

Data Submitted (UTC 11): 4/21/2026 7:55:06 PM

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04/21/2026

I submit this letter as a formal comment in opposition to the South Tobacco Roots Vegetation Project (#36754). I do not support moving forward with the project as proposed because the record does not yet demonstrate that the project will avoid or adequately mitigate impacts to wildlife habitat, water quality, soils, and recreational values for the following reasons.

1) Incomplete disclosure of purpose, need, and treatment rationale

The project materials should clearly distinguish between the purpose and need (the "why") and the proposed treatments (the "how"). Please provide the specific problem statements (e.g., target stand conditions, fuels metrics, insect/disease indicators, or desired vegetation composition), the data used to define baseline conditions, and the decision criteria that will determine success. Without these details, it is not possible for the public to evaluate whether proposed treatments are necessary, appropriately scaled, or likely to achieve stated objectives.

2) Impacts to wildlife habitat and connectivity

Vegetation treatments and associated temporary roads, landings, and increased access can fragment habitat and displace sensitive species. If the analysis relies on assumptions about retention, snag density, canopy cover, or buffer widths, those assumptions should be quantified and supported with citations.

3) Water quality, riparian areas, and erosion risk

The project area includes terrain where ground disturbance can increase sediment delivery to streams and wetlands, particularly during spring runoff and high-intensity precipitation events. If the project proposes prescribed fire or mechanical treatments near riparian areas, the analysis should address short- and long-term effects on shade, temperature, bank stability, and aquatic habitat.

4) Soil productivity and long-term site resilience

Mechanical treatments and repeated entries can compact soils, reduce infiltration, and impair regeneration

5) Recreation, access, and public safety

The South Tobacco Roots area is valued for dispersed recreation, hunting, and backcountry experiences.

6) Invasive species prevention and weed management

Disturbance from equipment and road work can introduce or spread invasive plants. The decision document should include enforceable prevention measures, early detection and rapid response, and dedicated funding/implementation responsibilities.

Conclusion

For the reasons above, I oppose the South Tobacco Roots Vegetation Project (#36754) as currently proposed. Please keep me on the mailing list for future updates, and please notify me of any additional opportunities to comment.

Sincerely,

Wendy Thomas