



September 19, 2025

Secretary Brooke Rollins
U.S. Department of Agriculture
140 Independence Avenue S.W.
Washington, DC 20250

Re: Stakeholder Comments on rescinding the Roadless Rule

Dear Secretary Rollins,

The Ruby Valley Strategic Alliance (RVSA) appreciates the opportunity to comment on the USDA Forest Service's (USFS) notice of intent to prepare an Environmental Impact Statement and rulemaking concerning the management of inventoried roadless areas on 44.7 million acres of National Forest lands. After careful consideration, we oppose full rescission of the Roadless Rule and request that USFS consider alternatives that modify the rule instead of completely rescinding.

RVSA is a diverse alliance of individuals and organizations that find common ground through shared 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 Ruby Valley.

Because of the 2001 Roadless Rule, protected roadless areas have offered abundant outdoor recreation opportunities such as hunting, fishing, camping, or other activities. In addition, roadless areas are important for clean water, wildlife habitat, and backcountry recreation opportunities. RVSA members have found that the Beaverhead-Deerlodge National Forest has improperly interpreted the roadless rule to prevent important forest management projects that impact forest users, fire mitigation, grazing allotments, motorized users, and timber harvest. The implementation of the Roadless Rule needs to be consistent across all areas of the USFS. RVSA acknowledges that the Roadless Rule is not perfect; we request the USFS develop a third alternative to modify and improve the Roadless Rule. We encourage the USFS to 1) clarify and update exceptions around local control with forest plans, infrastructure roads, grazing

allotment access and wildfire, 2) hold all forests accountable through their line officers for the implementation of the Roadless Rule and its exceptions and 3) fix extensive and numerous boundary issues.

Clarify and update existing exceptions in the Roadless Rule: A new alternative to modify the Roadless Rule should improve upon the existing exceptions in the Roadless Rule to ensure there is clear direction to the Forest Service to use these tools. The Rule already allows for fire response and vegetation management, including mechanical thinning, fuel reduction, temporary access roads in emergencies, and the use of helicopters, chainsaws, bulldozers and other equipment for fire suppression. In addition, the roadless rule provides exceptions for the use of motorized vehicles and maintenance of roads and trails for grazing allotments. A modified Roadless Rule should provide greater clarity and critical flexibility regarding the use of these tools coupled with common sense and collaboratively approved new tools, given changes in forest health that are driving increased fire risk in some areas.

Accountability Across Forests: A modified Roadless Rule should also ensure the exceptions are consistently used and implemented across the National Forest system. We understand that individual forests and different regions across the Forest Service are taking different approaches to implementing the existing flexibility within the Roadless Rule. This creates frustration and confusion for stakeholders, particularly grazing allotment holders and the timber industry, who work across multiple units of the Forest Service. We need a national strategy that ensures consistent implementation of existing tools across the national forest system, along with clear accountability and guidance to line officers.

Fix Boundary Issues: The original mapping that was used for the 2001 Roadless Rule was created from a 1977 inventory of roads and was never intended to be used for the creation of a land allocation rule. The Rule contains provisions to adjust boundaries, and these should be utilized. We recommend the USFS work with local forests, collaboratives, and working groups to identify and fix boundary issues that exist within the Roadless Rule areas. A modified Roadless Rule should be more specific and flexible in these boundary adjustments and must be based on common sense changes to specific roadless area boundaries, based on scientific analysis of fire risk, forest health, proximity to communities, and through collaborative work with local stakeholders and National Forest staff who know these areas best.

The RVSA respectfully requests that the USFS examine the essential modifications identified in our letter to create one or more alternatives in the EIS. We request that the USFS not rescind the Roadless Rule but create thoughtful alternatives for the public to consider that improve upon the Roadless Rule.

With appreciation,

Ruby Valley Strategic Alliance Membership

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

George Trischman, Former Chair, Montana Public Lands Council

Donna McDonald, Upper Canyon Ranch Outfitters

Duke Gilman, Madison County Commissioners

Chad Klinkenborg, Montana Land Reliance

Chris Edgington, MT Trout Unlimited

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