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May 13, 2026

Kurt Hansen
District Ranger
Custer Gallatin National Forest
Sioux Ranger District
P.O. Box 37
101 S.E. 1st Street
Camp Crook, SD 57724

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

RE: Chalk Buttes Preliminary Environmental Assessment (project #68988)

Dear Mr. Hansen,

On behalf of Defenders of Wildlife and the Center for Biological Diversity, thank you for the opportunity to provide comments on the Preliminary Environmental Assessment (EA) for the Chalk Buttes Project on the Custer Gallatin National Forest. This project is being conducted under a Good Neighbor Authority agreement with the Montana Department of Natural Resources and Conservation.

While we appreciate certain elements of the proposed action (i.e., the removal of non-native Siberian elms and Russian olives), we are concerned that the project's purported restoration benefits have been misrepresented, along with flaws in the analysis of anticipated project impacts to at-risk species as outlined below.

Purpose of the project for "restoration"

A stated purpose for the project is "…to restore and improve overall ecosystem resiliency with a variety of management tools."[1] Ecological restoration is complex and the science is constantly evolving as research, experimentation and practice contribute to our understanding. In our experience, the Forest Service is using the term "restoration" for a variety of activities, some of which do not meet the definition. For example, we see it applied to land treatments designed to modify lands but not restore them to specific conditions informed by pre-disturbance conditions, ecological

[1] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-1.

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reference models and best practices. Executed absent a rigorous science-based framework, "restoration" can cause significant harm.

Hence, it is imperative that the Forest Service ensure that its restoration strategies and actions are consistent with high-quality scientific information. We consider the Society for Ecological Restoration International Principles & Standards for the Practice of Ecological Restoration, 2nd Edition (SER Standards) to be the leading guide for ecological restoration.[2] The SER Standards provides "a robust framework for restoration projects to achieve intended goals, while addressing challenges including effective design and implementation, accounting for complex ecosystem dynamics (especially in the context of climate change), and navigating trade-offs associated with land management priorities and decisions."[3] The SER standards are widely accepted and endorsed internationally. The proposed action should be modified to draw from the SER Standards, including addressing the underlying causal factors of degradation, including using an ecologically appropriate reference as the target of restoration, and clarifying the imperative for restoration activities to support ecosystem recovery processes.

Need for the project for Species of Conservation Concern (SCC)

A stated need for the project is to "maintain or improve long-term diversity and habitat quality for Species of Conservation Concern (SCC)."[4] We support this need in concept, but do not agree that this outcome would be realized by the proposed action.

Greater sage-grouse (Centrocercus urophasianus)

Greater sage-grouse is an SCC for the Custer Gallatin.[5] The EA states there are no wildlife SCC in the project area.[6] However, the contracted wildlife specialist report notes the project area provides year-round habitat for greater sage-grouse[7] yet provides no analysis for them. The EA must take a hard look at potential project impacts to greater sage-grouse and avoid degradation of its habitat.

The plan consistency table lists all plan components for greater sage-grouse as "not applicable" because "this species is not known to occur in the project area."[8] This is an inappropriate approach to

[2] Gann G.D., et al (2019) International principles and standards for the practice of ecological restoration. Second edition. Restoration Ecology 27:S1-S46 https://doi.org/10.1111/rec.13035
[3] *Id.*, pg. S3.
[4] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-1.
[5] U.S. Forest Service (2021) Species of Conservation Concern List for the Custer Gallatin National Forest's Revised Land Management Plan https://www.fs.usda.gov/sites/nfs/files/legacy-media/r01/20210421_CG_SCC_RF%20Letter.pdf
[6] *Id.*, pg. EA-19.
[7] Copperhead Environmental Consulting, Inc. (March 25, 2026) Chalk Buttes Project: Wildlife Effects Analysis at pg. 21.
[8] U.S. Forest Service (March 25, 2026), Chalk Buttes Project, Sioux Ranger District Land Management Plan Consistency Table Index at pgs. 118-119.

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SCC management, which should be based on habitat suitability and potential for species occurrence rather than requiring SCC to be documented in a project area for fine-filter plan components to apply.

Indeed, several plan components are designed for greater sage-grouse *habitat,* including general habitat (e.g., FW-STD-WLSG-01). The eastern side of the project area appears to overlap general habitat[9] for greater sage-grouse and therefore these plan components should apply. Specifically, to comply with standard FW-STD-WLSG-01, prescribed fire should be excluded from sage grouse habitat to avoid loss of sagebrush canopy cover. The FEIS for the revised land management for the Custer-Gallatin notes that "In order to achieve no net loss of habitat, prescribed fire would be limited in general and priority sage-grouse habitat (FW-STD-WLSG-01)."[10] Montana's *Management Plan and Conservation Strategies for Sage Grouse* similarly advises against the use of fire to manage sage grouse habitats,[11] as does the U.S. Fish and Wildlife Service.[12]

Since the replacement of native perennial bunchgrass communities by invasive annuals is a primary contributing factor to increasing fire frequencies in the sagebrush ecosystem, every effort must be made to retain the native plant community in the project area. Ground disturbances caused by the proposed action (e.g., temporary road construction, mastication treatments) may provide opportunities for invasive species to become established in the area. These risks warrant a hard look. The plan consistency review notes "[i]nvasive species occur within the project area,"[13] but no map is provided showing such known infestations in relation to the proposed treatments. Design features NOX-01 and NOX-02[14] are inadequate to prevent the expansion of invasive species due to project activities. NOX-01 is post-project monitoring and imposes no prevention requirements, nor any

[9] *See* Montana Sage Grouse Habitat Conservation Program's Montana Sage Grouse Habitat Conservation Map at https://sagegrouse.mt.gov/ProgramMap

[10] U.S. Forest Service (2022), Volume 1 Final Environmental Impact Statement for the Land Management Plan Custer Gallatin National Forest at pg. 298. https://www.fs.usda.gov/sites/nfs/files/legacy-media/custergallatin/Custer%20Gallatin%20FEIS%20Volume%201%20March%20Final.pdf

[11] Montana Sage Grouse Work Group (2005) Management Plan and Conservation Strategies for Sage Grouse in Montana at pg. 46 https://fwp.mt.gov/binaries/content/assets/fwp/conservation/wildlife-reports/sage-grouse/sgfinalplan.pdf

[12] US Fish and Wildlife Service. 2013. Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report at pg. 44: "The intentional removal or treatment of sagebrush (using prescribed fire, or any mechanical and chemical tools to remove or alter the successional status of the sagebrush ecosystem) contributes to habitat loss and fragmentation, a primary factor in the decline of sage-grouse populations. Removal and manipulation of sagebrush may also increase the opportunities for the incursion of invasive annual grasses, particularly if the soil crust is disturbed (Beck et al. 2012). Although many treatments are often presented as improving sage-grouse habitats, data supporting the positive impacts of sagebrush manipulation on sage-grouse populations is limited (Beck et al. 2012)." Available from: https://www.wlfw.org/wp-content/uploads/2013/07/USFWS_ConservationObjectives-report.pdf

[13] U.S. Forest Service (March 25, 2026), Chalk Buttes Project, Sioux Ranger District Land Management Plan Consistency Table Index at pg. 35.

[14] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. APPENDICES-11.

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treatment requirements if invasives are detected. NOX-2 requires avoiding existing noxious weed patches “where possible.”[15] It is unclear how NOX-02 will effectively be implemented without pre-project surveys being conducted to inform avoidance areas. Noxious weed surveys/inventories should be done pre-implementation, mapped and disclosed as part of the NEPA analysis, and used to inform project design. Otherwise, the design features as proposed are likely to be too little, too late.

A stated purpose of the pine removal project is to increase livestock stocking capacity in the Chalk Buttes area.[16] Increased livestock grazing in greater sage-grouse habitat, however, poses documented risks to the sagebrush steppe ecosystem upon which this species depends. Cattle selectively graze native perennial bunchgrasses — the same grasses that greater sage-grouse require for nesting cover and brood-rearing habitat — reducing their abundance and competitive ability and thereby giving cheatgrass (*Bromus tectorum*) a foothold in the plant community.[17] Cattle grazing exacerbates dominance of cheatgrass — one of the most destructive invasive plants in the sagebrush biome — by reducing native bunchgrass cover and biological soil crusts that otherwise resist invasion.[18] The cheatgrass-driven wildfire cycle in turn causes long-term sage-grouse population declines; one study projecting that if current wildfire trends fueled by invasive annual grasses continue unabated, sage-grouse populations will be reduced to 43% of their present numbers over the next three decades.[19] Native grasses also provide critical nesting cover: a long-term study of sage-grouse nests in the Powder River Basin of southeast Montana and northeast Wyoming found that grass height was highly predictive of nest survival, with positive effects consistent across study years and study areas.[20] The *Carter County Grazable Forestland Health and Fuels Reduction Plan* itself acknowledges that the sagebrush steppe surrounding the Chalk Buttes currently supports "ideal nesting and brood rearing habitat for Greater Sage Grouse with nearby leks."[21] The EA must analyze how increased livestock grazing resulting from the proposed pine removal may affect cheatgrass establishment, native grass height and cover, sagebrush canopy, and native plant community composition in this habitat — risks that are not addressed in the current analysis.

[15] *Id.*
[16] USDA-NRDCS (2022) Chalk Buttes Grazable Forestland Health and Fuels Reduction Plan, pg. 4; *also see* U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-20.
[17] Michael D. Reisner et al., *Conditions Favouring Bromus tectorum Dominance of Endangered Sagebrush Steppe Ecosystems*, 50 J. Applied Ecology 1039 (2013)
[18] *Id.*
[19] Peter S. Coates et al., *Wildfire, Climate, and Invasive Grass Interactions Negatively Impact an Indicator Species by Reshaping Sagebrush Ecosystems*, 113 Proc. Nat'l Acad. Sci. 12745 (2016).
[20] Kevin E. Doherty et al., *Linking Conservation Actions to Demography: Grass Height Explains Variation in Greater Sage-Grouse Nest Survival*, 20 Wildlife Biology 320 (2014).
[21] USDA-NRDCS (2022) Chalk Buttes Grazable Forestland Health and Fuels Reduction Plan, pg. 4.

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SCC Plants

The project area supports four species of SCC plants (oval-leaf milkweed; narrowleaf milkweed; heavy sedge, and Visher's buckwheat).[22] Contrary to the stated need, the plan consistency table notes that this project was not designed to attain desired condition FW-SC-PRISK-01 for at-risk plants.[23] To achieve the stated need, the project should be intentionally designed to support the recovery and persistence of at-risk plants. The Forest should not just presume an outcome of moving toward this desired condition merely by chance. Moreover, without modification, this project is likely to move away from this desired condition rather than toward it.

The contracted botany effects analysis describes adverse impacts to the four SCC plant species as follows:

> "Direct effects of the proposed action may include loss of SCC individuals from trampling or crushing by vehicles, equipment, or personnel; ground disturbance from project activities and roads; or modification of habitat during project activities. Construction of temporary roads, maintenance of existing roads, heavy equipment activity, and prescribed burning would all pose a risk for a small reduction in potential habitat loss in the short term… Indirect effects on SCC species include the possible introduction of noxious and invasive weed species and/or the expansion of existing populations… In summary, the proposed action activities may lead to disturbance of at-risk plant habitats and/or destruction of at-risk plants. It is possible that some individuals may be lost, but protections of known populations and application of design feature BOT-01 would ensure the persistence of the species in the project area. Effects from disturbance to plant habitats should be short-term in nature. Over the long-term, project activities would improve the habitat quality of at-risk plants and move the project area towards desired conditions. With design features to minimize effects to SCC plants, the proposed action would not result in a loss of viability to SCC plants or a trend toward federal listing."[24]

We disagree with the assumptions that disturbance effects will necessarily be "short-term"[25] in nature and that project activities would improve habitat quality long-term. Table 1 summarizes the Forest's rationales for the underlying causes for these species being deemed at-risk in the plan area. All four SCC plants are threatened by invasive species and/or impacts of livestock grazing; none are noted as being threatened by ponderosa pine encroachment (Table 1).

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[22] KC Harvey Environmental, LLC. (March 2026) Chalk Buttes Project: Botany Effects Analysis, pg. 2.

[23] U.S. Forest Service (March 25, 2026), Chalk Buttes Project, Sioux Ranger District Land Management Plan Consistency Table Index at pg. 10: "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."

[24] KC Harvey Environmental, LLC. (March 2026) Chalk Buttes Project: Botany Effects Analysis, pgs. 5-6.

[25] Defined in KC Harvey Environmental, LLC. (March 2026) Chalk Buttes Project: Botany Effects Analysis, at pg. 2 as "The short-term effects timeframe used for this analysis is 10 to 15 years for implementation." This is an inappropriately long temporal scale to consider "short-term."

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Table 1 *The Forest's rationales for the underlying causes for these species being deemed at-risk in the plan area.*

SCC Plants	**Relevant threats in the plan area***
Oval-leaf milkweed (*Asclepias ovalifolia*)	This habitat type is vulnerable to weed invasion and livestock trampling.
Narrowleaf milkweed (*Asclepias stenophylla*)	In the plan area and in general, this habitat type is vulnerable to weed invasion.
Heavy sedge (*Carex gravida* var. *gravida*)	Habitats include moist, green ash woodlands, which are attractive to livestock, and it may be particularly vulnerable to moderate grazing because of its cespitose growth form. These habitats are also quite vulnerable to invasion by non-native plants.
Visher's buckwheat (*Eriogonum visheri*)	In the plan area, vulnerable to livestock trailing at the single known location.

*As described in the Forest Service's species evaluations used to identify plant species as SCC for CGNF final plan. Available from: https://www.fs.usda.gov/media/1498

Instead of benefitting at-risk plants, this project would foreseeably have the opposite effects. The *Chalk Buttes Grazable Forestland Health and Fuels Reduction Plan* describes the impetus for the proposed action, stating, "The stands are so dense that it is difficult for landowners to effectively graze the herbaceous understory with livestock, thus reducing the stocking capacity of the affected acres."[26] The proposed action will foreseeably increase livestock access and associated impacts to SCC plants—an impact that can reasonably be expected to persist long after implementation and warrants a hard look. The contracted botany analysis fails to consider this mechanism for effects. Instead, it inappropriately concludes that "Additional activities occurring in or adjacent to the project area include ongoing road maintenance and active grazing allotments, including planned ranch improvements. These actions would not alter the baseline for this effects analysis, and significant effects on botany resources from the proposed action in conjunction with other activities would not be expected to occur."[27] This is an entirely unreasonable conclusion given the intent of the project to increase cattle stocking capacity.

The project is also expected to exacerbate the threat of invasive species. As noted in the EA, 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.[28] Temporary road construction should be eliminated from the proposed action since it is contrary to the stated need and will exacerbate rather than lessen threats to SCC. To genuinely address the stated need to "maintain or improve long-term diversity and habitat quality for Species of Conservation Concern (SCC)"[29], the project should focus on the reducing the relevant threats

[26] USDA-NRDCS (2022) Chalk Buttes Grazable Forestland Health and Fuels Reduction Plan, pg. 3.
[27] KC Harvey Environmental, LLC. (March 2026) Chalk Buttes Project: Botany Effects Analysis, at pg. 7.
[28] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-12.
[29] *Id.*, pg. EA-1.

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identified in the species evaluations (i.e., treating existing populations of invasives; mitigating mechanisms for invasive introduction and spread, and reducing the impacts of grazing on SCC plants) (Table 1).

Northern long-eared bat (*Myotis septentrionalis*)

The EA notes that the proposed action "may affect and is likely to adversely affect"[30] the federally endangered northern long-eared bat, a determination requiring formal consultation with the U.S. Fish and Wildlife Service (USFWS). Table 4 of the EA shows "Applicable proposal record documentation to support ESA compliance," but only lists a Biological Assessment and not a Biological Opinion.[31] The contracted wildlife specialist report prematurely concludes that "The no action alternative and the proposed action alternative comply with the ESA"[32] without the Forest Service having completed Section 7 consultation with the USFWS.

Suckley's cuckoo bumble bee *(Bombus suckleyi)*

The EA draws problematic and inconsistent conclusions on project effects to Suckley's cuckoo bumble bee, a proposed endangered species.[33] The EA concludes "The project's proposed treatments may impact habitat in the short term but one of the project objectives is to promote woody draw and riparian area expansion with ponderosa pine encroachment treatments such as thinning and prescribed burns. Therefore, the proposed action would have no effect on Suckley's cuckoo bumble bee."[34] It is inappropriate to assume beneficial outcomes based on the stated objective for a project, rather than actual analysis of project effects.

The rationale for "no effects" is also illogical. Short term effects and "no effect" are not the same thing. Further, the effects are such that in the context of the Endangered Species Act (ESA), the Forest Service's Section 7 consultation (conferencing) obligations would be triggered. The USFWS and National Marine Fisheries Service's *Endangered Species Consultation Handbook* described beneficial effects as "…those effects of an action that are wholly positive, without any adverse effects, on a listed species or designated critical habitat. Determination that an action will have beneficial effects is a "may affect" situation".[35] Therefore, even if this project had wholly positive effects, without

[30] *Id*., pg. EA-19.
[31] *Id*., pg. E-23.
[32] Copperhead Environmental Consulting, Inc. (March 25, 2026) Chalk Buttes Project: Wildlife Effects Analysis at pg. 17.
[32] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-19.
[33] 89 FR 102074
[34] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-19.
[35] U.S. Fish and Wildlife Serv. and Nat'l Marine Fisheries Serv., Endangered Species Consultation Handbook, 4-50 (1998) at pg. 4-26. Available from: https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf.

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any adverse effects, on Suckley's cuckoo bumble bee, the ESA effects determination of "no effect" in the EA still would not be appropriate. However, the effects analysis acknowledges that the project's "proposed treatments may impact habitat in the short term." These impacts are not wholly positive, nor are they necessarily "short term." The EA characterizes "short-term effects" as "generally within 10 to 15 years of implementation."[36] Suckley's cuckoo bumble bee has an annual lifecycle[37] and therefore this timeframe has the potential to impact this species for ten to fifteen generations. The EA notes that long-term changes in vegetation arising from this project are anticipated to span over 50 years post-treatment[38] (representing fifty generations of this species). Impacts of the proposed action are not "short-term" at the timescale that is relevant to the species.

The proposed action may affect Suckley's cuckoo bumble bee and its habitat in several ways. For example, timber activities may cause direct mortality if heavy equipment crushes active nest and diapause sites; thinning and fuels treatment may remove or reduce floral resources, introduce invasive plants, and compact soil with heavy equipment.[39] These potential mechanisms for effects must be properly analyzed. A project design feature should also be added to specify that the seed mix must be composed exclusively of native plants with a diversity of ecoregionally appropriate species that benefit pollinators. The EA only vaguely commits to an "appropriate seed mix."[40] Since a stated need for the project is to "improve overall ecosystem resiliency" and to "maintain or improve long-term diversity and habitat quality,"[41] reseeding should use only native plants consistent with best available science.[42]

Regal fritillary butterfly (*Speyeria idalia*)

The contracted wildlife specialist report states "A Biological Assessment for federally listed species including northern long-eared bat (*Myotis septentrionalis*), monarch butterfly (*Danaus plexippus*), Suckley's cuckoo bumble bee (*Bombus suckleyi*), and regal fritillary butterfly (*Speyeria idalia*) is being

[36] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-5.
[37] U.S. Fish and Wildlife Service (2024) Species Status Assessment for Suckley's Cuckoo Bumble Bee at pg. 15. Available from: https://iris.fws.gov/APPS/ServCat/DownloadFile/263505
[38] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-5.
[39] U.S. Fish and Wildlife Service (2024) Species Status Assessment for Suckley's Cuckoo Bumble Bee at pg. 119. Available from: https://iris.fws.gov/APPS/ServCat/DownloadFile/263505
[40] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. APPENDICES-13.
[41] *Id*., pg. EA-1.
[42] *See*, for example, Baughman, Owen, Sarah Kulpa, and Roger Sheley. 2022. Four paths toward realizing the full potential of using native plants during ecosystem restoration in the Intermountain West. Rangelands, Volume 44, Issue 3, 2022, Pages 218-226, https://www.sciencedirect.com/science/article/pii/S0190052822000037; USDA Forest Service, 2012. Native Plant Materials Policy: A Strategic Framework; Pedrini, S. and Dixon, K.W. (2020), International principles and standards for native seeds in ecological restoration. Restor Ecol, 28: S286-S303. https://doi.org/10.1111/rec.13155.

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completed by the CGNF biologist for submittal and concurrence with the USFWS."[43] Regal fritillary butterfly is entirely absent from the EA and this inconsistency should be rectified. The EA should take a hard look at potential impacts to the western subspecies (now *Argynnis idalia occidentalis*).[44]

Other wildlife

There are many logical inconsistencies between the conclusions made in the contracted wildlife specialist report and the land management plan consistency review. The plan consistency table states that "This project was not designed to restore wildlife habitat or populations."[45] 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."[46] This conclusion lacks substantiating analysis and for some species the analysis is directly to the contrary. For several bat species, the specialist report states "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."[47] Likewise, the effects analysis identifies generally adverse effects of the project on raptors:

> "Effects on goshawks as a result of the proposed action include changes or alterations in nesting and foraging habitat as vegetation composition and density change from vegetation management activities, as well as displacement from noise disturbance and vegetation management activities….Similar to other raptor species, the proposed action has the potential to impact merlins through changes or alterations to nesting and/or foraging habitat, or through noise disturbance, either of which can cause merlins to disperse... Like other raptors, the proposed action has the potential to affect bald and golden eagles through changes in habitat and noise disturbance, which can cause dispersal or nest abandonment."[48]

The report baselessly presumes beneficial impacts in the long-term with no substantiating rationale.[49] Conclusions regarding anticipated project impacts to wildlife need to be scientifically supported and logically consistent.

[43] Copperhead Environmental Consulting, Inc. (March 25, 2026) Chalk Buttes Project: Wildlife Effects Analysis at pg. 17.
[44] U.S. Fish and Wildlife Service (September 2023) Species Status Assessment for Regal Fritillary (*Argynnis* (*Speyeria*) *idalia*): Eastern Subspecies (*Argynnis idalia idalia*) and Western Subspecies (*A. i. occidentalis*). Available from: https://iris.fws.gov/APPS/ServCat/DownloadFile/253168
[45] U.S. Forest Service (March 25, 2026), Chalk Buttes Project, Sioux Ranger District Land Management Plan Consistency Table Index at pg. 95.
[46] Copperhead Environmental Consulting, Inc. (March 25, 2026) Chalk Buttes Project: Wildlife Effects Analysis at pg. 17.
[47] *Id.*, pg. 15.
[48] *Id.*, pgs. 10-11.
[49] *Id.*, pg. 11.

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There is also no analysis, for any species, on the impacts of proposed mastication of 200-foot buffers along Forest Service roads in the project area[50] (i.e., fuel breaks). It is unclear from the EA if these "buffers" extend 200 feet from the center of the road, or 200-feet from each side of the road. The EA also notes open-endedly that "Mastication may be used as well in grassland treatments."[51] The ecological impacts of these roadside fuel breaks warrant a hard look, including habitat loss and fragmentation, edge effects, facilitation of annual grass invasion, and predator-prey interactions.[52]

More generally, we are concerned that much or all of the environmental analysis for this project has been contracted, with no indication that the products have been reviewed by a Forest Service biologist familiar with the project area and species.[53] This outsourcing has poorly served the process of considering environmental impacts, given the complete omission of greater sage-grouse and analytical inaccuracies for several other species.

Thank you once again for the opportunity to provide comments. Please feel free to contact us with any questions.

Sincerely,

Keats Conley
Senior Policy and Planning Specialist
Defenders of Wildlife
kconley@defenders.org
720-943-4280

Randi Spivak
Public Lands Policy Director
Center for Biological Diversity
rspivak@biologicaldiversity.org

[50] U.S. Forest Service (April 2026), Chalk Buttes Preliminary Environmental Assessment and Finding of No Significant Impact at pg. EA-3.
[51] *Id.*
[52] *See*, e.g., Shinneman, D.J., Aldridge, C.L., Coates, P.S., Germino, M.J., Pilliod, D.S., and Vaillant, N.M., 2018, A conservation paradox in the Great Basin—Altering sagebrush landscapes with fuel breaks to reduce habitat loss from wildfire: U.S. Geological Survey Open-File Report 2018–1034, 70 p., https://doi.org/10.3133/ofr20181034.
[53] *See* Forest Service Manual 2634.03 Policy 3 to "Use journey level wildlife and fisheries biologists to conduct or approve habitat examinations; Forest Service Manual 2672.41 "Standards for Biological Evaluations": "In order to meet professional standards, biological evaluations must be conducted or reviewed by journey or higher level biologists or botanists (FSM 2634)."