



December 5, 2025

Joshua Connors
5 Forest Service Road
Ennis, MT 59729

Re: Greenhorn Vegetation Project #51053

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=51053>

Dear Mr. Connors,

Please accept these comments on behalf of Wild Montana and our members in response to the public comment period for the Greenhorn Vegetation Project #51053 Supplemental Environmental Assessment (EA) and Finding of No Significant Impact (FONSI).

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our more than 100,000 supporters are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana's wild places.

Wild Montana members, supporters, and staff have been commenting on and otherwise engaging in Forest Service project design and planning since before the National Environmental Policy Act (NEPA) was enacted. We have a long history of submitting public comments under NEPA, including under the prior Forest Service NEPA regulations (36 CFR 220). We are extremely concerned about the myriad ways in which USDA's Department-wide NEPA regulations (7 CFR 1b) reduce or eliminate opportunities for public engagement, transparency, and robust environmental analysis in project decision making. Meanwhile, the Forest Service's move away from regular email communications, quarterly SOPA reports, and other previously standard means of public notification have put the onus on members of the public to actively seek out information about projects occurring on National Forest land, and has placed a high barrier to staying informed of Forest Service actions. In addition, USDA Secretary Memorandum



1078-006 declaring an emergency situation determination for over 112 million acres of the National Forest System allows emergency NEPA review and consultation procedures for many pest- and wildfire-related projects, allows the agency to only consider a no action and proposed action for projects analyzed under an Environmental Assessment or Environmental Impact Statement, and exempts these “emergency” projects from the USFS objection process. Alone, each of these changes would be worrisome. Combined, the effect is to leave the public in the dark about management of their National Forests and exclude them from participating, with a resulting degradation of the quality of Forest Service projects. To this point, researchers recently quantified the substantive influence of public comment on environmental decisions under NEPA, finding “that public comment influences agency decisions and is a valuable tool for agencies to gather information and refine plans, which could lead to more sustainable outcomes for affected communities and the natural world.”¹

With respect to the Greenhorn Vegetation project in particular, we appreciate that the Forest Service has opted to solicit public comments on this Supplemental EA and FONSI despite the new USDA NEPA procedures eliminating mandatory public comment periods for Environmental Assessments. This is especially important considering that this project is not subject to the administrative review (objection) process now that it is under the Emergency Action Determination (EAD). We understand and appreciate that this project has been many years in the making, with many prior opportunities for public comment and engagement. However, a 5-day comment period is seriously insufficient for meaningful public input. Even for those individuals who have been engaged in this project since it was first scoped, reviewing the Supplemental EA and associated documents and understanding changes incorporated since 2023 is time consuming.

By providing only 5 days to review these documents and prepare substantive comments, the Beaverhead-Deerlodge is essentially asking the public to drop everything and focus on this project, under the guise of it being an “emergency” when indeed, it is not. The field season is several months away and this project has been years in the making. Surely an additional 25 days for the public to review the supplemental EA—bringing the comment period to the previously-standard 30 days—would not make or break implementation of the project. We understand that the Forest must be responsive to national policies and Departmental/Agency priorities but line officers *do* have discretion related to when and how various authorities are utilized. We want to reiterate that we appreciate the Beaverhead-Deerlodge has opted to

¹ Ashley Stava et al., *Quantifying the Substantive Influence of Public Comment on United States Federal Environmental Decisions under NEPA*, 20 ENV'T RSCH. 1, 6 (2025).



provide any sort of public comment opportunity on the Supplemental EA, but we question why the forest chose to limit this comment period to 5 days, and why the EAD was applied to this project at this very late stage in the NEPA process.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Hilary Eisen
Federal Policy Director
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