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First name: Jennifer

Last name: Nelson

Organization: Lincoln County, Montana

Title: County Forester

Comments: October 30, 2023

Thank you for the opportunity to comment on the Three River's Trojan Defense Vegetation and Fuel Management Project. The Lincoln County Commissioners fully support the project. Also, thank you for the opportunity to be involved with the pre-scoping of the project and the opportunity to sit down at the table to discuss cross-boundary treatment opportunities this past summer. Collaboration of this type is so important to identifying opportunities on ownerships other than federal lands that can further reduce fuels and protect our communities from wildfire risk. Multiple analyses have identified the high risk for wildfire posed to the communities in Lincoln County and around the country. The Montana Forest Action Plan (2020) and the Montana Wildfire Risk Assessment (2020), as well as Headwaters Economics, Congressional Research Services and others have all come to the same conclusions, we are at a critical stage for wildfire risk and in protecting our communities from wildfire. The Kootenai Complex Wildfire Crisis Strategy Landscape designation by Secretary of Agriculture Vilsack and the passing of Resolution 2022-19 "Countywide Emergency Declaration Forest Health and Wild Land Fire Threat" by the Lincoln County Commissioners are indications of the concerns that our leaders, from the national level to the local level, have regarding this threat to our communities. The recently updated Lincoln County Community Wildfire Protection Plan (CWPP, 2023) identified areas immediately adjacent to the City of Troy as the top two priority areas for treatment in the Bull Geographic Area. The CWPP discusses the wildfire potential in the Callahan drainage. The steep terrain, prevailing winds from the southwest and high levels of disease and mortality in the area present a clear danger to the Troy community and its residents. The Trojan Defense Project addresses fuel reduction treatments on federal lands in those priority areas. The district's earlier outreach to adjacent landowners and Lincoln County has resulted in their engagement and additional opportunities to expand fuel reduction and reduce wildfire risk to Troy residents. Specifically, we support the proposed fuel treatments, including non-harvest and harvest, to reduce fuels and stand densities, and to promote forest health. We also support treatment in old growth to protect existing old growth and nurture replacement old growth. We support the creation of units over 40 acres in size where recommended, to promote healthier forests, create browsing habitat for wildlife and provide material for local mills. We also support the proposed road package. Thank you for incorporating the Primary Lines of Defense (PLODS) into the mapping layers of the project map as we requested. We reiterate our earlier comments asking for maintenance of the PLODS where they occur on Forest Service lands and also the creation of fuel breaks along those roads, specifically Forest Roads 4476 and 427. This is a critical project for Lincoln County. We deeply appreciate the Three Rivers District's quick action in addressing the wildfire threat to the City of Troy and developing a worthy project in such a short timeframe. If there is anything that the County can do to facilitate the Trojan Defense Project, please let us know. Sincerely, Brent Teske, Jim Hammons, Josh Letcher, Commissioners