Rumbling Owl Project comments

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* These comments are my personal comments as a resident of Condon and the Swan Valley regarding the Rumbling Owl Project and do not reflect opinions of any organization I may work for or am associated with.
* I think this is a great project and support the Rumbling Owl project and the effort to reduce wildfire risk to the forest, communities, and neighborhoods of the Swan Valley in the Rumbling Owl area.
* I support the use of the Western Firesheds Emergency Action Determination, Section 40807 of the Infrastructure Investment and Jobs Act for this project.
* At the current forest condition in this project area, doing no active management will be a tremendous risk of high severity wildfire to this fire adapted forest ecosystem and wildlife.
* I am disappointed that the prescribed burns within “proposed wilderness” of the Swan front of the project area that were discussed early in this project development were removed from this proposed action.
* Utilize stewardship contracts to bring money back to the district for infrastructure improvement activities and restoration
* The Steve Barrett fire history study and paper “Fire History and Fire Regimes of the Upper Swan Valley” MT 2002 describes the fire history of this project area based on fire scars. It describes the historical fire regimes and should help shape and justify the huge need for the thinning and burning project in the project. Also, aural native American knowledge tells us that this project are historically was burned frequently and much of it was more open than currently.
* Commercial and non-commercial treatments:
  + I support active management of the forests in the Swan Valley.
  + Focus logging and fuels reduction in the WUI, around the private land first, around the values at risk and around primary lines of defense
  + I support the intent to increase the presence of large, fire resilient trees especially ponderosa pine and western larch on the landscape, by harvesting the smaller shade tolerant species that are encroaching due to fire suppression and previous logging practices
  + I support variable density type of commercial treatments with clumps and gaps, wildlife patches, and daylighting around old growth trees. Avoid the uniform logging treatments based on basal area factor and European style forestry silviculture etc.
  + Consider deer and elk winter range during project design however it should not be the major driver for not doing treatments in ponderosa stands that historically burned every 10-20 years and now have had 100+ years since last fire event. Healthy old growth open-understory, and regularly burned, ponderosa pine stands are rare in the west now due to our mismanagement and get more rare every year due to severe wildfires throughout the west. Whitetail deer in north America are not in threat, and their range has expanded dramatically with European colonization. I support the thinning and prescribed burning of the ponderosa and larch forests in this project.
  + Unit 107 and 108: What is the seed tree prescription for these units? Leave the large ponderosa pine and larch in these units and various other ages of ponderosa and larch crowded by Doug fir, spruce etc. All the ponderosa pine and larch and biggest Douglas fir should be left in this treatment. Thin from below, take the worst, leave the best.
* Primary lines of defense (PLOD’s)
  + Focus logging and fuels reduction in areas, such as along roads and create tactical shaded fuel breaks, along the Primary lines of Defense already identified in the Seeley Swan Fire Plan for example for fire protection of the Swan Valley communities. Do all of this before the large wildfire happens, before it is an emergency.
* Roads
  + The Swan Valley has a considerable amount of roads already, use the current road system and minimize new roads
  + I support decommissioning roads that are problematic, are in riparian areas, cross streams, or have minimal use for management
* Prescribed fire
  + Prescribed fire is an important forest management tool that is underutilized
  + I support as much prescribed burning as possible in the project. The project should plan for repeat burning every 10-20 years for a lot of the ponderosa stands as managing this forest will require maintenance over time.
  + Consider burning opportunities on south and west facing slopes that you could burn in late March and April, that would still be completely surrounded by snow, no line construction needed.
  + Coordinate with private landowners adjacent to prescribed fire units, and thinning units and see if they want their land burned or thinned too while you are there, cross boundary treatments
* Western white pine
  + I support the efforts to restore western white pine in the Swan Valley through the thinning of other species and planting rust resistant western white pine.
* Old growth
  + I support the understory thinning of small trees and shade tolerant species that have become more prevalent in the old growth ponderosa pine and larch forests to restore and maintain those old growth forests.
* Thank you for this project. We need active management in this project area to restore the fire adapted forests and reduce the risk of a severe wildfire.