



May 5, 2026

Kurt Hansen
District Ranger
101 SE First Street
Camp Crook, SD 57724

Re: Chalk Buttes Draft Environmental Assessment and FONSI

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68988>

Please accept these comments on behalf of Wild Montana and our members in response to the public comment period for the Chalk Buttes Draft Environmental Assessment and 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.

The Chalk Buttes rise abruptly and dramatically from the gentle rolling hills of the surrounding prairie, holding an ecosystem that is unique in the area. This island in the prairie provides sanctuary for many animal species, including mule deer, mountain lions, black bears, and some of the biggest trophy elk in the state. For people, the Buttes provide quiet hiking opportunities that are unique in the far southeastern corner of our state. It's not hard to see and feel why the Buttes are a sacred landscape to many Native American peoples, particularly to bands of the Great Sioux Nation. The ecological integrity of this area is key to retaining its cultural characteristics. It is critical that this project enhance, and not detract from, the unique backcountry character of the Chalk Buttes.

We support several elements of the proposed action, such as the removal of non-native Siberian elms and Russian olives, restoration of woody draws, and returning fire to the landscape through prescribed burning. However, we are concerned about the amount of



commercial harvest proposed and the impacts this will have on backcountry character. We also believe changes to the proposed actions are warranted in order to ensure stated restoration needs are met.

NEPA

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. Likewise, the ongoing rulemaking process to greatly constrain the agency's Administrative Review process seeks to eliminate many opportunities that the public currently has to engage in and influence Forest Service decision-making. These changes leave us worried about the direction the Forest Service is headed in terms of meaningfully engaging with the public with regards to public land management. With respect to this particular project, we appreciate that the Sioux Ranger District chose to host a public meeting regarding this project in February 2025, and that you are holding a 30-day comment period on this Draft EA and FONSI, despite the new USDA NEPA procedures eliminating mandatory public comment periods. However, we are concerned that there is a possibility the project will not be subject to administrative review. Because this NEPA process began before the revised 36 CFR 218 rule is published, the final EA, FONSI and ROD should be subject to the 36 CFR 218 regulations currently in effect regardless of whether the revised rule is completed prior to the ROD for this project.

Purpose and Need

The stated purpose of the Chalk Buttes project is to manage the fire-adapted ecosystem towards a mosaic of forest, grasslands, and woody draw vegetation to restore and improve overall ecosystem resiliency. In addition, the listed needs for the project are to: lessen the potential spatial extent and intensity of disturbances; maintain or improve long-term diversity and habitat quality for Species of Conservation Concern; reduce fuel loads to enhance fire suppression capabilities; and return a low to moderate intensity fire regime in the project area.¹

We are supportive of ecological restoration goals and we want to ensure that restoration activities are grounded in best available science, informed by best practices and ecological

¹ Chalk Buttes Environmental Assessment, page 8 (EA-1)



modeling, and have clear end goals. To this end, we suggest that the Forest Service look to The Society for Ecological Restoration International Principles & Standards for the Practice of Ecological Restoration, 2nd Edition² (SER Standards) for direction on how to best achieve restoration needs and goals in the project area. Although the EA does not indicate that the Forest Service drew from the SER Standards to inform its proposed actions, it does appear to be influenced by Carter County's concerns over grazable forestlands, as detailed in the County's 2021 *Chalk Buttes Grazable Forest Health and Fuels Reduction Plan* TIP proposal.³ If factors driving this project include achieving the goals set out in Carter County's TIP proposal, including increasing grazable forestland acres, the Forest Service should articulate this in the Purpose and Need statement.

Backcountry Area Management

This is the first time the Custer Gallatin is considering a significant amount of timber harvest within a designated Backcountry Area. Per the forest plan, backcountry areas are generally undeveloped or lightly developed, unroaded, or have few, primitive roads, and provide for more remote, semi-primitive recreation opportunities.⁴ The desired condition for backcountry areas is that natural processes play their role and human use leaves little permanent or long-lasting evidence.⁵ The Forest Plan (FW-SUIT-BCA-01) states that timber harvest is suitable in backcountry areas for purposes such as fuels reduction, restoration, or wildlife habitat enhancement. We are concerned that the amount of timber harvest proposed will negatively impact the Chalk Buttes' undeveloped character and the amount of temporary road proposed to accomplish this timber harvest will leave a long-lasting mark on the area. Together, these changes will lessen the backcountry area characteristics within the Chalk Buttes. The EA fails to justify why the proposed amount of commercial harvest and associated temporary roads are necessary to meet the Purpose and Need.

Although the opportunity to experience solitude is not necessarily hard to come by in this sparsely populated corner of our state, the opportunities for primitive and unconfined hiking in terrain with varying and challenging elevational changes is a rare resource on the plains. Even though there are no trails within the project area, the Chalk Buttes are highly valued for hiking

² Available at <https://www.ser.org/page/SERStandards/International-Standards-for-the-Practice-of-Ecological-Restoration.htm>

³ Available at <https://bloximages.chicago2.vip.townnews.com/billingsgazette.com/content/tncms/assets/v3/editorial/4/69/46963e7a-32c1-411f-8379-af945d74c180/6986620946019.pdf.pdf>

⁴ 2022 Custer Gallatin Forest Plan, pg. 125

⁵ 2022 Custer Gallatin Forest Plan, FW-DC-BCA



and other unconfined recreation opportunities. These recreation experiences benefit from the area's Backcountry Management designation. However, the recreation specialist report only discusses hunting and dispersed camping impacts. The final EA should detail how this project will impact unconfined recreation opportunities, including hiking, within the project area and how impacts will be mitigated.

Roads

During the forest plan revision Wild Montana advocated for the Chalk Buttes Backcountry Area to be managed for primitive recreation (non-motorized, non-mechanized). While the forest ultimately deemed the Buttes suitable for motorized and mechanized recreation, there are no existing motorized or mechanized trails and public road access is limited. This project, however, has the potential to turn what is a predominantly unroaded, non-motorized landscape into a highly roaded one, completely changing the character of the Backcountry Area.

The forest plan allows for temporary roads in the Chalk Buttes Backcountry Area⁶, but the language permitting this clearly indicates that use of temporary roads should be carefully considered. The Forest Plan's use of the word "may" ("temporary roads *may be* allowed") rather than stating outright that temporary roads *are* allowed indicates that this option should be used with discretion. Temporary roads should be eliminated from this project or limited to the bare minimum necessary for project objectives. If temporary roads are utilized, they should be constructed in such a manner that they can be fully obliterated immediately following the completion of commercial harvest. It is important that the temporary roads built to implement this project not become new recreational routes that facilitate new or expanded motorized and mechanized use in the Buttes and that the temporary roads do not move the project area away from forest plan compliance in terms of ecological health.

If temporary roads are authorized in the final decision, the EA should include additional transportation design features related for temporary roads beyond TR-01 to ensure that temporary roads do not leave permanent or long-lasting evidence, per FW-DC-BCA 01.⁷ We suggest that this EA incorporate the temporary road design features included in the Custer Gallatin National Forest's recently published Hyalite Cottonwood Hazardous Fuels Reduction Project EA, Appendix 8⁸:

⁶ 2022 Custer Gallatin Forest Plan, SX-STD-CBBCA 01

⁷ 2022 Custer Gallatin Forest Plan: "Natural processes play their role and human use leaves little permanent or long-lasting evidence."

⁸ <https://usfs-public.app.box.com/v/PinyonPublic/file/2192916265297>



- During temporary road construction, blading depth should be limited to the shallowest depth necessary. Skid trails, temporary roads, and landing areas will be shallow ripped to a depth of 4 to 14 inches in areas where obvious soil compaction or rutting has occurred, unless very rocky soil conditions exist.
- Temporary roads will be obliterated and recontoured to pre-existing condition. Excavated skid trails will be treated as temporary roads during rehabilitation. Obliteration shall consist of:
 - Prisms will be effectively closed to all wheeled vehicle motorized use.
 - Recontour road prisms to mimic pre-existing ground contours.
 - After recontouring, from 10 to 15 tons per acre of clearing or logging slash, stumps or other woody debris shall be placed and scattered uniformly on top of the recontoured corridor.
 - During obliteration, equipment is not permitted to operate outside the clearing limits.
- Temporary roads should not be constructed in RMZs except where necessary for stream crossings, unless approved by the Sale Administrator and constructed to specifications necessary to meet Forest Plan requirements. Site-specific mitigations will be provided for any approved temporary road construction in RMZs.
- Minimize construction of temporary roads.
- Public motorized use of temporary or administrative roads is not allowed. Barricades or other closure devices (e.g., temporary gates, logs and brush, earthen barriers, or similar) and signage will be used to prevent public use of temporary roads during implementation.
- Temporary roads within units with greater than 45-55% side slope will use full bench road construction techniques with end-haul.

We are also concerned that improvements made to Forest Service administrative roads (currently closed to public use) will lead to increased public use of these roads if the Forest Service does not utilize effective measures to block unauthorized access. This project should be an opportunity to improve, not weaken, compliance with the Sioux Ranger District Motor Vehicle Use Map. The EA should include a discussion of any existing issues with unauthorized motor vehicle use of administrative roads and Forest Service plans to ensure public motor vehicle use does not occur on administrative roads during and after project implementation. A judge recently ruled against the Kootenai National Forest's Knotty Pine Project because the forest had failed to



consider the impacts of unauthorized road use on grizzly bears.⁹ While grizzly bears are not a relevant topic for this analysis, the Knotty Pine case highlights that unauthorized use of Forest Service administrative roads brings impacts that should not be ignored in environmental analyses.

For clarity, maps in this EA should differentiate between project roads designated for public use on the district MVUM (3816, 38161, 381612, 38162, 38163, 38615, and 3816A), project roads that are open to administrative use only, and temporary roads.

Species of Conservation Concern

One of the stated needs for this project is to “maintain or improve long-term diversity and habitat quality for Species of Conservation Concern (SCC).”¹⁰ We are very supportive of this need and want to ensure that the project meets it as intended.

Since the only SCC in the project area are plants, it is important to carefully examine how the proposed actions will impact the SCC plant species in the Chalk Buttes. To “maintain or improve long-term diversity and habitat quality for SCC”, the project should be intentionally designed to support the recovery and persistence of at-risk plant species. The forest plan consistency table, however, notes that this project was not designed to achieve the forest plan Desired Condition that would most align with this need: FW-SC-PRISK-01 “Habitat conditions support the recovery and persistence of plant species that are recognized as at-risk species. Ecological conditions and processes that sustain the habitats currently or potentially occupied by these species are present.”¹¹ The Forest cannot simply assume that this desired condition will be met simply because vegetation management is occurring. To the contrary, it seems likely that the proposed action will move the Chalk Buttes away from this desired condition rather than toward it.

There are four species of SCC plants in the project area: oval-leaf milkweed; narrowleaf milkweed; heavy sedge, and Visher’s buckwheat.¹² During forest plan revision, the Forest Service described these species as being threatened by invasive species and/or impacts of

⁹ Order, Doc. 132, *Center for Biological Diversity v. U.S. Forest Serv.*, Case 9:22-cv-00091-DLC (D. Mont. Oct. 27, 2025)

¹⁰ Chalk Buttes Project Environmental Assessment, page 8 (EA-1)

¹¹ Chalk Buttes Project, Land Management Plan Consistency Table, pg. 10

¹² Chalk Buttes Project Botany Effects Analysis, pg. 2.



livestock grazing and did not list ponderosa pine encroachment as a threat to any of them.¹³ Therefore, to achieve the stated need for the project of maintaining or improving long-term diversity and habitat quality for SCC, the project actions should focus on treating existing populations of invasive weeds; mitigating mechanisms for invasive introduction and spread, and reducing the impacts of grazing on SCC plants.

Rather than maintaining or improving long-term diversity and habitat quality for SCC plants in the Chalk Buttes, this project seems likely to have the opposite effect. It is likely to increase livestock access (a goal described in the Carter County TIP proposal referenced earlier) and therefore increase impacts to SCC plants. The project is also expected to increase invasive weeds in the Chalk Buttes, to the detriment of local SCC. The EA notes that temporary road construction has the potential to facilitate the introduction of noxious and invasive weed species and/or the expansion of existing populations of known noxious weeds in the project area.¹⁴ To meet the Forest Service's stated need to "maintain or improve long-term diversity and habitat quality for SCC", temporary road construction should not be permitted, since this will increase rather than reduce threats to plant SCC.

Wildlife

Due to their unique ecosystem, the Chalk Buttes provide important habitat for wildlife, including the endangered northern long-eared bat as well as golden eagles and other raptors, migratory birds, elk and deer, black bears, and many smaller mammals. Visitors to the Chalk Buttes value the opportunity to view wildlife and the hunting opportunities offered here are also highly valued. Therefore, we are concerned that the wildlife effects analysis is lacking, inconsistent or inaccurate in several respects.

The wildlife specialist report concludes "Consistent with the Forest Plan, the proposed action would maintain or move toward the desired condition for wildlife habitats and improved foraging, nesting, roosting, and security for wildlife resources in the project area."¹⁵ However, this conclusion is not supported by the effects analysis, and for some species the analysis is directly

¹³ Custer Gallatin National Forest Revised Forest Plan Species of Conservation Concern Rationale (2021). Available at <https://www.fs.usda.gov/media/1498>

¹⁴ Chalk Buttes Project Environmental Assessment pg. EA-12.

¹⁵ Chalk Buttes Project Wildlife Effects Analysis, pg. 17.



to the contrary. For example, the effects analysis concludes that several bat species will be highly impacted, including causing direct mortality during pup season.¹⁶

For the federally endangered northern long-eared bat in particular, the EA notes that the proposed action “may affect and is likely to adversely affect” the species.¹⁷ This determination requires formal consultation with the U.S. Fish and Wildlife Service (USFWS). The EA does not indicate a Biological Opinion has been obtained by the USFWS,¹⁸ thus indicating that the Forest Service has not completed Section 7 consultation with the USFWS. Therefore, the wildlife specialist report is inaccurate in concluding that “The no action alternative and the proposed action alternative comply with the ESA”.¹⁹

Monitoring

The draft EA mentions that monitoring will occur—specifically post-project monitoring for invasive weeds, soil disturbance monitoring during project activities, and cultural resource monitoring—but it gives no details about how monitoring will be conducted. To ensure that monitoring is effective and actually conducted, the EA should include monitoring plans and benchmarks for Forest staff, and the public, to reference moving through project implementation.

Project Effectiveness

The Flathead National Forest recently withdrew a landscape restoration EIS that had been in the works for many years, in part because ground surveys revealed that the Forest had vastly overestimated available timber volume based on satellite imagery, and therefore many of the proposed treatments could not be implemented. Has the Forest Service conducted the necessary field work in the Chalk Buttes to ensure the proposed vegetation treatments, including commercial harvest, are appropriate for the proposed locations and will accomplish project objectives?

¹⁶ See Chalk Buttes Project: Wildlife Effects Analysis, pg. 15: “Vegetation management activities are expected to impact active bat habitat (summer, spring, and fall) from the loss or alteration of roosting habitat and foraging habitat. Bats roosting on the landscape during these activities may be killed or harmed through tree felling and prescribed fire activities, with effects particularly pronounced during the pup season when bats may be non-volant.”

¹⁷ Chalk Buttes Environmental Assessment, pg. EA-19.

¹⁸ See Table 4 in the Chalk Buttes Environmental Assessment, pg. EA-23.

¹⁹ Chalk Buttes Project Wildlife Effects Analysis, pg. 17.



The Forest Service should incorporate new information gleaned, or additional issues addressed, as a result of public comment into its analysis. Furthermore, to the extent that the scope of this project changes after this comment period, the public should be notified of changes and provided with another opportunity to provide feedback. Because of changes to Forest Service and USDA NEPA procedures, this draft EA comment opportunity is the public's primary (and possibly only) opportunity to shape project design. Therefore, it is even more important that the Forest Service carefully consider public input and be willing to modify the project based on comments received before signing a final decision.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions. Weather permitting, I intend to travel to the Chalk Buttes for a site visit on May 21 and hope to have the opportunity to discuss these comments in person at that time.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen", with a long horizontal line extending to the right.

Hilary Eisen
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