



**VIA Link:** <http://www.fs.usda.gov/project/?project=64354>

August 15, 2023

Trojan Defense Project  
Three Rivers Ranger District  
12858 US Hwy 2  
Troy, MT 59935

Dear Project Manager:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Trojan Defense Vegetation Management Project (Trojan Defense 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 Kootenai 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 writing to voice our strong support for the Trojan Defense Project. The project area is located within the Wildfire Crisis Strategy – Kootenai Complex and the Lincoln County Wildland Urban Interface (WUI) which was designated to treat hazardous fuels surrounding the community of Troy. This project will be designed as part of ongoing cross-boundary efforts to connect past, present, and future activities to reduce and mitigate wildfire threats to the Troy community.

The area around Troy has seen several potentially destructive wildfires in the past few years that could have been much more severe. Steps need to be taken quickly to reduce fuel in the WUI and protect the area in and around Troy. The County has recognized the severity of the situation by including Troy in the Kootenai Complex and Lincoln County WUI. The project area

is entirely within the 2023 Lincoln County Community Wildfire Protection Plan WUI and the Kootenai Complex.

While we support the Project, we offer the following suggestions that we would like to see incorporated into your analysis.

1. We would like the Project's purpose and need to include providing needed raw materials to the surrounding sawmills that depend on the Kootenai for their resources. As you know, implementation of several large projects have recently been delayed due to litigation and the projected timber volume for sale has been drastically reduced. Projects like Trojan Defense can provide critical volume for timber dependent mills that have the capacity to assist with the fuel reduction treatments outlined in the scoping notice.

Our members depend on a predictable and economical supply of timber products off 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 important 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 Trojan Defense 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 Project's purpose and need.** 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 also 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 Kootenai National Forest.

2. The District asked for feedback on the following points, which are provided below.

- What would you like to see done to reduce hazardous fuel loading and potential fire severity? **AFRC would like to see the District treat all of the acres within the Trojan Defense Project commercially where appropriate. We would like to see basal areas reduced to 40 sq.ft. where thinnings will be used and regeneration harvests used in areas where severe forest health issues are present.**

We believe that there is scientific consensus that forest management, including commercial thinning, can mitigate the risk of high-intensity wildfire if implemented correctly. Please review and consider a new study published by Johnston et al that focuses on the benefits of mechanical thinning in regards to wildfire mitigation.

Johnston, James D., Olszewski, Julia H., Miller, Becky A., Schmidt, Micah R., Vernon, Michael J., Ellsworth, Lisa M. Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest. *Forestry and Ecology*. 501 (2021) 119674

Key points of the Johnston paper include:

- Mechanical thinning can moderate fire behavior in the absence of prescribed fire.
  - Modeled crown fire potential declined immediately following thinning, undoubtedly due to significant reductions of ladder fuels that carry fire into the crown and crown density that facilitates spread between crowns.
  - Increase in surface fuel and modeled fire behavior was offset by a steady decline in litter and a dramatic decline in duff over time
  - Fuel loading in a dry ponderosa pine forest increased for a year or two after thinning and then declined.
  - Woody fuel particles increased somewhat following thinning but litter and duff fuel loading declined dramatically as a result of thinning.
- What would you like to see done to improve opportunities for firefighters to safely engage wildfires within the project area? **AFRC believes that broad fuels reduction treatments across the area thinning to low basal areas will greatly benefit firefighter efforts in suppression activities. We would also like to see shaded fuel breaks put in along all ingress and egress routes within the project area. This will give firefighters solid lines of defense to work from and provide safety routes for local residents in case of large fires.**

**We would like to see the Forest Service maintain and improve its existing road infrastructure to enable quick and effective suppression of nascent fires. We**

believe that an intact road system is critical to enabling safe and effective suppression of nascent fires. This includes the removal of hazard trees that could pose a threat to firefighters utilizing the road network for suppression activities. Such hazards should be removed as soon as possible so suppression forces are not distracted with hazard abatement activities during a crisis.

- What would you like to see done to maintain and/or improve forest health, ecological function, and resource conditions? The District needs to aggressively reduce the number of trees per acre that currently exist in the area and try to establish a stands of fire-resistant species such as western larch and pine. That means removing the shade tolerant species that have encroached during the absence of fire and mechanical treatments.
  - How do you use Forest Service lands within the project area? These acres are important for the manageable timber base of the Forest and our members utilize them to help support their mills and operations. Currently these acres are not producing up to their capability. More active management will reduce the fuels and provide healthier stands for the future while providing raw materials for our sawmills.
  - Do you have site-specific areas you would like to see treated? AFRC believes it is very important to reduce the fuels loading in and around the Troy WUI specifically both on federal lands and other private lands that may agree to additional management. Again, treat as many acres as possible.
3. AFRC strongly supports the District's plan to apply for an emergency action determination through section 40807 of the Bipartisan Infrastructure Law. For an environmental assessment, this emergency action requires only a proposed action and no action alternative. The proposed action will be designed to treat and reduce fuels within the project area by shifting species composition, size class, and stand densities towards Forest Plan desired conditions. AFRC believes that prompt implementation of this project is critical to the health of the forest and to the safety of the adjacent communities.
  4. AFRC encourages the District to put forth a project that is economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability 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 CE's and contracts (i.e. dry

conditions during wet season, wet conditions during dry season). 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 Kootenai market area with a variety of skills and equipment. Developing a CE 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 Project and 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. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the type of equipment allowed to do the work.

In closing, AFRC urges the District to prioritize implementation of this Project for community wildfire protection, forest health, and to provide raw materials for our sawmills.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and is positioned below the word "Sincerely,".

Tom Partin  
AFRC Consultant  
921 SW Cheltenham Street  
Portland, Oregon 97239