Electronic Comment: https://www.fs.usda.gov/project/?project=5980303

August 8, 2023

Helen Smith, District Ranger
Helena-Lewis and Clark National Forest
204 W. Folsom, P.O. Box A
White Sulphur Springs, MT 59645

RE: Coyote Divide Preliminary Assessment Comments

Dear Ms. Smith:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Coyote Divide Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Helena-Lewis and Clark National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Coyote Divide Project area is approximately 36,500 acres. Roughly 70% of the project area lies in Cascade County and 30% lies in Meagher County. The project is located on the westside of Highway 89 (a scenic by-way) between the communities of Monarch and Neihart, Montana in the Little Belt Mountains. AFRC is very familiar with this landscape area, since we reviewed the Moose Creek and Horsefly Projects which are located near Highway 89 but south of Kings Hill Pass. AFRC submitted scoping comments on the Coyote Divide Project on October 3, 2022 and we strongly support the Project moving forward as we did for the Horsefly and Moose Creek Projects. In fact, AFRC is a defendant-intervenor in the Horsefly lawsuit which is still awaiting a decision from the Court. The timber lands in these areas are dominated by lodgepole pine which have been impacted heavily by mountain pine beetle

infestations causing severe mortality in the timber. This infestation has left a landscape dominated by standing and fallen dead and dying lodgepole that needs to be addressed. Below are two photographs that mirror the current conditions on Coyote Divide. The dead grey lodgepole can be seen across the hillside in the upper photograph. The lower picture shows the heavy volume of fallen over dead lodgepole from inside the stand. These landscapes need treatment for many reasons. The Douglas-fir in the area has also been impacted by insects, especially Douglas-fir Tussock Moth and these impacted stands would also benefit from active management.

AFRC strongly supports the Purpose and Need for the Project which include:

Life Safety
Improve conditions for public and firefighter safety across the landscape in the event of a wildfire, as every wildland fire requires an appropriate management response based on management direction.

Forested Resiliency, Diversity, and Restoration
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 through maintaining existing seral species and increasing or restoring their overall representation across the landscape.

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.

Wildland Urban Interface
Reduce the threat of catastrophic wildfire by reducing hazardous fuel loads in the Wildland Urban Interface, prioritizing the Belt Park Road area and the Monarch to Neihart Highway corridor.

While AFRC supports the Purpose and Need for the Project, we offer the following suggestions that we hope are incorporated into the final decision.

1. AFRC strongly believes that an additional Purpose and Need should be added to emphasize the importance of the forest products industry and that the wood from the project area will ensure the industry's survivability. The closure of the Townsend sawmill is an indication of how important raw materials from the National Forests are. Our members depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Coyote Divide Project are unlikely to directly address this long-term sustainability concern, they will likely provide short-term products for the local industry, and we want to ensure that this provision is an important consideration for the decision maker as the Project progresses. As we will discuss later in this letter the importance of our members' ability to harvest and remove these timber products from the timber sales generated by this Project is paramount. We would like the Forest Service to recognize this importance by **adding economic viability & support to the local infrastructure to the purpose and need** of the Coyote Divide Project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

   Furthermore, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills.

   Additionally, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about $300 million annually. Much of the industry is centered in western Montana, and this Project is crucial to the infrastructure located in and around the Helena-Lewis and Clark National Forest.

2. AFRC is disappointed that the District has reduced the acres planned for treatment from 8,450 acres (24%) of the approximate 36,500-acre project area to 8,074 acres or 22%. AFRC would like to encourage the District to look at ALL opportunities to maximize acres treated commercially. Having a positive and strong commercial component could

ensure economic viability, lower overall NEPA costs by treating more acres under the same assessment, and finally generating more sawlogs for the forest products industry that depend on timber from the National Forests.

3. Harvest methods for tree removal in units with commercial products would include ground based mechanized harvest including whole tree yarding to remove material from the stand to a landing pile and excavator piling to pile activity generated and natural fuels. Skyline logging is also called for in several units. As we will outline further below, we generally urge the Forest Service to incorporate design features in the EA that are flexible and adaptable to a range of operators.

   AFRC would like to remind the District that there are many ways to design a timber sale that enables a purchaser to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts.

   We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Helena-Lewis and Clark National Forest market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. We appreciate the language allowing ground skidding to occur on slopes over 35% if approved, we would like the Forest to allow ground-based equipment to operate on slopes up to 45% or steeper. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable, safe, and available option for felling and yarding on steep slopes. This equipment has been shown to contribute negligible ground disturbance when compared to traditional cable systems. The weight

displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the west have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. It would be helpful if you would prepare your NEPA analysis documents in a manner that will facilitate this type of equipment. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. **We urge the District to consider allowing this equipment to be used where appropriate on the Coyote Divide to mitigate implementation obstacles.** Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

4. AFRC suggests that the District be flexible regarding merchantability standards for this Project due to the dead and dying material. Having prices for both saw and non-saw log material is important, and helpful to use weight scale as the preferred method for scaling. Also, when material is utilized as firewood, we suggest a fixed truckload rate for this instead of needing to weigh each truckload.

5. The Draft EA proposes regeneration treatments that would create a variety of patch sizes to help achieve desired conditions and in some cases would create openings larger than 75 acres in size, which is permitted under the Forest Plan. These larger openings mimic natural patch sizes, and the Forest would seek Regional Forester approval to exceed the maximum opening size limit. Using this exception also requires that the Forest provides the public a review period of 60 days specific to plans to exceed the maximum opening size of 75 acres. AFRC supports the District using the larger openings and we would like this letter to also support the 60-day notice for these treatments.

6. In units where regeneration harvests will not be used, AFRC believes that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, improvement cuts, and shelterwood harvests. Prescriptions can be written to accomplish the goal of the Project of removing dead and dying trees while leaving the healthy more resilient trees. We also encourage the District to reduce stocking in these units down to 40 sq.ft. of basal area to promote tree vigor and reduce fuels. This is especially true in lands included in the Wildland Urban Interface where fuels reduction is paramount.

7. AFRC supports the proposed action which would commercially treat approximately 315 acres identified as old growth. As described in the Assumptions section, silvicultural prescriptions would be site-specific for each unit and would prescribe retention of all

minimum old growth attributes and available associated characteristics in stands that are in intermediate harvest units.

8. AFRC has concerns with how the District describes the No Action Alternative: "*In the no action alternative, forest conditions would remain unchanged from their present state and would only be subject to changes from natural processes such as succession and disturbance. Late seral and shade-tolerant species would be expected to increase while early seral species would continue to decrease. Tree size and density would be expected to increase over time in the absence of stand altering disturbance."*

   In our opinion, a likely result of the No Action Alternative could be the exacerbation of forest mortality and loss of late seral species due to the high risk of fire. The District should consider noting that the No Action Alternative will likely continue the trend of unhealthy dead and dying forests, and the only way to improve these is for active management. The District is incorrect if they believe that not treating a stand will allow it to flourish, grow to larger diameter sizes and stay healthy. Active management is the only viable option to bring these forests back into a healthy and resilient state.

9. AFRC supports treatment in small portions of two Inventoried Roadless Areas (IRA). The Project would cover approximately 799 acres in the Pilgrim Creek IRA and approximately 34 acres in the Calf Creek IRA. These acreages are both lower than what was proposed in the scoping information. Preliminary project review suggests that this project would meet one or more exceptions under the 2001 IRA Rule for allowing vegetation treatment, tree cutting, or prescribed fire use within IRAs in the project area. Treatments would follow the guidelines put forth in the 2001 directions.

10. AFRC supports the travel management plan that is listed below:

Table 2 Road work associated with the project

Road Management	Approximate Miles
New Construction of Temporary Road	19.9
Temporary Road Reconstruction	3.9
Reconditioning of System Road	17.3
Reconstruction of System Road	14.0
Haul Route on Non-NFS Road	4.0*
Total Miles of Haul Routes	**59.1**

Table 3 Unauthorized Route Removal

Routes to Obliterate	Approximate Miles
Travel plan implementation	82.5
Temporary project use for haul to be Closed (fully stabilized/obliterated) following use.	24.0

The District is planning to use approximately 59.1 miles of system roads for log haul.

Regarding the 24 miles of roads to be fully stabilized/obliterated after us, we want to point out that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Coyote Divide scoping notice likely represents a ***permanent*** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Coyote Divide project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

a. Determination of any potential resource risk related to a road segment.
b. Determination of the access value provided by a road segment.
c. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

Additionally, AFRC believes that a significant factor contributing to increased fire activity in the Region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

AFRC understands that there are limits on the number of miles of roads that may be open in a project area when dealing with wildlife species such as the Grizzly bear. We would prefer that if the Forest Service proposes to decommission, abandon, or obliterate road segments from the Coyote Divide planning area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable firefighters to have quicker and safer access to suppress any fires that are ignited.

11. AFRC strongly supports the use of shaded fuel breaks along these identified roads to not only provide fuel breaks along ingress and egress for the WUI, but also to provide wood products for the milling infrastructure. We further recommend treating a minimum of 200 feet on each side of the roads and thinning to wide spacings again leaving only 40 sq. ft. of basal area.

12. AFRC appreciates the analysis describing the impacts to certain species of wildlife, which we believe effectively captures the proposed treatment impacts. Should the action alternative be selected, the Forest would:

    - Treat approximately 641 acres of snowshoe hare habitat, as allowed by the NRLMD to treat hazardous fuels in the wildland urban interface.
    - Temporarily impact grizzly bear secure habitat occurring between Belt Park Road and MT Hwy 89.
    - Temporarily impact elk security and habitat effectiveness, primarily in the area between Belt Park Road and MT Hwy 89.
    - Temporarily disturb individual wolverine due to increases in human presence and mechanical operations.

    The table below illustrates that these primary impacts to lynx, grizzly bear, wolverine, and elk would be temporary and not long-lasting. None of these impacts would violate Forest Plan standards or guidelines, and they would not preclude achievement of Forest Plan desired conditions.

Table 6 Summary of preliminary analysis determinations

Issue or Species	No Action Alternative	Proposed Action
Terrestrial wildlife diversity	Would not preclude achievement of Forest Plan direction related to terrestrial wildlife diversity	Would not preclude achievement of Forest Plan direction related to terrestrial wildlife diversity
Elk	Would not preclude achievement of Forest Plan direction related to elk	Would not preclude achievement of Forest Plan direction related to elk
Terrestrial Wildlife Species At Risk		
Canada lynx	No effect	May affect, but would not likely adversely affect
Canada lynx designated critical habitat	Not present in the Little Belts Geographic Area	Not present in the Little Belts Geographic Area
Grizzly bear	No effect	May affect, and would likely adversely affect
Wolverine	No effect	Would not jeopardize the continued existence of the North American wolverine DPS
Flammulated owl	Species or habitat not present[1]- no analysis or discussion warranted	Species or habitat not present[2]- no analysis or discussion warranted
Lewis's woodpecker	Species or habitat not present[5]- no analysis or discussion warranted	Species or habitat not present[5]- no analysis or discussion warranted

13. AFRC applauds the discussion in the Draft EA regarding carbon and climate impacts which states: *"The proposed Coyote Divide Project impacts a relatively small amount of forest land and carbon on the Forest and would not measurably change carbon relative to national and global scales. The Coyote Divide Project will not convert forestland to other non-forest uses. Carbon initially emitted as a result of the project would have a temporary influence on atmospheric concentrations as forest growth and regrowth continues to uptake carbon. Wildfire is the greatest disturbance factor accounting for 76 to 82 percent of the total non-soil carbon lost from the Forest. Insects and harvest combined account for the remaining 18 to 24 percent of total non-soil carbon loss. Forest management will have little impact overall on a potential future scenario of carbon accumulation and loss. Commercial timber harvest can provide for long-term carbon storage off-site in harvested wood products."*

    We believe the abundance of dead lodgepole scattered across the project area has created a potential carbon source since dead trees cannot sequester carbon, they can only emit carbon. We think storing the fiber on the landscape into wood products through timber harvest followed by reforestation could turn this source into a sink. As you prepare your EA, please consider several documents related to climate change and carbon sequestration related to forest management.

Please consider the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

a. Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).
b. Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
c. Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
d. Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to "stack" carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the Coyote Divide project analysis.**

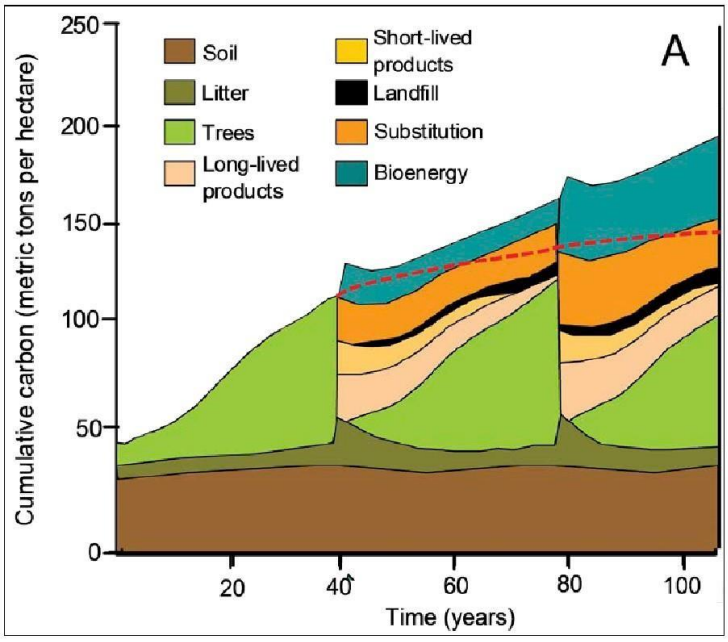

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by "stacking" storage in wood products and regrowth of newly planted trees.

We would like to encourage the Tally Lake District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

In the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes resulting in dead trees that would decay over time, emitting carbon to the atmosphere. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavasson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the

forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., KlÖhn, S., … Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. Mitigation and Adaptation Strategies for Global Change, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, Carbon Management, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. Ecological Applications. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: Climate Change and United States Forests, Advances in Global Change Research 57 2014; pp. 151-182.

Thank you for the opportunity to provide Preliminary Assessment comments for the Coyote Divide Project. We look forward to following this Project as it moves to the Draft EA phase.

Sincerely,

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