



October 26, 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 a collaborative group which partners with staff on the Kootenai National Forest (KNF) to achieve success on numerous projects both in and around federal lands on the KNF. We are a diverse group of individuals which continue to work out differences on these projects in an attempt to achieve consensus on the out-comes on these projects. Our members represent conservation groups, local and regional elected officials, recreation groups, timber interests and representatives of the general public. We truly appreciate the opportunity to offer scoping comments on the Trojan Defense Hazardous Fuels Reduction Project.

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 fashion. Lastly, we appreciate that the agency realizes the success of the recently completed Rabbit Tracks Project in fuels management. 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. We realize 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. We also realize the need for both commercial and non-commercial treatments as different stands warrant different treatments. We support the need to treat and reduce fuels by shifting species composition, size class and stand densities towards the KNF 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, improvement & 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 as well as 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. Troy and the adjacent areas are at extreme risk from the strong winds that often blow down canyon in the Callahan Creek drainage. Also of concern will be the construction and establishment of 6 new miles of roads in the project area. We understand these roads will assist the agency in future fire suppression efforts and management activities as necessary, especially in the McConnel Mountain area.

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, members of conservation groups, timber and lumber manufacturers, former U.S. Forest Service line officers, various recreational user groups and local business owners. 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. As such, we support the Trojan Defense Hazardous Fuels Reduction Project and appreciate the opportunity to submit scoping comments.



Tim Dougherty
3 - Rivers Ranger District Team Leader
Kootenai Forest Stakeholders Collaborative