



May 3, 2024

Dale Olson
Madison Ranger District
5 Forest Service Road
Ennis, Montana 59729

Re: South Tobacco Roots Project Draft Environmental Assessment

Dear Mr. Olson:

The Ruby Valley Strategic Alliance (RVSA) appreciates the opportunity to comment on the South Tobacco Roots Project Draft Environmental Assessment. The South Tobacco Root Vegetation project will enhance forest health, reduce wildfire risk, improve fish habitat, decrease erosion, secure Grizzly bear habitat, and create jobs.

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.

We appreciate the science-based approach to developing the South Tobacco Roots vegetation project, the focus on forest health through fire and timber management and the identification of stream restoration projects to include. This letter includes our comments and questions on the project.

Reduce Wildfire Risk

RVSA is supportive of reducing wildfire risk in the South Tobacco Root mountains, and we appreciate that broadcast burning will be the primary tool to remove conifer encroachment, with timber harvest also being used. We suggest that during this process, USFS staff encourage the neighboring private landowners to do their part to create fire barriers and think about how to decrease wildfire risk on their private property.

Transportation Management

We understand the need to improve open roads in the Southern Tobacco Roots and understand the maintenance and new construction of 36.7 miles of NF roads is designed to improve safety and decrease sedimentation into streams. We are supportive of all actions that protect the waterways in the project.

We are supportive of blocking, stabilizing, and decommissioning or obliterating the 18.78 miles of non-system roads if legitimate management or recreational use is not established. We request a focus on weed management be maintained well into the future for these disturbed areas.

The draft EA (Environmental Assessment) mentions: “For all other non-system roads, closure method would be determined on a case-by-case basis and based on current conditions and available resources. These methods are described below and include blocking and signing roads, stabilization, decommissioning, and obliteration. Native seed may be applied to any road prism closed using these methods. Collectively, the analysis refers to closure methods as non-system road decommissioning.” We request decommissioning or obliterating roads as opposed to blocking or stabilizing these roads in the designated Roadless Area to increase secure habitat for grizzly bears and other wildlife species.

We are supportive of obliterating 4.0 miles of system roads for resource protection. Overall decreasing and improving the road system will decrease weed spread, decrease erosion into streams, and improve secure habitat for grizzly bears.

Fish Habitat Improvement:

We are supportive of stream habitat work on Harris Creek and Kings Gulch, including but not limited to the creation of complex instream habitat with onsite rock and woody material by hand, reduction of livestock impacts by strategically felling trees, and sediment reduction by completing road maintenance and obliteration of three stream crossings to benefit water quality.

The members of the Ruby Valley Strategic Alliance appreciate the direction of this proposed project action to mitigate fire risk and improve forest health in the South Tobacco Roots. We appreciate the opportunity to comment on this draft EA.

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

Donna McDonald, Upper Canyon Outfitters