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Chris Dowling

US Forest Service

Swan Lake Ranger District

200 Ranger Station Road

Big Fork, MT 5991

RE Rumbling Owl Project

Mr. Dowling:

There are several questions and concerns with the proposed Rumbling Owl Project that I would like to address. First and foremost is the abbreviated timeline for public participation. Given the repeated and vociferous complaints over the lack of transparency with the POWDR Holland Lake Lodge controversy it seems unfortunate that you would limit or stifle public participation at Holland Lake again.

The project description notes there will be an increase in the roads in the project area, which is grizzly bear habitat. Will the USF&WS be allowed to comment on this proposal and how the increase in the number of miles of roads will impact the bears? Will your own agency wildlife biologists provide any comments on the increase in roads and the impacts on grizzly bears? It is difficult to determine exactly how many new miles of road will result. The text of the document states 8 miles of new roads, the table in the document appears to suggest only 1 mile of road. Will this project impact either the South Holland Lake Road or Holland Lake Road? Will these two roads be closed while the thinning and cutting activities are occurring? Was there a systematic inventory of culverts and some sort of ranking system to determine which culverts needed replacement? The number of culverts slated for replacement seems low.

Will this project remove any of the old growth Douglas fir or larch trees around Holland Lake? Will this treatment improve the stands of old growth trees? Will there be any follow up actions after the tree cutting? For example, will there be any proposed weed treatments, grass replanting, tree replanting, or pine beetle control activities after the thinning and cutting? The project will implement mechanical treatment methods around Holland Lake, would hand treatment actions be more appropriate and less impactful in these sensitive areas?

What impacts to the wildlife, especially deer and elk, be in the project area? This is prime winter grounds for both species. The project proposes utilizing intermediate cutting immediately adjacent to Holland Lake. Will the mechanized treatment result in increased sediments into Holland Lake? Will this treatment type result in an impact to the bull trout? Would hand thinning and cutting and burning in these areas be more appropriate?

The project maps show the Holland Lake campground and Lodge will be subjected to PCT, which I am assuming, is precommercial thinning activities. Will the campgrounds, day use area and beach, the boat launch and Lodge be closed while this cutting activity is occurring? It appears from the project maps that the area in and around the Holland Lake sewage lagoon is slated for seed tree treatment. Will this affect the operation of the sewage lagoon and will the sewage lagoon be operating during the treatment activity? Would hand thinning and burning be more appropriate in these areas instead of mechanical equipment?

The recreational residences on the south shore of Holland Lake were intentionally placed well back from the lake

shore, creating a visual break. Unlike other recreational tracts on Forest Service lands, the cabins were intentionally located away from the lake, which adds to the historic setting and qualities of Holland Lake. This setback and visual break are now part of the historic Holland Lake landscape. Will this action have an adverse impact to the historic landscape? Will the summer homes be screened with vegetation or will they be visible from the lake? Several of the summer homes utilize a spring located immediately adjacent to South Holland Lake Road, will this project take any special actions to avoid the springs or protect the springs in any manner?

Will this project impact any sites of concerns for the Native Americans? I am specifically referring to the location of the "Holland Lake Massacre" site. Will the tribes be consulted about these impacts? Has the Forest Archaeologist reviewed this project?

Finally, the use of the Emergency Action Determination authority seems to be a confrontational approach to a problem that really needs to be addressed. The lack of any vegetation management in and around Holland Lake for decades has created an untenable situation and we can all agree that some action is necessary. However, cooperation and transparency should be the order of the day in the aftermath of the Holland Lake Lodge controversy. I will of course, attend the public meeting in Condon later this month to learn more about this project. Thank you.

Sincerely

Daniel S. Hall