatment to these and other older-tree dependent species should be fully examined before treatments proceed.

Canceling the grazing lease and removing the associated wire fencing would be among the greatest ways to restore a resilient forest ecosystem in the project area. The fencing poses a hazard to animals of all kinds, and the cattle spread invasive plants and degrade riparian health. This has been worsening year after year after year, and this project represents an important opportunity to shift towards a restorative direction.

Thank you for considering these comments.

Best,

Rob Rich