



August 15, 2023

Sam Martin
District Ranger
3 Rivers Ranger District
12858 US Hwy 2
Troy, MT 59935-8750

Re: Trojan Defense Vegetation and Fuels Management Project

Dear Sam,

The Kootenai Forest Stakeholders Collaborative (KFSC) is in receipt of the maps and pre-scoping notice for the Trojan Defense Vegetation and Fuels Mgt. Project dated 7/20/23. We offer the following comments as they pertain to the proposed action.

We appreciate that the agency is proposing management activities in fire-sheds adjacent to the West and Southwest of Troy Montana. These lands are intermingled with private timberlands, industrial timberlands, residential homes and businesses outside of Troy city limits. We appreciate that the agency realizes the necessity of vegetative treatment on it's lands to mitigate fire potential. We also appreciate the agency's realization of the necessity to include those adjacent intermingled lands in an inter-jurisdictional cross boundary. This will achieve mitigation of fire potential with vegetation management on those other lands. We encourage you to consider cooperation with all owners in an effort similar to the recently completed Rabbit Tracks Project. Because of the intense fire risk to the Troy area a united approach to fuel reduction is imperative.

We understand the need for improvement of forest resiliency with-in those stands dominated by Fir species and the need for thinning (both pre-commercial and commercial) of overstocked stands. As fire does not stop at 40 acre intervals, we appreciate the need for landscape level projects that mimic natural disturbances as well as treatments in dry site old growth that enhance and protect the old growth components of those stands. While not able to support the project at this stage, we do support the need to treat and reduce fuels by shifting species composition, size class and stand densities towards forest plan's desired conditions.

We understand that the above objectives will be met with a myriad of differing prescriptions including but not limited to: intermediate harvest, mosaic harvest and regeneration harvest, pre-commercial and commercial thinning, mechanical fuels and activity fuels treatment and disposal and prescribed under-burning. We trust that the agency will undertake all these management decisions with the utmost concern for water quality, wildlife and habitat needs and concerns, noxious weed spread and access for public and recreational concerns.

Concerns specific to this project include improvement of ingress and egress by removing flammable vegetation providing for fire fighter safety along major travel routes in the project area. This not only will help protect fire-fighters but also the public in their evacuation needs should they arise. As we know you are very much aware of, Troy and the adjacent areas are at extreme risk from the strong winds that often blow down canyon in the Callahan Creek drainage.

We'd like to note that KFSC members represent a VERY broad base of individuals concerned with the management direction of the Kootenai National Forest. Our members include local elected officials, representatives of conservation groups as well as timber and lumber manufacturers. Our group also includes former U. S. Forest Service Rangers and Supervisors as well as representatives of various forest recreational user groups and local business owners. The point is our group has a long history of working with present and former KNF staff and our goal is to see the forest succeed with projects that enhance the forest's future while protecting concerns that are in the present. We look forward to working with you and your staff as this project moves forward.

Thank you for the opportunity to comment.

Tim Dougherty, 3 Rivers RD team leader

On behalf of the
Kootenai Forest Stakeholders Collaborative