

December 23, 2024

U.S. Forest Service

Swan Lake Ranger District

Attn: Christopher Dowling (Rumbling Owl)

200 Ranger Station Road

Bigfork, MT 59911

Dear Ranger Dowling,

Please accept these additional comments from me on the Rumbling Owl EA on behalf of the Alliance for the Wild Rockies, Center for Biological Diversity, Yellowstone to Uintas Connection, Council on Wildlife and Fish, and Native Ecosystems Council, collectively “Alliance”, in response to the Legal Notice dated November 22, 2024.

The vegetation standards in the NRLMD are based on the underlying assumption that all exempt fuel treatment projects will meet the WUI definition established by Congress in HFRA. The NRLMD ROD reasoned that using this definition would establish a national procedure for determining the extent of the WUI, thus limit the amount of fuel treatment projects that could exceed the vegetation standards, and in turn, limit the known adverse effects to lynx that would result from fuel treatments. The NRLMD based its analysis on a WUI that was defined as a mile from where people were living and concluded that only about 6 percent of lynx habitat was within that one-mile buffer, leaving 94 percent of lynx habitat protected by its vegetation

standards. Yet, this is not what has happened. This project—like so many that have come before it—expands the WUI definition well beyond anything contemplated by the NRLMD. This expansion has exposed more land to fuel treatments without any consideration of the cumulative effects of such a sea change to lynx at the programmatic level. The NRLMD EIS is no longer a valid analysis; the Forest Plan illegally tiers to the NRLMD; and the Project EA is arbitrary and capricious because it is built on false promises and a shattered foundation.

Thank you for your time.

Sincerely yours,
Mike Garrity
Executive Director
Alliance for the Wild Rockies (AWR)
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And for

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And for

Steve Kelly

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P.O. Box 4641

Bozeman, MT 59772

And for

Sara Johnson Director

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And for

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