



September 12, 2025

Lolo National Forest
Attn. Crystal Stonesifer, Missoula District Ranger
Missoula Ranger District
24 Fort Missoula Road
Missoula, Montana 59804

Re: Tyler's Kitchen Fuels Reduction and Forest Health Draft Environmental Assessment

Dear Missoula District Ranger Stonesifer,

Montana Forest Consultants (MFC) submits the following comments regarding the Draft Environmental Assessment released for the Tyler's Kitchen Fuels Reduction and Forest Health project, which proposes utilizing a variety of forest management mechanisms to treat a 33,440-acre area east of the Rock Creek drainage to reduce hazardous fuel loading within the wildland urban interface and improve forest health.

MFC is the largest and most comprehensive forest consulting company in Montana, spanning a footprint of over 100,000 acres and serving over 200 landowners and agencies since 2016. MFC is a team of foresters, biologists, and ecologists that provide expertise and technical services to landowners and agencies, offering a holistic approach to forest and rangeland management. MFC takes great pride in providing solutions for complex projects that improve landscapes and meet landowner goals and objectives. As a Missoula, Montana-based company we have particular interest in forest management happening on the Lolo National Forest, especially when work on the Lolo happens within close proximity of MFC client landowners. This is the case with the Tyler's Kitchen project.

MFC began providing services to Rock Creek area landowners in 2018. Several of our current clients own private lands within one mile of the Tyler's Kitchen project. Through these projects and local forest collaborative participation, MFC has developed a high level of working knowledge about the forests, ecology, sensitivities, and needs of the project area. The landowners who are utilizing our services in the project area are primarily concerned about hazardous fuels reduction, forest resiliency, forest ecosystem services that support the renowned Blue-Ribbon



Rock Creek fishery, reducing property and structure wildfire risk, and safeguarding both public and private lands recreation opportunities.

The Lolo National Forest's Tyler's Kitchen Project creates opportunities for landowners in this project area to pursue Montana DNRC hazardous fuels reduction grant funds. For many private landowners, access to grant funding is the only way for them to afford the forest treatments to create private land wildfire resilient forest conditions. MFC will be looking to align private lands treatments with proposed Tyler's Kitchen Project public lands treatments wherever feasible. If there are opportunities for use of shared road use agreements for access, Wyden Agreements, or use of any other authorities that would coordinate private landowner forest management with the objectives of this project MFC is interested in facilitating coordination between the Tyler's Kitchen project team and landowners adjacent to the project area.

The Tyler's Kitchen Project is designed to reduce hazardous fuels present on public lands. This is important because private lands forest treatments for wildfire resiliency conducted in this area are not likely to adequately protect infrastructure and values if a high severity wildfire started on and spread from Lolo National Forest lands. MFC is actively treating Rock Creek private forest lands, and the Tyler's Kitchen Project will address the public lands piece of the puzzle. Landscape scale resiliency requires both pieces to be addressed. As such, MFC would like to see the Tyler's Kitchen project implemented to increase the Rock Creek drainage's wildfire resiliency. We are supportive of the use of an Infrastructure Investment and Jobs Act Authorized Emergency Action to move this project forward efficiently.

Economic margins on timber projects in our region are extremely narrow, and we encourage the Lolo to structure this project in a way that emphasizes potential for utilization of as much harvested material as possible, including small diameter class trees. The Environmental Assessment indicates that 'for the proposed action, the appraised stumpage rate is less than the base rates, indicating that it is infeasible (unlikely to sell).'¹ and that this project needs additional funding to move forward. It is critical to take a hard look at whether this project will attract viable bids from local operators, especially given the lack of currently available markets for ponderosa pine. If not, are there changes that can be made that would increase viability or should another project be prioritized elsewhere on the Missoula Ranger District at this time?

¹ Draft Environmental Assessment, pg. 57.



We have taken note that a high percentage of the proposed treatment areas (>50%) have been identified as requiring skyline operations. MFC encourages reducing the use of firm operational equipment requirements for treatment units and to instead use an approach that focuses on descriptive end results, allowing operators flexibility to use the best-suited equipment based on their operating expertise. Rather than prescribing what equipment types must be used, soil condition parameters and objectives could be provided. This will allow operators to evaluate how best to achieve the objectives and reduce limitations that might be caused by requiring operators to use very specific equipment. Having this flexibility will allow a broader range of contractors to consider bidding and will likely increase the economic viability of this project.

MFC also encourages full exploration of opportunities to structure this project as an IRSC or IRTC, as well as evaluation of whether the Good Neighbor Authority could be utilized.

The volume and extent of prescribed fire proposed in this project (7,812 acres) is something MFC is particularly supportive of. If any authorities allow for sharing of resources to allow private lands prescribed fire to be conducted simultaneously in adjacent or nearby properties we encourage those authorities to be exercised.

MFC encourages consideration of use of designation by prescription, particularly given Forest Service staffing challenges, recreation demand in the project area, and the proximity of the project treatment units to private property. Designation by prescription will increase project efficiency during the pre-sale and sale prep phases.

Please note that there are several erroneous references to wavy moonwort and Howell's gumweed in the whitebark pine section of the botany review in the draft environmental assessment (Section 3.3-3, pages 22-23) that should be corrected.

Thank you for the opportunity to provide draft environmental assessment comments for the Tyler's Kitchen Fuels Reduction and Forest Health Project.

Sincerely,

Zachary Bashoor

Zachary Bashoor (Sep 12, 2025 13:53:59 MDT)

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