

Hello Jeff Durkin and Chris Dowling,

Thank you for inviting the opportunity to comment on the Rumbling Owl Fuels Reduction Project Environmental Assessment (Project). Many of the concerns that I submitted last year remain concerns for me now, and I cannot offer complete support for the project as proposed in the EA. I remain especially concerned with the negative impacts that this project poses to wildlife, especially to core wintering range for ungulates and sensitive species.

I support culvert replacements, slump repair, and road decommissioning aspects of this project.

I support the management of invasive species, and I would like to see aquatic-approved herbicides used in all settings where herbicides are necessary.

I support limited commercial and non-commercial thinning directly adjacent to roads/development, within plantations, and patchily throughout the WUI. I would like to see all harvest activities operate with the lightest equipment possible, prioritize local contractors, use only existing road networks, and take all precautions to prevent invasive species. In all cases, treatments should be patchy, with numerous clumps of untreated vegetation that prioritize connectivity, forage, and cover for all forest wildlife species. I support following these patchy thinning activities with light, hand-ignited prescribed burns, with care to retain large woody debris and stumps. I support burning of some piles where necessary, as long as piles are kept small to avoid soil scarification. I support efforts to replant western white pine areas where it is ecologically suitable.

I support the retention of large woody debris, stumps, and “all snags and live broken top trees of western larch, ponderosa pine, and black cottonwood over 20 inches” (30), but this mandate should not be limited to these species or this diameter. Many other tree species are valuable as snags (aspen, Douglas fir, western red cedar, among others). Anything over five inches DBH could be viable for species that use snags but not necessarily the largest ones, such as the American three-toed woodpecker.

I do not support the construction of any new roads for this project, including “temporary” roads. Road construction of any kind will have irreparable long-term consequences, including but not limited to soil compaction/erosion, habitat connectivity disruption, and invasive plant dispersal. If intended activities are not accessible with the existing road network, they should be conducted non-commercially with hand crews, or left alone.

I do not support the clearcut/regeneration harvests, group selection, overstory removals, or related commercial treatments. Such large wood-free openings do not mimic natural processes, and they will pose serious consequences to whatever forest community that remains, including via soil warming, invasive plant dispersal, severed mycorrhizal networks, lost wildlife habitat, and much more. Such forest conversion and/or removal at this scale would be detrimental to the snow intercept, hiding cover, and lichen forage that trees in the project area provide to ungulates in winter. The entire project area is crucial ungulate winter range, and it is already fragmented by abusive logging practices under Plum Creek’s tenure. It is unacceptable to subject the project area to further loss with the large-scale, commercial treatments proposed.

I do not support the treatment of old growth or riparian areas.

I do not support the lack of road ecology planning in this project. This project fronts Highway 83 in many places, and covers some important east-west wildlife corridors, especially in the project’s southern half. I would like to see substantial efforts made in to protect forest connectivity and reduce human-wildlife collisions along these wildlife corridors.

I do not support the EA's gloss of the significant consequences to ESA-listed and other sensitive species. Wolverine were listed as Threatened in just the last year, Canada lynx are in the midst of a Critical Habitat revision at this very moment, and grizzly bears are facing imminent uncertainty with the threat of premature delisting. It is not ecologically sound for a project to acknowledge significant harm to these species and proceed anyway. I would also like to see more attention given to other special status species that are not addressed in this EA. There are many MT Species of Concern that this EA does not address (including several bats, pileated woodpecker, great blue heron, evening grosbeak, western toad, and great gray owl, among others). This project also has me especially concerned with consequences for martens (American marten, *Martes americana* and Pacific marten, *Martes caurina*), both sensitive, understudied species. This project area is a critical zone where these *Martes* species overlap, and there is imminent work to address knowledge gaps in *Martes* classification, distribution, and conservation status that this project may hinder. These species require older forests with robust connectivity, and this project does not prioritize those values.

I do not support the continuation of the grazing lease in the project area. Canceling the grazing lease and removing the associated wire fencing would be among the greatest ways to restore a resilient forest ecosystem in the project area. The fencing poses a hazard to animals of all kinds, and the cattle spread invasive plants and degrade riparian health. This has been worsening year after year after year, and this project represents an important opportunity to shift towards a restorative direction.

Thank you for considering these comments.

Best,

Rob Rich