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Comments: DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Northwestern Land Office

GREG GIANFORTE, GOVERNOR

STATE OF MONTANA

April 5, 2024

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

Dear Mr. Martin:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the Trojan Defense Hazardous Fuels Reduction Project. The project area is immediately south and west of the City of Troy, a designated Community at Risk with the Healthy Forest Restoration Act (HFRA). 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. DNRC has worked collaboratively with the Forest Service in the early design and outreach for this project.

The project 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.

The Lincoln County Commissioners have declared a Countywide Emergency due to the extreme wildfire threat in the county. The area is entirely 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 and improve forest health and resilience. 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 808 acres of non-commercial fuels reduction and 935 acres of commercial harvest, including intermediate and regeneration treatments. The treatments will result in reduced ladder fuels and tree densities on national forest lands and connect with treatments on private lands. 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.

The Environmental Assessment provides detailed discussion of the effects of the proposed action and no-action alternatives. We appreciate the detailed explanation of how the treatments will meet the purpose and need and desired conditions. The analysis clearly states the case for choosing the proposed action alternative to reduce the exceptionally high risk of severe wildfire impacts to the community.

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 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. 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