



April 17, 2026

Josh Connors
Madison Ranger District
5 Forest Service Road
Ennis, Montana 59729

Re: South Tobacco Roots Project Draft Environmental Assessment

Dear Mr. Connors:

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 support forest health, reduce wildfire risk, improve fish habitat, and decrease erosion.

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 supports 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 used. We encourage the USFS to identify and implement cross-boundary projects that address conifer reduction and fuels management concerns on neighboring land and increase the extent and effectiveness of efforts on the Forest.

Transportation Management

We understand the need to improve open roads in the Southern Tobacco Roots and understand the new construction of 14 miles of NF roads is designed to improve safety and decrease sedimentation into streams. We support all actions that protect the waterways in the project. We are supportive of blocking, stabilizing and decommissioning or obliterating the 18.8 miles of non-system roads. We request that a focus on weed management be maintained well into the future for these disturbed areas.

The draft EA mentions: "For all other non-system roads, closure methods would be determined on a case-by-case basis and based on current conditions and available resources. These methods are described below: 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 obliteration of roads, rather than blocking or stabilizing them, within the designated Roadless Area to increase the security of habitat for Grizzly bears and other wildlife species.

We support the obliteration of 4.6 miles of system roads for resource protection. Overall improving the road system will reduce weed spread, reduce erosion into streams, and improve secure habitat for grizzly bears.

Fish Habitat Improvement:

We support stream habitat work on the creeks throughout the area. We know that using materials from the timber management for these projects will restore streambank stability, reduce erosion and sediment loading, promote poor scour, and enhance riparian vegetation.

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 benefiting the land, local communities, and people. We appreciate the opportunity to comment on this draft EA.

Sincerely,

Rick Sandru, Ruby Valley Stock Association
Duke Gilman, Madison County Commissioner
John Anderson, Ruby Dell Ranch
Neil Barnosky, Ledford Creek Grazing Association
Emily Cleveland, Wild Montana
Chris Edgington, Montana Trout Unlimited
Kathryn Eklund, The Wilderness Society
Gary Giem, Warm Springs Grazing Association
Les Gilman, Gilman IH Cattle Co.
John Helle, Helle Livestock
Chad Klinkenborg, Montana Land Reliance
Sally Schrank, Greater Yellowstone Coalition
George Trischman, Ruby Valley Conservation District / Main Street Business
Jim Berkey, The Nature Conservancy
Donna McDonald, Upper Canyon Outfitters
Dan Durham, Ruby Habitat Foundation