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First name: Jennifer

Last name: Nelson

Organization: Lincoln County

Title: County Forester

Comments: April 11, 2024

Dear Ranger Martin,

Thank you for the opportunity to comment on the Three River's Trojan Defense Vegetation and Fuel Management Project Environmental Assessment(EA) and Finds of No Significant Impacts (FONSI). As you are aware Lincoln County Commissioners fully support this important project from our pre-scoping comments in August of 2023 and scoping comments in October of 2023.

Again, thank you for the opportunity to be involved with the pre-scoping process and for the opportunity to sit down with district staff to discuss cross-boundary treatment opportunities this past summer, We so much appreciate being able to collaborate on projects that are planned in the Wild land Urban Interface {{WUI}}, especially those so near our communities.

You have produced a professional and thorough analysis in the matter of a few months and your staff should be congratulated. The minor reduction in harvest acres indicates to us that the initial fieldwork was done with a clear understanding of the purpose and need for the project, which is critical to the timeline and success of a project. It also indicates that the ID team members and staff are working together with strong leadership. And finally, it shows the value and importance of using the tools that are appropriate for the project, in this case the emergency action determination provided under section 40807 of the Bipartisan Infrastructure Law. By all indications we are at a critical stage of wildfire risk, so the speed with which you have completed this EA and FONSI is appreciated and encouraging,

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 will address nearly 80% of the federal lands within the project area. The vast majority of which is within or immediately adjacent to priority areas 1 and 2 as identified in the Lincoln County Community Wildfire Protection Plan (CWPP). These are the types of projects that are critical to the safety and health of our residents. We also believe that they are essential to the health and diversity of our forests.

The section on carbon storage reads very well and does a good job of explaining a complex system and the need for old and new forests in words that people can understand, as does the section on page 71 that addresses the effects to carbon. Perhaps in the future the amount of carbon release from a no action alternative and the action alternative could be estimated to add further to the deleterious effects of no action alternatives when discussing wildfire risk and fuels.

We support the proposed fuel treatments, including non-harvest and harvest and support treatment in old growth to protect existing old growth and 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 treatments in units 25, 26, 19, 15, F8, F9, U2, 12, 11, 8, 6, P3, F5, 5, 4, PI, 3, and F4, which lie along the Lincoln County Primary Lines of Defense (PLODs), to improve wildfire suppression tactics and ingress, egress, and safety zones where possible, as we requested in our prescoping and scoping comments. These treatments will go a long way in improving safety for firefighters and the public while also accomplishing goals identified in the CWPP.

The Trojan Defense Project is a critical project for Lincoln County, but especially for the residents in and around Troy. Again, we deeply appreciate the Three Rivers District's efforts in quickly developing and analyzing an important community protection project.

Gratefully,

Brent Teske, Jim Hammons, Josh Letcher

Lincoln County Commissioners