

To: USDA Forest Service, Flathead National Forest, Swan Lake Ranger District, Bigfork, Montana

From: Stewards of the Swan Valley

Date: December 23, 2024

Comments on the Rumblin Owl Fuels Reduction Project from Stewards of the Swan Valley

Stewards of the Swan Valley is a charitable 501(c)(3) nonprofit organization dedicated to preserving the community, culture, and environment in the Swan Valley and adjacent areas in western Montana. Our mission is to reflect local community values while facilitating efforts that sustain, enhance, conserve, and protect the natural and cultural resources and rural lifestyle of the Swan Valley for present and future generations. Please accept the following as our comments regarding the Environmental Assessment for the Rumbling Owl Fuels Reduction Project.

The Forest Service proposed the Rumbling Owl Fuels Reduction Project to treat more than 6,000 acres in the Swan Valley. They prepared an environmental assessment, in keeping with the NEPA and other requirements, to “determine whether effects of the proposed activities may be significant and require preparation of an environmental impact statement.” The EA tiers to the forest plan. The area is 78 percent NFS land and 22 percent privately owned land.

The proposed project is designed to meet many goals relating to physical, biological, and social values. A primary goal is to, over time, create conditions that would allow for inevitable wildfire while protecting resource values from wildfires’ adverse impacts. The current condition includes increasing risk to governmental and private infrastructure, ecosystem structure and function, and the local economy. Reducing the risk and severity of uncontrolled wildfire reduces risk to residents, visitors, and others, while providing firefighters greater chance of success in fire suppression. A related goal is to improve forest health by enhancing the diversity of the forest composition throughout the project area.

Recreation use is a huge concern. Recreation uses continue to grow and new types of recreation are constantly being developed. This means that associated impacts to fire frequency, wildlife habitat and populations and other resources are increasing, which also affects the sense of place that is so important in this locale.

Overall, the proposed project as laid out in Alternative B is good for the ecosystems and natural resource resiliency, good for increased safety, and good for the local economy. The Stewards of the Swan Valley is emphatic in its support for the project’s goals and looks forward to working with the Forest Service to ensure the project is carried out in the best interest of this unique and wonderful place. We offer the following as our more specific comments:

- The responsible official determined that it was not necessary to fully analyze additional action alternatives to determine potential effects to resources.
 - We believe the decision not to fully analyze additional action alternatives is legally sound. We also believe that decision should be revisited if new information becomes available that suggests or identifies alternative actions.

- These approximately 640 acres within Township 20 North, Range 16, Section 33 that were acquired by the FS (in Management Area 6b), include approximately 8 miles of undetermined roads. The proposal calls for 2.8 miles of those roads to be obliterated and restored to a more natural state. The remaining 5.4 miles are proposed to be added to the National Forest System.
 - Elimination of roads in that area would be beneficial to the ecosystems and setting, and adding additional miles to the National Forest System may allow for more efficient access and management. However, Appendix C, which shows the undetermined roads does not show which of these miles will be obliterated and which will be added to the NFS roads system. In addition, 2.8 (miles to be obliterated) plus 5.4 (miles to be added to NFS) adds up to 8.2. Your analysis jumps between generality (approximately) to more specific (and yet undetermined as to exact location) terms. Where are these roads?
- Outside of the newly acquired Section 33, there are approximately 4.0 miles of temporary roads proposed within the project area.
 - Creation of new temporary roads is necessary in a project of this scale, and the requirements to restore those roads to support and protect local resources is desirable.
- Approximately 41.6 miles of NFS roads used as haul routes would receive road maintenance. (to reduce the concentration of subsurface and surface water runoff, minimize road surface erosion, filter ditch water before entering streams, and decrease the risk of culvert failures during peak runoff events.) To maintain free-flowing streams, new, replacement, and reconstructed stream crossings (culverts, bridges, and other stream crossings) shall accommodate at least the 100-year flow, including associated bedload and debris.
 - Many of the roads used as haul routes are public and are access routes to private properties. Leaving those roads in as good a condition as possible is essential. We also highlight the need to account for public safety on haul roads as those roads will be co-occupied by local residents, visiting recreation and special forest product users, and others. In particular, please ensure that, where possible, egress routes from private property are not blocked.
 - Road planning, design, and maintenance must be conducted in a way that ensures that first responders can gain efficient access to the properties along and at the end of these roads.
 - As a general policy, road management of all roads should be geared toward the multiple use (recreation access and use, forest management, property access, wildlife habitat, plant habitat, etc.) for which these forests are intended.
- Commercial treatments would take approximately 5 years to complete, but other project activities could take up to 10 years to complete. Activities that require changes to access management would be completed in four years.
 - Is there a list of units in order of timing? Where will we expect the work to be accomplished the earliest? The latest?
- A total of approximately 240 acres of private land exists within the project boundary. As the EA notes, in many cases, small private forested areas are not managed, and those forests are densely stocked stands with large quantities of dead trees. These sites are highly vulnerable to both insect and disease outbreaks and wildland fire.
 - We suggest that you contacted all landowners within the project area directly to see if they are interested in Wyden Amendment agreements to have their lands treated as

part of this project. We are aware that the owners of the 160-acre Clark Ranch (adjacent to units 145, 146, 261, and 308) have contacted you to express interest in having work done on this private as it enhances the work on NFS lands.

- The Flathead National Forest follows Montana/Idaho Airshed Group planning, and approval processes for prescribed burning on air quality in Airshed 2, and also Missoula County open burning restrictions for pile burning in the spring and fall seasons as set by the Montana Department of Natural Resources and Conservation. In addition, air quality would be addressed in the prescribed fire burn plans. Compliance with these two programs reduces air quality impacts 104 Rumbling Owl Environmental Assessment-Other Effects that could occur with any of the prescribed burning activities in the Rumbling Owl project as proposed in Alternative B (Proposed Action) and meet forest plan desired conditions as stated by FW-DC-AQ.
 - We request that all prescribed burns be well advertised well in advance of burning, along with information about expected duration and expectations of smoke levels as they may affect air quality. This comment goes toward the Rumbling Owl project in specific but also applies to notification and other communications with local organizations, individuals, and information outlets. Too often we see firefighters show up at prescribed burns because lack of prior communication.
- Effects on Wildlife:
 - Overall, we expect little to effects on wildlife in the project area over the long term. However, monitoring in close cooperation with the US Fish and Wildlife Service and other organizations should be continuous and adjustment to treatments should be made in areas where the monitoring might indicate.
- Effects to Aquatics:
 - While proposed activities are anticipated to provide long-term benefits to aquatic resources, short-term effects (less than 3 years), primarily in the form of sediment delivery, will be a trade-off. We understand that the proposed actions will impact local streams and therefore aquatic habitat for many species, including Bull Trout. That is why we encourage active and consistent monitoring in cooperation with federal, state, and local governments as well as other organizations equipped to help. Best management practices are not always the best, but rather an approximation of desirable actions. Those practices must be modified on the basis of new knowledge or capabilities.
- Effects to Heritage: The inventory heritage resource inventory completed for this project located several significant sites that will be protected or maintained and will not be adversely impacted by project activities.
 - If the inventory conducted by staff was solely a records search, ground truthing of the identified sites should be completed and the extent of those sites verified. In addition, there may be multi-site or heritage district aspects that could be explored. For example, we are aware of historic trails used by indigenous people from the Flathead valley to access the Swan Valley. It appears logical that an associated trail to access what is now the Bob Marshall Wilderness from the Swan Valley could occur in the project area, especially in the area around Holland Lake and the current pack trails on either side of the lake.

- Effects to At-Risk Plant Species:
 - The Environmental Assessment notes that “No significant effects will result from this project or cumulatively with other activities on National Forest or adjacent lands that will affect at-risk plant species’ ability to persist on the landscape.” Again, continuous monitoring to verify that assertion is necessary.
- Effects to Federally Listed Species:
 - The Environmental Assessment states that there are no document occurrences or suitable habitat in the project area for the two listed species – Spalding’s catchfly and whitebark pine. With no occurrences or suitable habitat within the project area, no additional action is necessary.
- Economics: The overall project PNV is \$1,006,312. PNV evaluates cost and revenue related to timber outputs.
 - The EA does not address overall economic impact to the local economy of the Swan Valley and associated region. This analysis therefore makes little sense to the people who live, work and play here. The real question of economic effects to people in the Swan Valley and Seeley Lake is brought up in the Environmental Justice portion of the EA, but even that does not give readers an idea of what the effects will be on local’s economic situation.
- Forest Carbon Cycling: Prescribed burning and fuels reduction actions under the proposed action may result in temporary increases in carbon emissions but will lead to longer-term stabilization of carbon stocks.
 - We offer no substantial comments on this topic
- Scenery: The proposed land management activities associated with the Rumbling Owl Project would promote visual rehabilitation of the landscape by improving natural scenic characteristics in the long-term.
 - We believe that a public presentation of what the landscape would look like from a variety of locations over time would be beneficial in evaluating the effects on the viewshed. That said, we hope that the long term visual effects will be positive even though the short and midrange effects to the viewshed will be disruptive.
- Sound:
 - The Environmental Assessment does not address the impacts of noise from roadwork, logging operations, or anything else. Impacts on wildlife, local residents, and visitors could be substantial in specific places during relatively short periods of time, and across larger landscapes for longer periods. That should be disclosed in the Environmental Assessment.

Submitted by unanimous consent by Stewards of the Swan Valley

Fred P. Clark

Fred Clark, Vice President