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U.S. Forest Service

Swan Lake Ranger District Attn: Christopher Dowling, Anthony Botello (Rumbling Owl fuels Reduction Project #64924)

200 Ranger Station Road

Bigfork, MT 59911

Dear Mr. Dowling, Mr. Botello

I am not opposed to logging or active and responsible forest management, but I do oppose the USFS proposal for the Rumbling Owl Fuels Reduction Project as the USFS proposal and EA lacks merit and specificity with regards to treatment plans and ignores numerous wildlife and environmental concerns. From my perspective the USFS is trying to sell the Rumbling Owl project to the public under the guise of "fuels reduction" and public safety but in reality, this is nothing more than an attempt for the USFS to justify and meet your Timber Harvest Targets.

The reality of this project is: it will not stop or eliminate the possibility of a catastrophic wildland fire in the Swan Valley. While it may decrease the intensity of a wildland fire, given favorable red flag conditions it will not stop a fire and prevent associated loss.

If the USFS really is concerned about loss of life and private property- resources would be better utilized thinning in proximity to private property and creating defensible space-Not, logging mature and old growth stands miles away. Grants for private property fuels reduction would be a better use of taxpayer dollars.

With the combined production from the Rumbling Owl and Mid-Swan Logging project, the USFS is sitting on a vast timber/lumber/wood products resource. With the closure of the mill in Seeley Lake where does the USFS or your contractors plan to sell all of this product? The Stolz mill in Columbia Falls is inundated with timber from the Flathead NF along with private sales. Will it be hauled to Deer Lodge which will greatly affect profitability of the sale? In short there is no viable market to justify the magnitude of the proposed cutting at this point in time. This proposal is not good economic use of our forest resources at this point in time.

In addition, based on USFS Cut and Sold Reports- The Flathead and Lolo NF have harvested more timber in the last ten years than in the previous three decades.

The USFS EA for the Rumbling Owl project fails to address the effect of the Rumbling Owl project on; fragmentation, connectivity and travel corridors as it relates to all wildlife of the Swan and more specifically endangers species such as grizzly bears, wolverines and lynx.

Then there is the issue of road construction of the combined Rumbling Owl/Mid Swan project and their negative effects. McLellen and Shackleton 1988 demonstrated that grizzly bears used habitat within 100m of logging roads significantly less than expected (regardless of traffic volume) resulting in a net habitat loss that bears were able to exploit for their survival.

The Rumbling Owl project also violates your own guidelines 36CFR-219 as it relates to Connectivity.

In addition, The USFS EA fails to address the following:

How will logging operations affect grizzly bear movements, distribution and mortality?

How will road density affect grizzly bear movements and mortality?

How will logging operations and associated disturbance and habitat fragmentation affect ungulate movement, density and mortality throughout the Swan Valley?

How much Old Growth (%) exists with the proposed logging unit(s) and what are the associated tree and animal species that will be affected by its removal?

How are old growth stands selected for harvest?

How are old growth stands within the proposed area related to travel corridors and connectivity of other key habitat such as riparian areas, thermal cover, winter range, and security cover?

How much of the afore mentioned habitat types are provided by old growth stands themselves?

How will air quality in the valley be affected and managed as a result prescribed burn treatments and logging slash clean-up? I can see this being very problematic from a public health standpoint given the size of this operation.

This is but a very short list of wildlife and environmental issues/concerns not addressed in your proposal for the Rumbling Owl Fuels Reduction project.

References:

Grizzly Bears and Resource-Extraction Industries: Effects of Roads on Behavior, Habitat Use and Demography
B. N. McLellan and D. M. Shackleton
Journal of Applied Ecology
Vol. 25, No. 2 (Aug., 1988), pp. 451-460 (10 pages)

Road and Trail Influences on Grizzly Bears and Black Bears in Northwest Montana
W.F. Kasworm and T.L. Manley; International Conference Bear Research and Management 8:79-84

Components of Grizzly Bear Habitat Selection: Density, Habitat, Roads and Mortality Risks
L.M. Ciarniello Et.al. J. of Wildlife Management 71(5):1446-1456, 2007

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