



December 19, 2024

Flathead National Forest
Attn. Jeff Durkin, Project Leader
Swan Lake Ranger Station
200 Ranger Station Road
Bigfork, Montana 59911

Re: Rumbling Owl Fuels Reduction Project Draft Environmental Assessment Comments

Dear Project Leader Durkin,

Montana Forest Consultants (MFC) submits the following comments regarding the Rumbling Owl Fuels Reduction Project Draft Environmental Assessment.

Montana Forest Consultants is the largest and most comprehensive forest consulting company in Montana, spanning a footprint of over 100,000 acres and serving over 200 landowners and agencies since 2016. MFC is a team of foresters, biologists, and ecologists that provide expertise and technical services to landowners and agencies, offering a holistic approach to forest and rangeland management. MFC takes great pride in providing solutions for complex projects that greatly improve a landscape and meet landowner goals and objectives. MFC is a strong supporter of forestry best management practices and streamside management laws.

At present, MFC is providing services to several private forest landowners within the footprint of the Rumbling Owl project. Through these projects, and extensive past work in the area, MFC has developed a high level of working knowledge about the forests, ecology, sensitivities, and needs of the Swan Valley. The landowners who are utilizing our services in the project area are primarily concerned about hazardous fuels reduction, including reducing property and structure risk from wildfire, and promoting biodiversity. In addition to community concerns, the Montana Forest Action Plan identified this portion of the Seeley-Swan Valley as one of the areas of 'Elevated Risk' and

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'Degraded Forest Health' and the Forest Service Wildfire Crisis Strategy's included this area as one of the 19 high-risk fireheds in Montana. It is, therefore, appropriate that the Flathead National Forest intends to use emergency action authority to execute the Rumbling Owl project and MFC supports the proposed action alternative presented in the Environmental Assessment.

The Rumbling Owl project directly addresses these community, Forest Service, and Forest Action Plan concerns by reducing hazardous fuels present on public lands throughout the greater Condon area. While immediate Home Ignition Zone treatment on private lands is important, it is only truly effective when paired with forest treatments that treat the larger WUI landscape on both public and private lands. MFC is actively treating private forest lands, and the Rumbling Owl project will address the public lands piece of the puzzle. Landscape-scale resiliency requires both of these puzzle pieces to be completed. As such, MFC would like to see the Rumbling Owl project implemented to increase this community's wildfire resiliency and is supportive of the use of emergency action authority. We are also supportive of the portions of the project designed to address the area's significant forest health issues.

MFC urges the Flathead National Forest to understand the forest treatments being applied on private and state lands across the Rumbling Owl landscape and to seek to match treatment types across boundaries. Cross-boundary efforts, a now commonly accepted and endorsed approach to forest management, will allow for the creation of more contiguous field breaks. Connecting treatments will serve to reduce potential for changes in wildfire behavior across ownership boundaries, improving opportunities to manage fire if it were to move through this landscape. To facilitate cross-boundary efforts across Forest Service and private lands, MFC has seen considerable landowner interest in exploring Wyden Authority partnerships within the Rumbling Owl project area. MFC is also interested in sharing information about our Rumbling Owl area private lands forest prescriptions with Swan Lake Ranger Station staff to increase continuity in treatments from public to private land parcels, and we encourage you to reach out to our team to initiate sharing.



An unmaintained trail currently extends from one of our landowner parcels across Township 20N, Section 26 north of Holland Lake and connects with the maintained East Foothill Trail #192. When conducting treatment activities planned for Section 26, it would be appreciated if care is taken to avoid obliterating this trail.

As indicated earlier, our landowners are also invested in protecting biodiversity on their lands, and this is only possible if this value is also protected on adjacent public lands. We support the change from Scoping to EA to account for the important winter range values provided by the project units north of Holland Lake by increasing the retention of Douglas-fir and ponderosa pine in all age classes in this east-west wildlife migration corridor. This change will help ensure that planned treatments achieve wildfire risk objectives without overly reducing snow canopy intercept potential and thermal cover to an extent that negatively reduces winter habitat and associated biodiversity values.

SMZ laws protect important riparian habitat diversity and water resources, but do not entirely prohibit work from happening in riparian zones. There is little to no SMZ management planned in the Rumbling Owl project, and MFC encourages the Forest to evaluate whether limited treatments should occur in some riparian zones to minimize potential for riparian vegetation to carry wildfire during particularly dry years.

MFC supports this project's intentions to fix the Barber Creek Road slump and associated sediment issues the slump has created.

Overall, it is in everyone's best interests if Forest Service projects are designed to minimize the potential for no bid outcomes. Contractors working across our region would like to see Forest Service projects minimize and simplify road work components that are directly paid for as part of a timber sale. If extensive road work is identified by USFS engineers as necessary, we propose either a hard money contract or a longer term stewardship agreement to be pursued to fund this work in uncertain timber markets. We encourage the Flathead to update its understanding of current contractor rates for road components before any Rumbling Owl sales are released for bid. Please note that the



Environmental Assessment describes actions for Road 9582, but this road is not labeled on any of the supplemental maps.

MFC will be conducting long term monitoring of our mechanical treatments in the Rumbling Owl area, and we'd like our monitoring methodology to pair well with any monitoring planned for the Rumbling Owl project landscape and invite open conversations between our teams about monitoring methodologies and goals.

At least one of our landowners will need to provide right-of-way access to the Flathead National Forest to conduct the treatments proposed in the Rumbling Owl project and Forest Service staff have already done the due diligence to confirm this landowner is willing to provide such access. The ability to obtain such access permission is another form of community support for this project.

Thank you for the opportunity to provide Draft Environmental Assessment comments for the Rumbling Owl project. Montana Forest Consultants looks forward to continuing to participate in the ongoing project planning process.

Sincerely,

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Founder and CEO

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