

Rumbling Owl Environmental Assessment Comments
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I am submitting public comments on **the cumulative effects** of both the Rumbling Owl Fuels Reduction Project EA (RO) and Mid-Swan Landscape Restoration & Wildland Urban Interface Project. Over the lifetime of the RO project of (up to a 30-year time span) combined with the proposed treatment of National Forest-managed lands in the Mid-Swan Landscape Restoration and WUI Project (15-year implementation schedule, 174,205 acres) in the Swan Valley, there will be create unacceptable levels of disturbance to recreation and wildlife. The combined total FS-managed lands treated in both of these projects totals 179,605 acres. Please see below specific concerns I have outlined.

Carbon Sequestration and Climate Change

Why was additional documentation (60 pages) added 4 days before the public comment deadline? The public comment deadline should be extended so public land owners who want to submit comments addressing climate change have a chance to comment.

The WO project proposal states that “Condon has a Very High rating in all 4 assessment factors: Risk to Home, Wildfire Likelihood, Home Exposure, and Vulnerable Populations.” I do not see any commitment from the Swan Lake Ranger District (SLRD) to address how the project addresses carbon sequestration. This is an emergency considering the rapid rate of how climate change is affecting the planet. “Intact forests are considered one of the best forms of natural carbon sequestration. On average, forests store twice as much carbon as they emit. Cedar forests grow in wetter areas in bogs, peat, and swamps where carbon can be captured and stored as carbonates” (<https://www.nationalgrid.com/stories/energy-explained/what-carbon-sequestration>). Cedar groves within the RO proposal should be left intact.

Forests which have never been logged provide important wildlife habitat and are a vital carbon sink. Tree-thinning projects significantly reduce the amount of carbon sequestered in forests, worsening climate change (<https://doi.org/10.1016/j.foreco.2018.07.029>) putting more emissions into the atmosphere than the fires they hope to prevent.

The EA assumptions about regeneration fail to consider climate change and the possibility that the logged forest will not regrow in the future as it may have in the past.

Public Comments

Both the RO proposal and the Mid-Swan Landscape Restoration and WUI Project offer limited public comment periods. The Mid-Swan Landscape Restoration and WUI Project offered only one comment period for a 15-year implementation schedule and the RO only offers limited public comment periods for up to a 10-30 year implementation schedule. The public should have the ability to comment on an annual basis for both projects. The public needs to see the effects of Year 1 to see what areas were opened up, which were not. And this should be done every year for both projects until completion.

Clearcuts

Why are clearcuts necessary? There should be NO clearcuts in this project proposal. Many of the former Plum Creek Lands in the Swan Valley that have been transferred to the Forest Service to manage were clearcut and are infested with invasive species, including spotted knapweed, houndstongue, and Canada thistle that continue to spread. Restoration and rehabilitation are needed in these damaged areas.

Clearcutting practices by the Forest Service is increasingly being prescribed for our public forests, as though they will regenerate, or not, depending on the degree of global warming, and will not address the rapidly accumulating climate change affects in a timely manner. These areas will be effectively deforested until the trees are big enough to capture the same amount of carbon as the forest that they replaced. Clearcutting is not the best method to eliminate fear of wildfire unless you clearcut the entire forest (<https://www.mdpi.com/2571-6255/5/2/41>). Fuel treatments like thinning, but not clearcutting, should take place within the federally designated WUI that is being proposed for both the RO proposal and the Mid-Swan Landscape Restoration and WUI Project.

Increased residential development in the Swan Valley

There is a rapid rate of residential development throughout the Swan Valley, including or adjacent to project areas for both the Mid-Swan Landscape Restoration and Wildland Urban Interface Project and the Rumbling Owl Fuels Reduction Project EA. Many new residents to the Swan Valley have extensive financial resources to purchase large acreages adjacent to both project proposal areas and many of these newcomers lack sufficient understanding of ecological and forest management. Some of this development is adjacent to the Mission Mountains Wilderness, Swan Front, and Bob Marshall Wilderness. This development is negatively affecting critical wildlife corridors and water quality issues in aquatic ecosystems, watersheds, and riparian areas.

At times, scare tactics are used by the Forest Service and MT Dept. of Natural Resources to create the “safety net” impression that these residential homes will not burn down in a wildland fire (<https://undark.org/2023/11/23/opinion-wildfire-plan/>) or prescribed burn that gets out of control (Hayden, 2024). The only way these homes can survive the threat of fire is to clearcut large swaths of public and private land adjacent to homes (<https://www.mdpi.com/2571-6255/5/2/41>). This is not an ecologically acceptable alternative.

Home hardening

Strong winds can carry firebrands 2-4 miles before dropping them onto rooftops of homes. In Fall 2023 the one home that survived the Lahaina fire in Hawaii was recently remodeled as a hardened structure, making it resistant to fire (<https://www.latimes.com/california/story/2023-08-18/how-did-the-red-house-survive-the-lahaina-fire>). Tree-cutting is ineffectual against raging wildland fires because firebrands they generate can easily fly over thinned forests and spark new fires in the distance (<https://undark.org/2023/11/23/opinion-wildfire-plan/>).

What happened to the USFS Firewise Program’s principles of home hardening, making homes near forests more fire resilient? Can some of the funds allocated to the RO project include federal funds to help local homeowners with home hardening? There is no need to promote logging of

intact, old and mature forests far from urban communities. The Swan Valley is remote and is not urban interface, in contrast to Missoula, Polson, Bigfork, and Kalispell.

Roading

All temporary and new roads should be decommissioned and rehabilitated at the end of the RO treatment? The proposed “5.4 miles of undetermined roads may be closed to motorized access year-round by gates” but gates and other barriers on closed roads remain ineffective and inadequately monitored (Hammer, 2001, 2023, 2024). The Forest Service lacks sufficient funding for increased law enforcement presence to monitor road closure effectiveness. I have observed numerous gates on both the east and west sides of the Swan Valley that are vandalized, locks missing, gates left open that should be closed, and motorized travel in all seasons around either side of gates with trees cut out to get around closed gates or large boulders and kelly humps.

As stated in the “No Action” alternative, “there should be NO vegetation management and no system road use or temporary road construction in identified grizzly bear secure core.” Servheen, et al. have documented increased mortality or relocation of grizzly bears near roads. If roads exist, bears will use them, increasing threats to grizzly bear survival. The RO project proposal does not adequately address how threatened species will be affected by increased roading, in addition to the existing road system within the area under consideration for “treatment.”

Old growth trees should not be logged within the 2,566 acres of old growth forest habitat. The WO project does not make available to the public the old growth patch sizes and logging will decrease their function as habitat for old growth dependent wildlife.

Buffer Zones needed adjacent to the Bob Marshall Wilderness

For those of us who have lived in the Swan Valley for decades we recall the edge effects (still evident today) from Plum Creek clearcutting right up to the Mission Mountains Wilderness boundary in the Jim Lakes Basin causing erosion, and degradation of old growth habitat that directly impacts birds, wildlife, native plant that are necessary to the survival rate and old growth qualities necessary for these species to survive. There is also increased illegal motorized snowmobile/snowbike trespass on skid trails, making it easier to illegally enter designated wilderness (PL 88-577).

In 1982 the CSKT tribal Council passed Ordinance 79a, establishing the Mission Mountain Tribal Wilderness and adopted a management plan. In 1986 a Buffer Zone was created protect Wilderness and approved by the Tribal Council in 1987. The goal of the Buffer Zone is “to protect and preserve the integrity of the Tribal Wilderness and is designed to control, those activities that may adversely impact the Tribal Wilderness.” The Buffer Zone encompasses approximately 22,833 acres in the Mission Mountains foothills (Confederated Salish & Kootenai Tribes, Native Lands and Wilderness Council, 2005). The same Buffer Zone concept should be considered for WO EA on treatments planned for lands adjacent to the Bob Marshall Wilderness. Looking at maps in the EA, it appears that treatment will take place right up to the eastern boundary of the Bob Marshall Wilderness. This is not acceptable and will have serious impacts to avalanche zones (during spring snowmelt), riparian areas, and reduce scavenging opportunities for grizzly bears and other carnivores to feed on dead mountain goats and

ungulates that were caught in avalanches. It will also negatively affect wildlife travel corridors in and out of federally designated wilderness.

Fish & Wildlife Considerations

The RO EA does not analyze impacts to Sensitive Species within Region 1 including bald eagle, black-backed woodpecker, common loon, harlequin duck, bighorn sheep, fish, wolf, bats and toads.

The EA fails to analyze the cumulative impacts to bull trout in this project proposal or address invasive lake trout.

Importance of thermal cover for Ungulates

The maps in the RO EA should show current thermal, snow intercept and hiding cover as well as a comparative map that would show changes with the proposed treatments. Within this acreage I am concerned that ungulate species will be forced onto private land which apex predators will follow and get into trouble, and be relocated or euthanized.

The RO project should prioritize the winter range values since the project area is one of the most productive and concentrated areas of big-game winter range in the Swan Valley. The winter range in the Swan valley is fragmented from Plum Creek checkerboard ownership and logging practices as well as Forest Service timber harvest project that have favored fuel reduction of ladder fuels and less fire-resistance species including spruce and fir. This has led to a decrease in large connected patches of mature multi-storied forests at a landscape scale through the Swan Valley that offers the highest winter range values of hiding cover, thermal cover, and snow canopy intercept.

Both the RO project and the Mid-Swan Landscape Restoration & Wildland Urban Interface Project should give more consideration to important wildlife crossing and migration corridors as well as treatments along Highway 83.

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Recreation

The EA offers inadequate attention to recreation impacts from the proposed RO project. Yet early in the document you mention the significance of recreation in the Swan Valley, “Many values at risk within and surrounding the Condon community, including private forest infrastructure, and a *strong tourism economy*” (p. 6).

The Foothills trailhead and trail access above Cooney Lookout to Holland Lake should NOT be developed. The SLRD recreation program personnel removed all register boxes along the Swan Front, including one at the north end of the foothills trail so there is no objective data on how much visitor use there is on this trail with the primary destination to Lower and Upper Rumble

Lakes and Holland Peak. On busy weekends throughout the spring, summer, and fall cars and trucks with stock trailers are parked all the way down to Cooney Lookout. Crowding occurs up at Upper Rumble Lakes and sometimes Holland Peak. Developing this trailhead will only increase use in an already heavily used area. Campsites at Lower Rumble Lake are highly impacted with compacted soil, and many alpine trees have been cut down for campfires. Human waste is not properly buried and there is litter within and adjacent to each campsite. The area in proposed Wilderness on the Swan Front is being loved to death. There are new resources available to measure trail use that could transform how recreation is developed and managed in both of these project proposal areas (Headwaters Economics, 2023). These techniques should be applied prior to proposed treatments.

Final Recommendations

- Forest Service specialists should walk through the entire RO project area so they know what they are talking about. Due to staff turnover on the SLRD, there are leadership positions and staff members who have only been here for a few months and need be more familiar with Forest Service-managed lands they are charged with managing.
- In my scoping comments I recommended additional field trips onsite in the public comment periods. This did not happen. Looking at the general area from afar off of Pine Ridge Road at a dispersed campsite is not sufficient to gain an understanding, much less support for such a complex array of treatments. Many residents of the Swan Valley have a strong interest in how our public lands area managed and would attend additional field trips within the proposed treatment area.
- Agencies and Persons Consulted: Tribes. What are the positions of the Blackfoot Nation and the Confederated Salish and Kootenai Tribes on this proposal? Have their culture committees been consulted? These are aboriginal lands that they occupied long before the arrival of white settlers.
- Both the Mid-Swan Landscape Restoration & Wildland Urban Interface Project should consider habitat and habitat connectivity as part of integrated resource management. The cumulative impacts of these two projects will negatively impact the ecological integrity terrestrial ecosystems in the project areas of USFS-managed land in the Swan Valley.

In summary, I recommend the “No Action” alternative and ask for further analysis of cumulative effects of BOTH the Rumbling Owl Fuels Reduction Project EA (RO) and Mid-Swan Landscape Restoration & Wildland Urban Interface Project totaling 179,605 acres. In combination, both landscape level projects require further analysis from an Environmental Impact Statement (EIS).

Thank you for your consideration of comments from a 46-year resident of the Swan Valley who worked as a wilderness ranger in both the Swan Front and the Mission Mountains Wilderness for 35 seasons. I lost my first home in the Swan Valley to a fire in 1989.

References

- Confederated Salish & Kootenai Tribes. 2005. Mission Mountains Tribal Wilderness. A Case Study. Native Lands and Wilderness Council.
- Evers, C., Holz, A., Busby, S., & Neilsen-Pincus, M. (2022). Extreme Winds Alter Influence of Fuels and Topography on Megafire Burn Severity in Seasonal Temperate Rainforests under Record Fuel Aridity. *Fire*, 5(2), 41; <https://www.mdpi.com/2571-6255/5/2/41>
- Flavelle, C. & Popovich, N.. (2022). Here are the Wildfire Risks to Homes Across the Lower 48 states. *New York Times*. <https://www.nytimes.com/interactive/2022/05/16/climate/wildfire-risk-map-properties.html>
- Hammer, K. (2001). Gate-Crashing: Road Closure Gates Cannot Effectively Eliminate Trespass. Swan View Coalition.
- Hammer, K. (2023). Road Hunt: A Survey of Road Closure Effectiveness. In the Flathead national Forest's Swan Valley Geographic Area. Swan View Coalition.
- Hammer, K. (2024). Roads Revisited: A Revisit of Ten Ineffective Road Closures. In the Flathead national Forest's Swan Valley Geographic Area. Swan View Coalition.
- Headwaters Economics. 2023. New ways to measure trail use could transform how recreation is developed and managed. <https://headwaterseconomics.org/outdoor-recreation/new-ways-to-measure-trail-use/>
- Hyden, S. (2024). The Calf Canyon Fire Review: An Indictment of the Forest Service Land Management Strategy. The Smokey Wire: National Forest News and Views. <https://forestpolicy.org/category/fire-and-fuels/>
- James, J. N., Kates, N., Kuhn, C. D., Littlefield, C. E., Miller, C.W., Bakker, J. D., Butman, D. E., & Haugo, R. D. (2018). The effects of forest restoration on ecosystem carbon in western North America: A systematic review, *Forest Ecology and Management*, Vol. 429, p. 625-641. <https://doi.org/10.1016/j.foreco.2018.07.029>
- Koberstein, P. & Applegate, J. (2023). Opinion: The Logjam in Biden's \$50 Billion Dollar Wildfire Plan. The administration's plan to thin forests ignores an important way that wildfires spread and set houses aflame. <https://undark.org/2023/11/23/opinion-wildfire-plan/>
- U.S. Public Law 88-577. The Wilderness Act of September 3, 1964. 78 Stat. 890.
- Wigglesworth, A. (2023). The real story behind that photo of a weirdly unscathed house in the rubble of Lahaina. *Los Angeles Times*. <https://www.latimes.com/california/story/2023-08-18/how-did-the-red-house-survive-the-lahaina-fire>

