

Rumbling Owl Comments
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I am submitting public comments on the Rumbling Owl Fuels Reduction Project Proposal (RO). Over the lifetime of the RO project of (up to a 10-year implementation schedule on FS-managed 5,400 acres). Combined with the proposed treatment of National Forest-managed lands in the Mid-Swan Landscape Restoration and WUI Project (15-year implementation schedule, 174,205 acres) in the Swan Valley there will be unacceptable levels of disturbance to recreation and wildlife. The combined total FS-managed lands treated in both of these projects totals 179,605 acres. Please see below specific concerns I have outlined.

Insufficient maps

The map in the Scoping document lacks detail and is very hard to understand without place names (creeks, lakes, trails, roads, and overstory). The general public has limited time to look at multiple maps to decipher where each treatment is recommended. The map key is so small in print that it is difficult to read. The maps should show current thermal, snow intercept and hiding cover as well as a comparative map that would show changes with the proposed treatments. Within this acreage I am concerned that ungulate species will be forced onto private land which apex predators will follow and get into trouble, relocated or euthanized.

Carbon Sequestration

The proposal states that “Condon has a Very High rating in all 4 assessment factors: Risk to Home, Wildfire Likelihood, Home Exposure, and Vulnerable Populations.” I do not see any commitment from the Swan Lake Ranger District (SLRD) to address how the project addresses carbon sequestration. This is also an emergency considering the rapid rate of how climate change is affecting the planet. “Intact forests are considered one of the best forms of natural carbon sequestration. On average, forests store twice as much carbon as they emit. Cedar forests grow in wetter areas in bogs, peat, and swamps where carbon can be captured and stored as carbonates” (<https://www.nationalgrid.com/stories/energy-explained/what-carbon-sequestration>). Cedar groves within the RO proposal should be left intact.

Forests which have never been logged provide important wildlife habitat and are a vital carbon sink. Tree-thinning projects significantly reduce the amount of carbon sequestered in forests, worsening climate change (<https://doi.org/10.1016/j.foreco.2018.07.029>) putting more emissions into the atmosphere than the fires they hope to prevent.

Public Comments

Both the RO proposal and the Mid-Swan Landscape Restoration and WUI Project offer limited public comment periods. The Mid-Swan Landscape Restoration and WUI Project offered only one comment period for a 15-year implementation schedule and the RO only offers a one-time public comment period for up to a 10-year implementation schedule. The public should have the ability to comment on a yearly basis for both projects. The public needs to see the effects of Year 1 to see what areas were opened up, which were not. And this should be done every year for both projects until completion.

Clearcuts

Why are clearcuts necessary? There should be NO clearcuts in this project proposal. Many of the former Plum Creek Lands in the Swan Valley that have been transferred to the Forest Service to manage were clearcut and are infested with invasive species, including spotted knapweed, houndstongue, and Canada thistle that continue to spread. Restoration and rehabilitation are needed in these damaged areas.

Clearcuts the Forest Service is increasingly prescribing for our public forests, as though they will regenerate, or not, depending on the degree of warming, will likely not do quickly enough in the brief window of opportunity we have warming around. These areas will be effectively deforested until the trees are big enough to capture the same amount of carbon as the forest that they replaced. Clearcutting is not the best method to eliminate fear of wildfire unless you clearcut the entire forest (<https://www.mdpi.com/2571-6255/5/2/41>). Fuel treatments like thinning, not clearcutting, should take place within the federally designated WUI that is being proposed for both the RO proposal and the Mid-Swan Landscape Restoration and WUI Project.

Home hardening

Strong winds can carry firebrands 2-4 miles before dropping them onto rooftops of homes. In Fall 2023 the one home that survived the Lahaina fire in Hawaii was recently remodeled as a hardened structure, making it resistant to fire (<https://www.latimes.com/california/story/2023-08-18/how-did-the-red-house-survive-the-lahaina-fire>). Tree-cutting is ineffectual against raging wildland fires because firebrands they generate can easily fly over thinned forests and spark new fires in the distance (<https://undark.org/2023/11/23/opinion-wildfire-plan/>).

What happened to the USFS Firewise Program's principles of home hardening, making homes near forests more fire resilient? Can some of the funds allocated to the RO project include federal funds to help local homeowners with home hardening? There is no need to promote logging of intact, old and mature forests far from urban communities.

Roading

Why aren't all 12 miles of temporary and new roads decommissioned and rehabilitated at the end of the RO treatment? Gates on closed roads are ineffective and inadequately monitored. I have observed numerous gates on both the east and west sides of the Swan Valley that are vandalized, locks missing, gates left open that should be closed, and motorized travel in all seasons around either side of gates with trees cut out to get around closed gates.

Recommendations

- Forest Service specialists should walk through the entire RO project area so they know what they are talking about. Due to staff turnover on the SLRD, there are staff members who have only been here for a few months and need be more familiar with Forest Service-managed lands they are charged with managing.
- Why wasn't there a field trip on the RO project area earlier this fall? Looking at the general area from afar off of Pine Ridge Road at a dispersed campsite is not sufficient to

gain an understanding, much less support for such a complex array of treatments. Many residents of the Swan Valley have a strong interest in how our public lands area managed and would attend field trips within the proposed treatment area.

- Why isn't there more planting of seedlings than is proposed in this project?
- Have local Tribes been consulted? What are their positions on this proposal? These are aboriginal lands that they occupied long before the arrival of white settlers.
- The Foothills trail access above Cooney Lookout should NOT be developed. SLRD recreation program personnel removed all register boxes along the Swan Front, including one at the north end of the foothills trail so there is no objective data on how much visitor use there is on this trail with the primary destination to Lower and Upper Rumble Lakes and Holland Peak. On busy weekends throughout the spring, summer, and fall cars and trucks with stock trailers are parked all the way down to Cooney Lookout. Crowding occurs up at Upper Rumble Lakes and sometimes Holland Peak. Developing this trailhead will only increase use in an already heavily used area. Campsites at Lower Rumble Lake are highly impacted with compacted soil, and many alpine trees have been cut down for campfires. Human waste is not properly buried and there is litter within and adjacent to each campsite. The area in proposed Wilderness on the Swan Front is being loved to death.

Thank you for your consideration of comments from a 45-year resident of the Swan Valley who worked as a wilderness ranger in both the Swan Front and the Mission Mountains Wilderness for 35 seasons. I lost my first home in the Swan Valley to a fire in 1989.

References

Cody Evers, Andres Holz, Sebastian Busby & Max Neilsen-Pincus. (2022). Extreme Winds Alter Influence of Fuels and Topography on Megafire Burn Severity in Seasonal Temperate Rainforests under Record Fuel Aridity. *Fire*, 5(2), 41; <https://www.mdpi.com/2571-6255/5/2/41>

Christopher Flavelle & Nadja Popovich. (2022). Here are the Wildfire Risks to Homes Across the Lower 48 states. *New York Times*.
<https://www.nytimes.com/interactive/2022/05/16/climate/wildfire-risk-map-properties.html>

Jason N. James, Norah Kates, Catherine D. Kuhn, Caitlin E. Littlefield, Colton W. Miller, Jonathan D. Bakker, David E. Butman, & Ryan D. Haugo. (2018). The effects of forest restoration on ecosystem carbon in western North America: A systematic review, *Forest Ecology and Management*, Vol. 429, p. 625-641. <https://doi.org/10.1016/j.foreco.2018.07.029>

Paul Koberstein & Jessica Applegate. (2023). Opinion: The Logjam in Biden's \$50 Billion Dollar Wildfire Plan. The administration's plan to thin forests ignores an important way that wildfires spread and set houses aflame. <https://undark.org/2023/11/23/opinion-wildfire-plan/>

Christopher Flavelle & Nadja Popovich. (2022). Here are the Wildfire Risks to Homes Across the Lower 48 states. New York Times. <https://www.nytimes.com/interactive/2022/05/16/climate/wildfire-risk-map-properties.html>

Alex Wigglesworth. (2023). The real story behind that photo of a weirdly unscathed house in the rubble of Lahaina. Los Angeles Times. <https://www.latimes.com/california/story/2023-08-18/how-did-the-red-house-survive-the-lahaina-fire>