



VIA Email: john.casselli@usda.gov

August 18, 2023

Coyote-Divide Vegetation Project #59803  
John Casselli  
1220 38<sup>th</sup> Street North  
Great Falls, MT 59405

Dear Project Leader:

This letter is on behalf of Sun Mountain Lumber in Deer Lodge, MT. We would like to thank you for the opportunity to provide scoping comments for the **Coyote-Divide Vegetation Project #59803**. Sun Mountain Lumber is a family-owned sawmill that provides direct employment for approximately 200 mill and logging jobs in Deer Lodge, MT. In addition to the potential of this Coyote-Divide Vegetation Project providing raw material for our operations, we view these types of projects as creating a relationship in which our operations can assist the Belt Creek-White Sulphur Springs Ranger District, Helena-Lewis and Clark National Forest in achieving their goals and objectives on NFS lands.

The Coyote-Divide Vegetation Project area encompasses about 36,500 acres. The project area is located in the Little Belt Mountains on the west side of Highway 89 between the communities of Neihart and Monarch, Montana. The Forest is proposing vegetation treatments including aspen restoration, fuel reduction, non-commercial thinning, and commercial timber harvest on approximately 8,449 acres in the Project area. Non-commercial treatments are proposed on approximately 1,483 acres. Commercial thinning and stand clearcutting are proposed on approximately 6,966 acres.

Sun Mountain Lumber supports the purpose and need of the Project which is: 1) Life Safety, 2) Forested Resiliency, Diversity and Restoration, 3) Wildland Urban Interface. Current analysis of existing conditions in the project area reveals conditions that are not within the known historic ecological range of variability. The proposed Coyote Divide Project addresses a critical need to bridge the gap between the current and desired vegetation conditions in the project area. This will allow the Forest to accomplish Forest Plan goals and objectives for managing fuels, recreation, vegetation, watershed, aquatic and terrestrial wildlife resources over the approximately 8,449 acres. However, we would encourage looking at more than 24% of the approximate 36,500-acre project area for commercial and mechanical opportunities. Recovery of these values may in turn allow

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the Forest to achieve those goals that provide ecological benefits without economic returns.

Additionally, we would like you to explore opportunities to recover merchantable timber while reducing fuels for prescribed fire.

This project would provide infrastructure benefits in the form of much needed maintenance and bringing roads up to the standards of *Montana's Best Management Practices*. We support the responsible reduction in road densities and associated sedimentation. Specifically, when these densities are caused by clandestine or poorly planned roads. Please explore options for decommissioning roads in an economically viable fashion.

Lastly, whenever possible, carefully consider timing of operation restrictions and allow flexibility for operators.

Thank you for the opportunity to comment and I look forward to more projects.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Sean Steinebach', with a stylized, flowing script.

Sean Steinebach  
Outreach Forester  
Sun Mountain Lumber  
181 Greenhouse Road  
Deer Lodge, MT 59722