

December 17, 2024

USDA-Flathead National Forest (FNF)
Swan Lake Ranger District
Attn: Jeff Durkin and Chris Dowling
200 Ranger Station Road
Bigfork, MT 59911

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

***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 helped facilitate support and gather important feedback on any concerns that existed, 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 outreach via the postcard mailing with the local community about the public meeting on November 29, 2023, as well as the postcard mailing informing citizens about the Rumbling Owl Project EA public comment period.

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, gravel pit restorations, road decommissioning, thinning in tree plantations, and the majority of fuels reduction treatments in the WUI.

I am also in support of utilizing Wyden authorities as part of this project to perform prescribed fires in partnership with private landowners, as it is important to create cross-boundary connectivity with fuels treatments while also providing the ecological benefits that comes with reintroducing fire to the landscape where it has missed several fire return intervals during the era of fire suppression.

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 be highly considerate of winter range values as part of this 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, 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) contains 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, this 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 during the peak of winter during maximum snow depths and 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 Work Center.

The USFS should gate 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/middle edge of Section 33. Currently it is open year-round to motorized vehicles, but cuts right through the middle of this important east-west wildlife migration and travel corridor (described above) and keeping this an open road seems unnecessary but would have substantial positive impacts for wildlife. I suggest gating this road at Holland Lake Road, instead of putting a gate where the berm currently exists on the south edge of Section 33.

It is very hard to discern the difference between a clearcut with leave trees and a prescribed burn on the EA's map legend as both are tan crosshatches. Some of the units are very small and also hard to differentiate between each other on the map. It's hard to be sure but I believe Units 253, 253R, 252R, 252B, 254R, 134R, 251R are either slated for a clearcut with leave trees or a prescribed burn. A clearcut with leave trees in these units would be inappropriate and if a prescribed burn is conducted here, ideally there would be numerous untreated patches or untreated strips of thicker forest to facilitate east-west wildlife travel connectivity through this larger patch of winter range habitat described in paragraphs above.

Unit 129 contains mule deer winter range where the animals drop down in elevation during tough winters or during particular deep snow events. If treated, this unit should err on the side of a lighter treatment, again with concern for leaving enough thermal cover, snow canopy intercept, hiding cover, and connectivity throughout this unit.

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 widths and treatments on 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 137, 138, and 139.

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 north of Holland Lake Road 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 and provide a buffer of no treatment around. Instead, I suggest implementing a shaded fuel break treatment along the south side of Holland Lake Road in Unit 137, similar to other previous treatments that can be found along Holland Lake Road, while leaving the remainder of Unit 137 untouched.

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. This is an important north/south wildlife travel corridor, and a seed tree cut would make conditions much too open to support winter range, snow canopy intercept to facilitate winter wildlife habitat connectivity and travel, as well as the remaining limited hiding cover after the last USFS entry in these stands (Units 141, 264, 292).

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 am very disappointed that the large, prescribed burns on the face of the Swan Front were not added back in to the proposed action after initial public interest in the project formation and scoping phase. 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 in future projects.

I was also disappointed to see the USFS treatment in the Beaver Creek project across the highway from Owl Loop Road in regard to keeping any strip(s) of hiding cover to facilitate that (once) heavily used wildlife crossing corridor. Instead, that treatment has shifted animals to crossing to the south where there was a lighter treatment and now a thicker patch of forest where animals have adapted to crossing the highway. Unfortunately, this thicker patch of forest is where animals are crossing and is not on a straight part of Highway 83 and is on an S-curve, and that lack of forethought has led to increased opportunities for human-wildlife vehicle collisions and associated safety hazards. I encourage the USFS to give more consideration to important wildlife crossings and migration corridors in this project and in future ones as well in treatments along the highway. Units 271 & 272 are where there should be some consideration of maintaining a strip of timber that would facilitate where animals cross the highway (although there isn't much hiding cover to connect to on the west side of the highway anymore).

I have to question the proposed treatments in 297R and 136A along Holland Creek. It seems that these treatments would potentially contribute sediment delivery directly into Holland Creek and may have potential negative impacts on bull trout habitat and would be inviting potential litigation with the proposed RMZ treatments. In addition, any grazing allotments within these RMZ treatments may lead to increased concentrations of cattle in these RMZ areas post-treatment and invite weeds, trampling and compaction of these sensitive habitats, and lead to increased sediment delivery into Holland Creek.

I am also curious what the temporary crossing over Buck Creek would be? Would this increase sediment delivery directly into Buck Creek?

I am pleased to read in the EA that "all snags and live broken top trees of larch, ponderosa pine, and cottonwood over 20 inches will be retained." Many units throughout the Rumbling Owl project area have many snags that provide important wildlife habitat for pileated woodpeckers, pine marten, cavity nesting birds, and a variety of other species. I was extremely disappointed to see numerous large diameter snags were needlessly cut down in one particular unit within the Cold/Jim Project area (Unit 8). While I realize

that there only needs to be a minimum number of snags retained to meet Forest Plan specification and often times contractors are given permission to cut down snags for 'safety considerations', it seems as if those considerations were abused in the Cold/Jim Project area and I don't want to see the same mistakes and needless destruction of these valuable habitat resources occur again in similar circumstances. Just simply leave all the large diameter snags.

I am glad to read that the culturally modified trees and other sensitive cultural or historic areas within the project area have been identified and that necessary actions are in place to protect these sites. However, given the Swan Lake Ranger District's issues with protecting other historic or cultural sites within the Swan Valley in recent history (obliterating the historic Smith Creek School House and burning down the historic, relatively intact trapper cabin in the Lindy Burn), follow-through and monitoring during project implementation will be of the utmost importance.

The USFS should also be careful not to ruin or obliterate the historic outfitter trail that started at the 33 Bar Ranch and travels east through the project area, eventually connecting with the Foothills Trail. Parts of this trail run through Units 122, 123, 311, and 129 (I believe) as well as other units to the south and west of Unit 122. While this is no longer a maintained trail system, it can still be easily found, and its trail template should remain undisturbed on the landscape during mechanical treatments.

One of the largest established patches of orange hawkweed in the Swan Valley is in Unit 118. This infestation, along with established infestations of houndstongue throughout the project area are due to the established grazing allotments within the project area, which appear to be costing taxpayers more to deal with the degraded wildlife habitat from weeds being established and spread as well as associated costs from weed spraying than the lease payments. Given that the weed treatments have been lacking in combating these established patches of weeds within the project area prior to any activities from this proposed project, it is concerning that grazing allotments will continue to be allowed in the future, which will undoubtedly be further exacerbated by soil disturbances associated with the proposed project in addition to the continued grazing allotments. Unit 118 should be pre-treated with herbicides, the contractor should be required to wash their equipment before moving on to any other Units, and the unit should receive post-treatment weed spraying.

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. Since the Rumbling Owl Project cannot move forward until the Flathead National Forest litigation is resolved over illegal motorized trespass concerns on gated roads, it seems that there should be increased consideration as well as improved/increased future enforcement, monitoring, and more expedited maintenance and fixing of identified locations where these illegal motorized trespasses are occurring.

I encourage the USFS to utilize local contractors to perform the mechanical thinning for this project as it provides valuable work for local loggers and local economies, which will be even more important after the closure of Pyramid Mountain Lumber.

Thank you for your consideration,

Luke Lamar