August 9, 2023

Trojan Defense Project c/o Sam A. Martin District Ranger Three Rivers Ranger District 12858 US Hwy 2 Troy MT 59935

Dear Sam:

Stimson Lumber Company is a privately owned forest products manufacturer and timberland owner with holdings in Idaho, Montana, Oregon, and Washington. Stimson has significant timberland ownership, immediately adjacent to the Trojan Defense Project west of Troy, MT.

I am writing to voice Stimson Lumber Company's 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 communities in NW Montana. This project will serve as an expansion of ongoing cross-boundary efforts to connect past, present, and future activities to reduce and mitigate wildfire threats to the Troy community. Stimson was heavily involved in the Rabbit Tracks Cross Boundary Project implemented over the past several years on the eastern boundary of Troy in the Rabbit-Obrien area. This project involved multiple landowners and originated through a grant from the Montana Forest Action Plan, supported by Governor Gianforte and the Montana Department of Natural Resources and Conservation.

The area around Troy has seen several potentially destructive wildfires in the past few years. Steps need to be taken quickly to reduce fuel in the WUI and to protect the area in and around Troy. The County has recognized the severity of the situation by including Troy in the high priority Kootenai Complex Fireshed and Lincoln County WUI. The project area is entirely within the 2023 Lincoln County Community Wildfire Protection Plan WUI and the Kootenai Complex Fireshed.

- 1. The project notification requested feedback on the following Points. Stimson's input is provided under each bullet point.
  - What would you like to see done to reduce hazardous fuel loading and potential fire severity? Stimson would like to see all available acres within the Trojan Defense Project area treated. This treatment will require commercial harvest due to timber size and stand conditions that are in many cases, overstocked and in various stages of decline. Thinning and regeneration harvests should be used in

areas where severe forest health issues are present and in areas where stand density is beyond the carrying capacity of the site.

- What would you like to see done to improve opportunities for firefighters to safely engage wildfires within the project area? The only feasible way to improve firefighter safety within the project area is to reduce fuel loads across the spectrum. Treating all canopy classes will be necessary to achieve this fuel reduction properly. Stimson also recommends the use of shaded fuel breaks along all ingress and egress routes within the Project area. Shaded fuel breaks were incorporated into the Rabbit Tracks project and our view is that this treatment provides firefighters with solid lines of defense to work from and provides safety routes for local residents in case of large fires.
- What would you like to see done to maintain and/or improve forest health, ecological function, and resource conditions? The Kootenai National Forest needs to aggressively reduce the number of trees per acre that currently occupy this area and across the Forest. Promoting fire-resistant species such as Western larch and Ponderosa pine and keeping ladder fuels and excessive brush out of the understory will provide for greater ecological health in our forests, long-term.
- How do you use Forest Service lands within the project area? As stated earlier. Stimson is an adjacent timberland owner. We share road systems and property boundaries. Our foresters are in the area on a regular basis. This area of the Kootenai National Forest is very productive for timber management and is presently not performing well due to a lack of attention. Our foresters also recreate in this area. Hunting, berry picking, and other forms of recreation are important to our employees as well as knowing that the forests are being cared for properly.
- Do you have site-specific areas you would like to see treated? Stimson would like to see active fuels reduction treatments along its timberland borders. Stimson is happy to cooperate with the Forest by allowing the use of roads for access or removal of timber products. Please contact our forester, Bruce Rowland at (406) 370-5657 to coordinate. Equally important for Stimson is to treat federal lands adjacent to other private property and important infrastructure in the area.
- 2. Stimson strongly supports plans 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. Stimson believes the faster this Project can be implemented, the better it will be for the Forest, Stimson's adjacent timberlands and for the surrounding community.
- 3. Stimson encourages the Three Rivers District to design and implement a model project which treats all stages of forest fuels within the WUI and the Kootenai Complex, in full

alignment with Chief Moore's Wildfire Strategy directives. This project can serve to provide the leadership necessary to move from relative inaction on the Kootenai to proactively addressing overly stocked timber stands that are leading to catastrophic fires that cannot be safely suppressed. Time is not our friend. These timber stands are in desperate need of assistance.

In closing, Stimson asks the Three Rivers Ranger District to move rapidly on this Project for community wildfire protection, forest health, and to provide our timberlands with a fighting chance to grow and produce future crops of timber. We urge you to treat as many acres as possible under this Project.

Sincerely,

Barry N. Dexter

Senior Resource Advisor Stimson Lumber Company

Bury 1. Dester

(208) 818-3470