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Comments: I have heard about this happening in the USFS several times: IDT resource specialists are unable to think independently outside the USFS timber agenda box. It's sad. These people skip home after work believing they served the public by making it possible for the agency to implement treatment the public wants. Of course this is so untrue it's laughable. Since the IDT members won't think about things that the agency clearly does wrong, they parrot agency propaganda that will soften the public to logging and road construction treatments.

Your 25 page September 2023 Trojan Defense Hazardous Fuels Reduction Project Scoping Document does not contain the word "Cohen" in the text or the References. This was not an oversight. You don't want the public to find out about his highly effective fine fuels removal methods. It's too bad the general public does not know fuels removal has been the USFS's primary excuse to commercially log and road-up a healthy, properly functioning forest for over 10 years. Supervisor Benson do you start fires in your fireplace using kindling?

Public comments listed in the 2023 Trojan Defense Hazardous Fuels Reduction Project document at pages 3-10 show the public is 1) concerned about their houses burning, 2) concerned that the USFS's Proposed Action to deal with the risk isn't the most effective way to address the issue, and 3) concerned about the impacts to the natural resources in and downstream from the project area that a hazardous fuels removal commercial timber sale will likely cause.

At page 11 the September 2023 Trojan Defense Hazardous Fuels Reduction Project Scoping Document says the primary need for this timber sale is to "Reduce Hazardous Fuels in the Project Area." This is crazy. Most people living in the WUI want the USFS to do whatever will reduce the risk their homes will burn if a wildfire burns into the WUI. This would include removing hazardous fuels but there is another treatment not mentioned in the September 29, 2023 Dear Interested Party letter. Even a child could understand the problem here.

The Purpose & Need should have been "take action to reduce the risk that homes in the WIU will burn if a wildfire threatens it" rather than remove hazardous fuels. I find it difficult to understand why an IDT without major Responsible Official oversight and frequent direction dictating what to write would not figure this out. The public does not care about hazardous fuels. They don't want their homes to burn!

Dr. Jack Cohen has a Ph.D. in fire physics and worked for the USFS while he was doing his research. His treatments were unlike any other. Literature describing Dr. Jack Cohen's research conclusions has been available for nearly 30 years. USFS line-officers depend on their fire staff to know this.

His research resulted in him publishing his fine fuels removal treatment methods which reduce the risk of fire damage should a wildfire occur. His methods are used worldwide. Of course Linda Ferguson and Jason Withrow know about his methods and their effectiveness but they refuse to discuss them in the October 26, 2023 Dear Interested Party letter.

Dr. Cohen's methods remove fine fuels ... not merchantable logs that aren't a fire hazard anyway. Removing merchantable logs that the USFS claims are hazardous fuels has been the primary agency excuse to log and road-up healthy forest stands for many years?

The chance homes in the WUI will be damaged should a wildfire occur is real but the IDT author's of the scoping documents do not propose treatments that will really satisfy the P&N. The scoping documents ignore the most effective treatment proven to save homes in the WUI that is used worldwide today. Why do they ignore it??

Linda Ferguson and Jason Withrow are fire people who know about Dr. Cohen's fine fuels removal methods but they remain silent so as not to jeopardize Ranger Cook-Fisher's volume generation opportunities. They know Dr. Cohen's fine fuels removal methods do not produce merchantable logs.

This is sad.

By not applying this effective fire damage reduction process Ranger Cook-Fisher increases the risk that buildings on the WUI will burn. People might die. The citizens who live in the WUI must learn about the Kootenai NF mismanagement. I shake my head when I think of a USFS line-officer who believes volume is more important than another person's life and home.

Unless I receive an electronic copy of the modified scoping package that discusses Dr. Cohen's methods it will be necessary to write a LTE to the Daily Inter Lake and the Missoulian.

I am including a few excerpts from Dr. Cohen's papers below so the rest of the IDT knows what they are involved in a scam to generate volume which will allow homes to burn. Especially important text is highlighted in red.

from Structure Ignition Assessment Model (SIAM)<sup>1</sup>

By Dr. Jack Cohen

Presented at the Biswell Symposium: Fire Issues and Solutions in Urban Interface and Wildland Ecosystems, 1994

<https://www.fs.fed.us/psw/publications/documents/gtr-158/gtr-158-cover.pdf>

Excerpts:

"These results suggest that to reduce ignitions, the distances from a structure for managing vegetation are much smaller than the lofting distances for firebrands. Thus, beyond some relatively short distance from the structure (depending on the vegetation and topography), vegetation management has no significant benefit for reducing flame generated ignitions. Vegetation management, on the other hand, cannot be extensive enough, in a practical sense, to significantly reduce firebrand ignitions. Therefore, the structure and its immediate surroundings should be the focus for activities intended for improving ignition risk." (pg 92)

from Community destruction during extreme wildfires is a home ignition problem

By Dr. Jack Cohen and Dave Strohmaier

Published online by The Missoulian, August 9, 2020 and republished by Reddit

[https://www.reddit.com/r/chaparral/comments/i6p1qq/community\\_destruction\\_during\\_extreme\\_wildfires\\_is/](https://www.reddit.com/r/chaparral/comments/i6p1qq/community_destruction_during_extreme_wildfires_is/)

Excerpts:

"To make this shift, land managers, elected officials, and members of the public must question some of our most deeply ingrained assumptions regarding fire. For the sake of fiscal responsibility, scientific integrity, and effective outcomes, it's high time we abandon the tired and disingenuous policies of our century-old all-out war on wildfire and fuel treatments conducted under the guise of protecting communities. Instead, let's focus on mitigating WUI fire risk where ignitions are determined - within the home ignition zone."

from Reducing the Wildland Fire Threat to Homes: Where and How Much?

By Dr. Jack Cohen

Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.

USDA Forest Service Gen.Tech.Rep. PSW-GTR-173

[http://www.fs.fed.us/rm/pubs\\_other/rmrs\\_1999\\_cohen\\_j001.pdf](http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf)

Excerpts:

"As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses." (Pg. 193)

"Extensive wildland vegetation management does not effectively change home ignitability." (Pg. 193)

"Home ignitability also dictates that effective mitigating actions focus on the home and its immediate surroundings rather than on extensive wildland fuel management." (Pg. 193)

from Built to Burn

By Dr. Jack Cohen

Presented at a fire conference in front of people from the Forest Service and state fire agencies, 1999

<https://99percentinvisible.org/episode/built-to-burn/>

Excerpts:

"Cohen thought he had come up with a way to save houses and to let fires burn naturally - he thought it was a win-win. And so in 1999, he presented a paper about his findings at a fire conference in front of people from the Forest Service and state fire agencies. These were people who were in a position to change policies. But Cohen says they were totally uninterested. Cohen's research implied that basically everything about how the Forest Service dealt with wildfires was wrong.

The 10 AM rule had left us with a huge fire fighting infrastructure, so the Forest Service was spending hundreds of millions of dollars on planes and fire crews, and was approving massive logging projects on the grounds that thinning out the forest would help reduce the intensity of wildfires and save homes. Cohen was saying: actually, it would be way more effective if you just encouraged homeowners to maintain and retrofit their properties."

Some Rangers and Supervisors on other national forests do everything they can to protect people living on the WUI.

Here's what they do:

\*offer to remove fine fuels near homes in the WUI owned by handicapped and/or elderly residents using USFS employees with written permission from the landowner.

\*distribute handouts to WUI residents describing Dr. Cohen's fine fuels removal methods so they can do the work themselves.

\*contact the people living in the WUI and announce fine fuels removal workshops will be held to answer questions. These workshops will present Dr. Cohen's research conclusions that prove commercial hazardous fuels logging farther than 100 yards from the WUI is ineffective.

Indeed, there is a reason people use fine fuels (i.e. kindling) to start a fire in the fireplace. Can you understand this? If so, you will know why commercially logging the merchantable timber you claim are hazardous fuels is an underhanded way to deceive the public to believe things that are not true. Shouldn't you treat the people who provide the tax dollars for your salary with a little respect?

You say you will CE this project and plan to apply for an authorized emergency action determination. We both know you are doing this to eliminate objections.

Please understand after my LTE gets published many people will want to object. They will take whatever legal routes they can to see you in court ... CE or not.