

File Code: 1570

Date: September 16, 2024

Dear Objectors:

This letter is in response to objections filed on the Coyote-Divide project EA and Draft Decision Notice released by Helen Smith, District Ranger of the Belt Creek-White Sulphur Springs Ranger District on the Helena-Lewis and Clark National Forest. I have read your objections and reviewed the project record. My review of your objections was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

ADMINISTRATIVE REVIEW PROCESS

The regulations at 36 CFR 218.8 provide for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections.

In my review, I considered a variety of issues identified by objectors under the National Environmental Policy Act, the National Forest Management Act, the Endangered Species Act, the travel management regulations at 36 CFR 212 subpart B, old growth guidance, CEQ guidelines on the consideration of greenhouse gas emissions, the Administrative Procedures Act, and associated regulations and policies.

OBJECTION RESOLUTION MEETING

I offered to host an objection resolution meeting to create space for objectors to discuss the issues they raised and propose potential remedies. None of the lead objectors accepted my invitation to meet.

RESPONSE TO OBJECTIONS AS REQUIRED BY 36 CFR 218.11(b)

After my review of the EA, Draft Decision Notice, and project record, I find the responsible official provided an adequate analysis of issues raised and provided acceptable documentation showing compliance with applicable law, regulation, and policy. However, your objections identified some areas within the project record, EA, and Draft Decision Notice that can be clarified or updated with clearer connections and references to existing data and completed analyses.



More specifically, I am instructing District Ranger Smith to ensure the following actions are taken before project implementation:

- Clarify in your decision that the haul route selected will avoid/ mitigate impacts to winter recreation.
- Connect the changes in the haul routes with the resulting updated feasibility analysis to clarify the economic analysis and feasibility.
- Clarify the closed or decommissioned state of roads as called for in the 2007 Little Belt, Castles, north-half Crazy Mountains Travel Plan Record of Decision as well as plans for closure of known unauthorized routes.
- Clarify in your decision that all lodgepole pine stands identified as old growth will not be included in the regeneration harvest treatment areas. Design feature Vegetation-2 is thus no longer relevant.
- Clarify or better demonstrate the reduced risk of uncharacteristically severe wildfire.
- Document consideration of all peer-reviewed literature submitted for consideration in comment letters.
- Provide a written rationale for how the project fits within the Meagher and Cascade County Wildfire Protection Plans Wildland-Urban Interface (WUI) and how the treatments authorized to be exempt under Northern Rockies Lynx Management Direction meet the Healthy Forests Restoration Act definition.
- Ensure that the data in wildlife report tables 14 and 15 is consistent and accurate.

In addition, while not required by the 2021 Helena-Lewis and Clark Forest Plan, Ranger Smith nevertheless had her team address the impacts from potential unauthorized road use in the analysis for elk as it relates to habitat effectiveness and elk security. I also note that the State is responsible for managing elk populations and supports the work that the responsible official is proposing in this project area as documented in the project record.

Solutions recommended in the objection letters included selecting the no action alternative or withdrawing the project. However, the responsible official can neither meet the 2021 Forest Plan's desired conditions or meet the purpose and need of this project without some active management in the area. Without some active management, the project area has the potential to burn at a higher severity (i.e. greater levels of forest mortality and more resistance to control/ management) than it would have historically because of dense and continuous forest and high levels of surface and ladder fuels. See the Little Belts Landscape Assessment (Vegetation Departure and Wildfire Threat Report) in the project record. The many hundreds of small and medium-sized wildfires

the Forest have suppressed in the Little Belt Mountains over the past hundred years would have created patchiness in the forested conditions with more openings that would have significantly altered how wildfires burn across the landscape. The Helena-Lewis and Clark National Forest is working to get back to a more natural landscape pattern so that wildfire may once again play a more natural role in shaping the ecological conditions.

One objection letter suggests that the Forest has not analyzed how the desired conditions will maintain wildlife habitat. The project effects are tiered to the analysis in the FEIS for the 2021 Forest Plan, thus I find they are adequately addressed.

Objectors shared concerns about managing inventoried roadless areas and impacts of fuels reduction work on wildlife. The record demonstrates inventoried roadless areas have been no less affected by wildfire suppression than other areas of the landscape. As conditions are outside the natural range of variability, they may burn in larger patches of high severity than they would have in the past, leaving behind larger areas of dead forest than would have been seen historically from wildfire. The loss of wildlife habitat in the medium and long term is much greater from high severity wildfires than from the limited and relatively small levels of management proposed in projects such as this one as documented in the project record. One objector suggested that wildlife are dependent on unlogged forests. As indicated in the record, this depends on which wildlife species one is considering and their life history needs. A variety of types, ages and structural conditions of forest are needed to adequately cover the needs of local wildlife species. Moreover, local wildlife species evolved in an area with active disturbance from both wildfire and insect mortality, so these species evolved in a much more heterogeneous, patchy landscape than the homogenous, contiguous forests that cover much of the Little Belt Mountains today. Dropping inventoried roadless areas from the project as suggested by one objection letter would leave us further from achieving the desired conditions outlined in the 2021 Forest Plan.

Objectors are concerned about potential impacts to grizzly bear and Canada lynx. Our biological assessment covers those topics in depth, and the U.S. Fish and Wildlife Service has concurred with our analysis.

One objection letter suggests the Forest is failing to manage for goshawk. The project is consistent with the 2021 Forest Plan, which provides integrated plan direction to provide the ecological conditions for the native species of the plan area, including raptors. The wildlife report (Table 2) identifies Project Design Features, consistent with Forest Plan components, that will ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Additionally, the wildlife report includes an analysis of impacts to terrestrial wildlife diversity, including raptors.

Objectors are further concerned about potential impacts to whitebark pine and suggest the responsible official did not conduct surveys. However, surveys were conducted for whitebark pine, and I spent significant time with the ranger and project specialists talking about potential impacts to whitebark pine. The Forest is committed to not only limiting impacts to whitebark pine but to helping recover the species. I am comfortable with the minor and limited impacts to seedlings that may occur from the project (far less than the estimates calculated in one objection letter) as it will occur in areas that are not prime or ideal for whitebark recovery. I appreciate and share your concern for whitebark pine and would be happy to talk more about how to best recover whitebark pine across the Forest. A field tour or meeting could be arranged if there is interest by contacting District Ranger Helen Smith or Forest Supervisor Emily Platt.

Objectors raise concerns about climate change, including concerns about thermal biology and impacts to wildlife and birds in particular. However, objectors fail to take into account the critical landscape context described in the environmental assessment. Of a 36,400 acre project area, only approximately 8,000 acres will be managed. Of these 8,000 acres, about 3,600 acres are within the O'Brien Creek Municipal Watershed and approximately 6,500 acres are in identified Wildland Urban Interface. Outside of the project area, hundreds of thousands of unmanaged acres remain. Dense, forested areas will remain plentiful and available to birds and wildlife. The references to deforestation provided with objections are not applicable as they refer to conversion of forest land to a non-forested use, which is not the type of management proposed by this project. Further, one objection letter suggests the Forest hasn't accepted the risk that climate change presents. The record demonstrates the responsible official considered scientific information showing the largest contributor of non-soil carbon loss to be from wildfires (76-82% between 1990 and 2011) across the Forest. During this same time, the remaining loss of non-forest carbon was equally split between timber harvest and insect activity. The environmental assessment indicates forested conditions are not stable and will not last in the medium and long term. The record demonstrates that active management that includes fuels reduction and prescribed fire will preserve more forest over the medium and long term than doing nothing/ the no action alternative.

While objectors expressed a concern that removing trees removes carbon, it's important to note that managing carbon is not as simple as that. As the record demonstrates, the current levels of carbon on the landscape are not stable. Research is showing the importance of stable carbon rather than just simple carbon stored at a single moment in time, particularly in frequent disturbance landscapes such as the Helena-Lewis and Clark National Forest.

One objector referred to requirements under the 1982 NFMA regulations. However, those no longer apply because there were replaced by the 2012 NFMA regulations and the resultant 2021 Helena-Lewis and Clark Forest Plan.

Before concluding, I will address scientific integrity. Objection letters referenced many reports and news articles that are not peer-reviewed. While such information could be useful on cutting edge issues where no peer-reviewed literature exists, that is not the case for fire science where there is a robust body of science indicating fuels management work is successful in reducing the risk of high severity wildfire, as disclosed in the environmental assessment. While information and scientific information provided by objectors may still be relevant and important for the interdisciplinary team to review, the responsible official must consider them in the larger context of the full body of literature. In many cases, the scale of the research (e.g., Baker and Della Sala) may be what lead these authors to different conclusions than are found by the majority of fire scientists. Many other articles cited by the objectors, such as Schoenagel et al. (2004), are relevant and entirely aligned with the 2021 Forest Plan and the Coyote Divide project. Finally, it's important to note the responsible official is not trying to "reduce the threat of forest fires". Wildfires are a natural part of the landscapes the Agency manages and will continue to shape them into the future. The Coyote Divide project is intended to reduce the severity of wildfire on this landscape when it occurs and maintain more live forest over time than without active management. It is intended to change *how* wildfires burn across our landscapes and impact communities.

I appreciate the comment about the usefulness of including measures of resilience, fire risk and forest health. While much of this information can be found in the 2021 Forest Plan, the responsible official can do a better job translating it at the project level. As the reviewing official on the Forest, I will ensure this idea is carried into future projects on the Forest. The diversity of age classes measure suggested is already present in the 2021 Forest Plan.

CONCLUSION

My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,



Emily Platt
Forest Supervisor

cc: Helen Smith, Kristopher Cahoon, John Casselli