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Comments: The Southwestern Crown Collaborative (SWCC) would like to thank the USFS for their level of outreach during the formation of the Rumbling Owl Project.

We are generally supportive of the proposed alternative selected for the project including gravel pit restoration sites, road decommissioning, thinning in tree plantations, prescribed fire, and many of the mechanical fuel reduction treatments in the WUI.

Since the project area contains the largest contiguous patch of winter range habitat remaining in the Swan Valley, we urge the USFS to take careful consideration of leaving enough snow canopy intercept, thermal cover, and hiding cover connectivity within and between treated units. We appreciate the modifications to the project design to maintain winter range characteristics in the strip of timber just north of Holland Lake Road that runs east-west starting in the northern part of Section 04, going east through Section 34, and into Section 26.

We are pleased to see the commercial thinning prescription being considered for the plantations along the Owl Creek Road where the density of the trees of the same age and species well exceeds that of naturally occurring forest stands. We feel the results of this thinning will improve the vigor and resiliency of the resulting forest, and we suspect that this would fulfill the intent of the community volunteers who were involved years ago in planting the trees (it's likely that they wanted to eventually see a new forest of large, healthy trees). It would be nice to erect a new sign along the road once this commercial thinning is completed to recognize the contribution of those involved in establishing these plantations.

We believe that the suggested prescriptions for regeneration harvests to "reset" the old units from prior logging operations be reconsidered. These areas appear to have a complex set of vegetative components, including shrubs and remnant large trees, and these components may prove valuable habitat for wildlife populations. Removing too much canopy cover in these stands will reduce snow intercept and will likely degrade the quality of winter range for ungulates. Maintaining the quantity and quality of this winter range could be of significance to both residents and hunters. Further, there already appears to be at least modest advanced regeneration of common tree species in these old logging units, so there is potential for these stands to anchor a mosaic of multi-stored forest stands interspersed with the more even-aged stands occurring in other parts of the project area. Here again, our overarching concern about developing and prioritizing actions based on the long-term desired outcomes for this landscape come into play. There may be needs to initiate changes in the landscape patterns of species composition and structure in the Rumbling Owl project area, but these desired conditions have yet to be made explicit. Thus, the regeneration prescriptions for these old units seem ungrounded in a more comprehensive, integrated management framework. In our view, defining these longer-term goals for this landscape will be a vital first step before unit-level silvicultural prescriptions can be applied.

Thank you for your consideration.