

September 11, 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,

The Lolo Restoration Committee (LRC) submits the following comments regarding the Draft Environmental Assessment released for the Tyler's Kitchen Fuels Reduction and Forest Health Project, which proposes treating a 33,440-acre area east of the Rock Creek drainage. The stated project objectives are to reduce hazardous fuel loading within the wildland urban interface and improve forest health.

Since 2007, the LRC, a volunteer forest collaborative, has been invested in supporting sustainable forest management of the areas within and surrounding the Lolo National Forest. Our membership includes a wide range of community representation, including neighborhood association leadership, non-profit organization staff, forest resources industry and fire professionals, retired Forest Service and University of Montana College of Forestry staff, and concerned citizens. These comments reflect our group's review of the Tyler's Kitchen draft environmental assessment.

The Tyler's Kitchen project is designed to modify forest conditions to improve opportunities to enable healthy forest structure and function. As such, the proposed treatments should emphasize achieving forest conditions that will allow for two things in the case of wildfire: 1) creation of opportunities for effective wildfire management response, and 2) forest structures that reduce risk of stand-replacing fire or conversion of forest to grasslands, i.e. modifications to forest conditions to mimic historical conditions for fire-adapted forests that burned at frequent intervals supporting low- and mixed-severity fire. Recent research, including a 2024 meta-analysis led by Kimberley Davis at the USFS Rocky Mountain Research Station¹, indicates that combined treatments of thinning and prescribed fire are the most effective at positively reducing severity of subsequent wildfire, and the volume of prescribed fire proposed in the Tyler's Kitchen project (7,812 acres) is something LRC is particularly supportive of. It is critical that as funding be sought for this project that prescribed fire treatments are retained and achieved, even though the estimated prescribed fire costs (over \$1.7 million for broadcast burning, plus \$300,000 in pile burning) far exceeds the estimated cost to execute all other proposed project forest management treatments (approximately \$1 million).

LRC is supportive of the modifications that have been made to the project since the 2024 Scoping Period to reduce construction of permanent roads, reduce soil disturbance, and ensure that treatments proposed will meet desired stand conditions. If additional modifications are made, LRC encourages the project planning team to take into account the following:

Project implementation will only be successful if the forest management bid packages offered are economically feasible and will attract willing bidders from our local forest resources industry. This is especially challenging given the limited markets for ponderosa pine and small diameter trees presently, and we have noted that the EA indicates that larch and ponderosa pine will be retained wherever possible. There is no indication in the EA of whether the Good Neighbor Authority will be utilized for this project, and we encourage full consideration of that authority to improve likelihood of efficient and timely project implementation. If treatment areas are reduced or revised to improve economic feasibility, LRC encourages evaluating whether planned treatments in the IRA portion

¹ <https://www.sciencedirect.com/science/article/pii/S037811272400197X>

of the project could be reduced first and priority given to retaining treatments planned in the highest risk WUI areas, i.e. areas closest to infrastructure and recreation values in the immediate Rock Creek corridor on the western side of the project area. Treatment of areas surrounding Bonneville Power Authority infrastructure should not be prioritized over these other values.

It is notable that the Tyler's Kitchen projects includes proposed treatments in the 12,775-acre Silver King Inventoried Roadless Area. Proposed treatments include over 200 acres of timber harvest (commercial and non-commercial) and nearly 2,000 acres of prescribed fire. The project will also decommission 3.8 miles of system roads in this IRA. LRC is supportive of these road closures and is also supportive of economically feasible forest management treatments in this IRA if they are designed and implemented to reduce wildfire risk and retain forest cover. The Silver King IRA has a history of timber management dating back to the 1980s and this project provides a timely example, given the Trump administration's interest in repealing the Roadless Rule, of the rule's existing allowances for forest management treatments that reduce the risk of uncharacteristic wildfire effects. This project demonstrates that it is not necessary to repeal the Roadless Rule to allow for wildfire risk reduction forest management to happen in Inventoried Roadless Areas.

During this time of limited and declining resources, LRC believes it is critical to focus the Lolo National Forest's resources and efforts in WUI areas. This is why the LRC has been highly involved in the WAM Blue Mountain Project. Similarly, LRC finds that the Tyler's Kitchen project is WUI-focused and will protect critical recreation, wildlife, and private lands infrastructure in the Rock Creek watershed. We are supportive of the project moving forward as proposed in the draft environmental assessment and appreciate the planning team's willingness to take into account the suggestions we have provided here.

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

Sincerely,
Erin Clark and Jim Burchfield, Lolo Restoration Committee co-chairs
lolo restorationcomm@gmail.com