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REF# LA38-24

December 20, 2024

Chris Dowling

U.S. Forest Service, Swan Lake Ranger District

200 Ranger Station Road

Bigfork, MT 59911

Re: Rumbling Owl Fuels Reduction Project- Environmental Assessment

Dear Mr. Dowling

Thank you for the opportunity to comment on the Rumbling Owl Fuels Reduction Project, which has been designed to reduce hazardous fuel loading within the wildland-urban interface (WUI) and restore resilient forested stands beyond the WUI. The project also aims to build forest resiliency by increasing ponderosa pine (*Pinus ponderosa*), western white pine (*Pinus monticola*), and western larch (*Larix occidentalis*) to increase stand resiliency to insect and disease and promote forest productivity. The proposed project area provides habitat for black bears, grizzly bears, moose, white-tailed deer, mule deer, elk, mountain lions, wolves, bobcats, lynx, wolverine, various forest carnivore species and small mammals, as well as numerous avian species. The Rumbling Owl project exists within an area which links the Bob Marshall Wilderness Complex and the Mission Mountain Wilderness and serves as an important connectivity zone for many wildlife species. Grizzly bears use the project heavily throughout the year. The project area also lies within the core of winter range for whitetail deer that congregate in a small narrow belt along the Swan River from the Condon Ranger Station to Goat Creek. Maintaining stand characteristics - canopy cover, species composition, and age structure - that support continued winter use by whitetail deer is critical to maintaining game populations throughout the Swan Valley. Several project elements, including treatments to diversify plantations, address areas of beetle kill, and prescribed fire elements that promote forage and browse production will benefit wildlife and are supported by Montana Fish, Wildlife & Parks (FWP).

In addition, FWP applauds the Forest Service's commitment to retaining Douglas-fir and ponderosa pine within the east-west migration corridor just north of Holland Lake (PDF-VEG-098) as well as the favored retention of Douglas-fir and ponderosa pine within thin stands located in ungulate winter range.

To retain stand characteristics that support wintering wildlife, today and into the future, requires forethought and planning. In general, for timber treatments within winter range, FWP recommends:

- * Retention of Douglas-fir, where healthy, particularly on south to southwest facing slopes
- * Utilization of group selection to create a matrix of habitat that reduces snow depth, providing connectivity across cutting units
- * Establishment of areas where the regeneration objective is to reforest harvested openings to predominantly Douglas-fir.
- * Maintenance of 70% canopy cover with at least half the species composition comprised of full-crowned species (e.g.: Douglas-fir and ponderosa pine) for winter snow intercept.

This project area is also year-round grizzly bear habitat. Besides providing important denning and spring habitat, FWP's GPS data indicates the area is highly used during summer and fall, likely associated with huckleberry foraging and fall hyperphagia. The Northern Continental Divide Ecosystem (NCDE) Grizzly Bear Conservation Strategy specifies several measures to ensure the continued recovery of grizzly bears in the NCDE. Several of those strategies apply to the Rumbling Owl Project and FWP anticipates the integration of those strategies as the project develops.

Thank you for the opportunity to comment on the Rumbling Owl Fuels Reduction Project. Montana Fish, Wildlife & Parks looks forward to collaborating with the Forest Service on project specifics as this proposal advances. If you have questions, please contact Kalispell Area Wildlife Biologist, Franz Ingelfinger: ingelfinger@mt.gov

Sincerely,

Lee Anderson

Region 1 Supervisor

Montana Fish, Wildlife & Parks