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First name: Greg
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Organization:
Title:
Comments: October 26, 2023

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

Dear Mr. Martin:

Thank you for the opportunity to comment on the proposed action 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 wildfire 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. Lack of recent fire resulted in a species composition shift and increased stand densities which has led to stressed trees and unhealthy stand conditions, also causing increased surface, ladder, and crown fuels. DNRC strongly supports the proposed treatments to reduce the wildfire risk in this area.

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.

DNRC supports the purpose of the project which is to reduce hazardous fuels in the project area. Treatments with this project will connect with treatments on other projects on national forest lands as well as work on other ownerships to modify fire behavior and increase firefighters' chances of reducing impacts to the community of Troy and surrounding area. 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.

DNRC supports the proposed action which includes 798 acres of non-harvest fuels reduction and 935 acres of harvest (intermediate and regeneration treatments). The outcome of the treatments will be reduced ladder fuels and tree densities near private property. This will facilitate fire remaining near the ground and not spreading through the trees as a crown fire. This will create areas that are advantageous and safe for firefighters to take a stand against a progressing wildfire. An added benefit is increased spacing between trees to maintain or improve forest health, tree growth, and desired species composition. Planned under burning and pile burning following vegetation treatments will result in significant reduction of the fuels hazard in the project area.

We urge you to consider adding shaded fuel breaks along key roads on national forest system lands. These can reduce fire intensity if residents need to evacuate and provide areas where fire drops to the ground for safer and more effective suppression. Fuel breaks along roads can be used as anchor areas for burning-out to provide lines of defense near communities. It appears there may be potential for shaded fuel breaks along Roads 4475, 4476, 4478, 427, and other roads.

Regarding the effects on carbon and climate change: the widespread loss of forest cover through severe wildfires is the greatest threat to loss of carbon stored and sequestered in western forests. High severity burns result in long term loss of forest cover and associated plant and animal communities dependent on forest ecosystems. The best strategy for adapting landscapes is to actively manage forest vegetation for reduced tree density and diverse structure and composition. This will prevent large scale loss of forest cover and facilitate continued carbon sequestration and storage. Therefore, this project will contribute to carbon retention on the Kootenai National Forest.

DNRC supports the use of Healthy Forest Restoration Act authorities: Wildfire Resilience CE or HFRA EA due to the high risk of wildfire impacts close to a Community at Risk (Troy). DNRC supports the request for Emergency Action Determination to expedite the implementation of this critical project.

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,

Greg Poncin

Area Manager, Northwestern Land Office