

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Northwestern Land Office

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GREG GIANFORTE, GOVERNOR

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August 18, 2023

Sam Martin, District Ranger
Three Rivers Ranger District
Kootenai National Forest -GovDelivery
12858 US Highway 2
Troy, MT 59935

Re: Montana Department of Natural Resources and Conservation, Comments on the Trojan Defense Project

Dear Mr. Martin:

Thank you for the opportunity to comment on the proposal for the Trojan Defense Vegetation and Fuels Management Project. The project area is located immediately south and west of the City of Troy. Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests and manages state trust lands near this area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.

The analysis area is a mixed ownership of national forest, private timber lands, residential homes, and businesses outside of the Troy city limits. Dense vegetation and heavy fuels directly upwind of private property makes for extremely high risk of wildfire impacts including potential loss of life and property.

The Kootenai County Commissioners have declared a Countywide Emergency due to the extreme wildfire threat in the county. The area is within the Wildland Urban Interface (WUI) in the 2023 Lincoln County Community Wildfire Protection Plan (CWPP). It's identified in the CWPP as Priorities 1 and 2 for hazardous fuels treatments.

The area is within the Kootenai Complex of the national Wildfire Crisis Strategy, a national priority for addressing wildfire risk. It is within a Priority Area for Focused Attention in the Montana Forest Action Plan due to high risk to severe wildfire impacts. The purpose of the project aligns well with the Montana Forest Action Plan which emphasizes actions across boundaries to reduce wildfire risk and improve forest health, and retention of a forest industry in Montana.

The project area contains dense forest stands that can support difficult-to-control crown fires that could threaten life and private property. There's an urgent need for action to reduce the risk of high intensity wildfire to homes, businesses, and private property in this area.

DNRC supports the potential treatments including non-commercial thinning, mechanical fuels reduction, regeneration harvest, and prescribed burning. The primary objective for treatments should be to reduce the intensity of fire behavior and increase options for safely protecting values at risk. To effectively reduce fire intensity, post-treatment stands should be open enough for fire to drop to the ground and not spread through the crowns. Include as many acres needing treatment as possible. Treatments within this project will connect with past and future treatments on adjacent lands to reduce the wildfire risk in this area.

DNRC supports the project design, its clear purpose of protecting the community of Troy from wildfire, and the request for Emergency Action Determination to expedite the implementation of this critical project.

DNRC looks forward to further discussions about using the Good Neighbor Authority (GNA) to implement the project as quickly as possible. DNRC has programs to assist private landowners in the area with treatments on their lands and suggest as part of this project, regular communication with neighboring landowners be established to provide information and encouragement for them to treat their lands where necessary.

DNRC is committed to continuing a positive working relationship with the Kootenai National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By working together, we can more effectively work towards an "all lands" approach to forest management and restoration, benefiting the missions of both agencies.

Sincerely,

A handwritten signature in blue ink that reads "Greg Poncin". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "Poncin".

Greg Poncin
Area Manager
Northwestern Land Office
MT DNRC

CC: Doug Turman, Unit Manager, Libby Unit, MT DNRC
Stephen Kimball, Local Government Forest Advisor