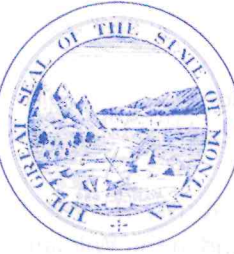


DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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August 26, 2023

Helen Smith, District Ranger
Belt Creek-White Sulphur Springs Ranger District
204 W. Folsom
P.O. Box A
White Sulphur Springs, MT 59645

Re: Montana Department of Natural Resources and Conservation, Comments on the
Coyote-Divide Preliminary Environmental Assessment

Dear Ms. Smith,

Thank you for the opportunity to comment on the Preliminary Environmental Assessment for the Coyote Divide Project. The Department of Natural Resources and Conservation (DNRC) manages State Trust Lands in this area and assists private landowners with treatments on their lands. DNRC has fire protection interests in this area. Our agencies share the common goals of reducing wildfire risk, improving forest health, and retaining a strong forest products industry in Montana.

This project is located on the west side of Highway 89 between the communities of Monarch and Neihart in the Little Belt Mountains. About 70% of the project area lies in Cascade County and 30% in Meagher County. This area was identified as a priority planning area for the Forest as part of the overall Forest Landscape Prioritization process completed in August 2018.

The project area is in a Farm Bill Priority Landscape designated by the governor due to risk to uncharacteristic Insect and Disease impacts. Portions of the area are identified Priority Areas for Focused Attention in the Montana Forest Action Plan due to risk of insect and disease impacts. Most of the planning area is in the Wildland Urban Interface (WUI) identified by Cascade County in their 2008 Community Wildfire Protection Plan (CWPP). There are values at risk on private lands within and near the communities of Neihart and Monarch and also with the Belt Creek Ranger Station.

DNRC supports the Proposed Action Alternative which includes an array of vegetation treatments on a total of 8,074 acres of national forest lands. DNRC supports the treatments proposed in Inventoried Roadless Areas (IRA's) as the treatments would fit exceptions in the Roadless Rule. DNRC supports the proposed exemption of opening size to allow for the development of more natural stand patterns and patch size in the landscape.

The treatments in the Proposed Action will:

- Improve conditions for public and firefighter safety.

- Develop and maintain forest and rangeland conditions across the landscape.
- Improve the components of forest health to promote resiliency to disturbances including insects, disease, fire, and drought.
- Maintain and enhance ecological integrity of terrestrial vegetation.
- Promote natural openings and fire-resistant tree species within open-grown forested stands that can be maintained in a low fire hazard condition.
- Reduce hazardous fuels and wildfire threats to identified values at risk, in particular the north end of the project area from Belt Park Road to Monarch and in the Wildland Urban Interface (WUI) near Neihart.

Only the Proposed Action Alternative would improve forest health and reduce wildfire risk in this landscape. The No Action Alternative would maintain the existing condition and not address the serious insect and disease and wildfire risk in this area. The treatments proposed and effects analysis are thorough and accurate. The EA presents a strong basis for action in this area and DNRC's interests in cross-boundary forest health improvement and wildfire risk reduction are met strongly with this alternative. The Proposed Action will reduce the risk on neighboring state and private lands as well as on national forest lands.

Regarding the issue of effects on carbon stores and impacts of carbons change: studies are showing that carbon in Montana's forests is declining. The widespread loss of forest cover through severe wildfires is the greatest threat to loss of carbon stored and sequestered in western forests. High severity burns result in long term loss of forest cover and associated plant and animal communities dependent on forest ecosystems. The best strategy for adapting landscapes is to actively manage forest vegetation for reduced tree density and diverse structure and composition. A mosaic of diverse stands will accommodate returning fire to the landscape through prescribed burning and allow for safe and effective management of wildfires to reduce severity and scale of impacts. The EA states that Forest management will have little impact overall on a potential future scenario of carbon accumulation and loss. However, it is clear that forest treatments that provide for more effective fire suppression and less severe wildfires can play a role in reducing large scale loss of forest cover and carbon.

DNRC is committed to continuing a positive working relationship with the Helena-Lewis and Clark National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By working together we can more effectively work towards an "all lands" approach to forest management and restoration benefiting both agencies' missions.



Hoyt Richards
Area Manager, Central Lands Office

Cc: Objection Reviewing Officer, USDA Forest Service Northern Region;
Heidi Crum, Helena Unit Manager; Stephen Kimball, Local Government Forest Advisor