



February 1, 2024

Chris French  
Deputy Chief  
National Forest System  
USDA Forest Service

*Submitted via Federal eRulemaking Portal [www.regulations.gov](http://www.regulations.gov)*

Re: Notice of Intent to Prepare an Environmental Impact Statement

Dear Mr. French:

The Ruby Valley Strategic Alliance (RVSA) appreciates the opportunity to comment on the Notice of Intent (NOI) to prepare an Environmental Impact Statement regarding the effects of amending land management plans to address our old growth forests. (88 Fed. Reg. 88042, December 20, 2023). We recognize that old growth forests are a unique asset to our public lands that contribute to a healthy, resilient forest ecosystem, particularly when managed appropriately, and addressed alongside the intersection of wildfire.

The Ruby Valley Strategic Alliance is a diverse alliance of individuals and organizations that find common ground through shared conservation values for the greater Ruby landscape in Southwest Montana. In our landscape, working ranches and public lands are inextricably tied; we believe management decisions about both are strengthened through lasting partnerships. We value maintaining and enhancing our working lands, outdoor way of life, wilderness heritage, quiet country, and high-quality recreation experiences. The RVSA works collaboratively on a foundation of trust to respond to threats to our values, advocate for the places and way of life we cherish and promote positive stewardship of the Ruby Valley.

First off, we appreciate all the ways in which this NOI and proposed action consider the concerns we raised during the Advanced Notice of Proposed Rulemaking comment period, including recognizing that old growth action must be geographically informed, acknowledging that science-based treatment is a necessary tool for protecting the health of old growth, and creating space for the Forest Service to engage with local collaboratives in this effort. RVSA also appreciates that this amendment process could help expedite the implementation of the Wildfire Crisis Strategy by providing clear guidance to Forest Service staff, so they feel confident taking the proper action if old growth is identified within areas that need treatment to prevent wildfires and protect human health and safety. However, this will be dependent upon proper execution and interpretation of this action, so our comments will focus on ways that this proposed action could be improved, as well as highlight several remaining questions that the RVSA has.

Forest conditions and management needs vary forest-to-forest, place-to-place. We appreciate the Forest Service's efforts to create a cohesive strategy to improve the health of old-growth forests while also

ensuring flexibility for local forest staff to undertake management actions that are appropriate at the site-level to accomplish this goal. To this end, it is important that the Forest Service seek and incorporate input from local community stakeholders and Forest Service staff into the process to make sure this national amendment is written in a way that can address local forest conditions and needs. To ensure this happens, we suggest the Forest Service set up regional strike teams that could support and assist local forest staff in collecting and providing input into the development of the amendment and step-down adaptive management strategies. This would help free up local capacity by not requiring on the ground staff to undertake this effort on their own and pull focus away from local projects, while also ensuring that local forest staff and community partners have a high-level of input into this national process. This is important to the RVSA because there is a large amount of project work to be done in our adjacent Beaverhead-Deerlodge National Forest, and we want to ensure that our local staffers have the capacity to focus on locally driven projects, while also ensuring that their input is prioritized as the amendment is implemented.

We would also like to see a highly effective process implemented for reviewing, amending as needed, and approving the projects that are currently in process, given that they may now require additional approval by the National Forest System Deputy Chief. This will help mitigate any major timing impacts to projects being approved and implemented and will help local Forest Service staffers to continue with the important implementation of the Wildfire Crisis Strategy.

Remaining questions that the RVSA has regarding this NOI and proposed action are below.

- Can you please provide clarity on how this will impact approved vegetation treatment and forest health restoration projects that already have contracts?
- Can you please provide clarity on how this will impact vegetation treatment and forest health restoration projects that are currently undergoing the NEPA process?
- What is your plan for public engagement as part of the draft Environmental Impact Statement?
- As you undertake the development of the Environmental Impact Statement, how will you validate the vegetation layers you are using to ensure the inputs going in are accurate?
- Will you be using the existing old growth definitions that each Region currently has?

The members of the Ruby Valley Strategic Alliance appreciate the direction this proposed action and NOI has taken, given that it acknowledges the need for treatment in certain places, allows for geographically informed management, and creates space for local input to be incorporated. We appreciate the opportunity to comment on this Notice of Intent and look forward to seeing how this amendment process can strengthen and streamline the implementation of the Wildfire Crisis Strategy.

Thank you for considering our comments.

Sincerely,

John Anderson, Ruby Dell Ranch  
Neil Barnosky, Ledford Creek Grazing Association & Silver Spring Ranch  
Les Gilman, Gilman IH Cattle Company  
Gary Giem, Warm Springs Grazing Association & Giem Angus Ranch

John Helle, Helle Livestock

Rick Sandru, Ruby Valley Stock Association & Sandru Ranch

Cortney Bue, Ruby Conservation District

George Trischman, Former Chairman, Montana Public Lands Council

Chad Klinkenborg, Montana Land Reliance

Chris Edgington, MT Trout Unlimited

Dan Allhands, Madison County Commissioner

Dan Durham, Ruby Habitat Foundation

Emily Cleveland, Wild Montana

Jim Berkey, The Nature Conservancy

Kathryn Eklund, The Wilderness Society

Sally Schrank, The Greater Yellowstone Coalition