



VIA Link: <https://www.fs.usda.gov/project/?project=5980303>

June 25, 2024

Reviewing Officer
Northern Regional Office
Attn: Coyote-Divide
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Coyote Divide Project during the Objection Period.

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.

AFRC is not writing to object to the Project, rather we are writing to support the Project going forward despite a lack of support with certain components of the Draft Decision. AFRC provided scoping comments on October 3, 2022, and Draft EA comments on August 23, 2023

Reasons for AFRC's Support of the Coyote Divide Project

1. While the number of acres being treated commercially has been reduced it is very important for the Project to move forward to support the existing milling infrastructure that depends on the raw materials from National Forest lands for their existence. The final plan outlines that 2,590 acres will be treated commercially yielding about 20 mmbf.

Events in recent months have increased the importance of this Project moving forward quickly. Litigation on the Middleman Project has caused much of the timber volume to be dropped. Litigation on the Horsefly Project has halted that Project for nearly two years. For fiscal year 2024, the Helena-Lewis and Clark will offer less than 10 mmbf. The Forest needs to implement the Coyote Divide Project to not only restore and fireproof the Forest, but to also provide needed raw materials to the existing infrastructure.

In our scoping and Draft EA comments we emphasized the importance of the forest products industry and that the timber from the project area will ensure the industry's survivability. The closures of both Pyramid Lumber and the R-Y sawmill in Townsend are 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 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. 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 healthy 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. The Forest is at extreme risk of wildfire due to dead and dying lodgepole that is either standing dead or down dead creating heavy fuels and extreme wildfire risk. The pictures below exemplify the extreme conditions found on the ground from an AFRC visit. Over 60 percent of the total Project has been identified as Wildland Urban Interface from current County Wildfire Protection Plans. Communities at risk include the cities of Neihart and Monarch, Montana.





The Forest recognized this threat by including the need on this project to 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.

3. AFRC supports the proposed action which would commercially treat approximately 251 acres classified as old growth. As described in the Assumptions section, silvicultural prescriptions would be site-specific for each unit and would prescribe retention of old growth attributes and available associated characteristics in stands that are in intermediate harvest units. (120 acres of even aged regeneration, 125 acres of two-aged Regeneration and 4.6 acres of whitebark pine restoration.)
4. Treatment in the Inventories Roadless Areas (IRA) is needed for fuels reduction to prevent the spread of wildfires that originate in the IRA. The Coyote Divide Project proposes to conduct management activities on approximately 834 acres within IRAs. Within the Calf Creek IRA, approximately 35 acres are proposed to be treated. This includes approximately 31 acres of meadow restoration hand treatments and three acres of hand thinning for fuels reduction. Within the Pilgrim Creek IRA, approximately 799 acres are proposed to be treated for fuels reduction via hand thinning. The proposed treatments comply with the 2001 Roadless Rule as no road construction will be required to complete proposed treatment activities. Proposed treatments are designed to mimic natural disturbance regimes and will not cause habitat fragmentation or loss of roadless area values or characteristics.
5. AFRC supports the travel management plan that is listed below:

Table 2 Road Work

Road Management	Approximate Miles
Construction of Temporary Road	16.1
Temporary Road (Reconstruction on existing template)	2.7
Reconditioning of System Road	28.6
Reconstruction of System Road	14.0
Routes on non-NFS Road	2.0*
Total Miles	63.4
Total Miles of Haul Routes	63.3

*Under road use agreement (only 1.9 miles used for haul)

Table 3 Unauthorized and Temporary Route Removal

Routes to Obliterate	Approximate Miles
Travel plan implementation (2007)	100
Temporary project use to be Closed (fully stabilized/obliterated) following use.	21

The District is planning to use approximately 63.3 miles of system road compared to 59.1 miles of system roads in the Draft EA for log haul. Regarding the 21 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; and 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 ignited.

6. AFRC believes the discussion in the Draft EA regarding carbon and climate impacts has been well done. The Forest 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.”*
7. AFRC appreciates the analysis describing the impacts to certain species of wildlife, which we believe effectively captures the proposed treatment impacts. 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 7 Summary of 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
Canada lynx	No effect	May affect, and 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	May affect, and would not likely adversely affect
Flammulated owl	Species or habitat not present – no analysis or discussion warranted	Species or habitat not present – no analysis or discussion warranted
Lewis's woodpecker	Species or habitat not present ⁶ – no analysis or discussion warranted	Species or habitat not present – no analysis or discussion warranted
Whitebark pine	No effect	May affect – is likely to adversely affect

8. AFRC continues to support 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.
9. 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.

During implementation of this Project, 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. 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.

10. Implementing the Coyote Divide Project will yield numerous positive outcomes. Not implementing the Project, or implementing it at a reduced scale, will leave the area prone to insects, disease, and wildfire in the long-term. That is why in our earlier comments we mentioned that 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."*

The Forest needs to expand on the fire and forest health risks associated with taking no action, not only for Coyote Divide, but for other projects being analyzed.

Thank you for the opportunity to provide supportive comments for the Coyote Divide Project to move forward out of the Objection Period. We hope that Projects from this EA will be available in fiscal year 2025.

Sincerely,



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