

## CHECKLIST ENVIRONMENTAL ASSESSMENT

<b>Project Name:</b>	2018 Land Banking – Conrad Unit – CLO – Miller Colony
<b>Proposed Implementation Date:</b>	2018
<b>Proponent:</b>	These tracts were nominated by the lessee, Miller Colony, and brought forward now by DNRC.
<b>Location:</b>	SW4NE4, Section 3, T25N, R6W, 40.00 acres, Teton County, (CB) W2SE4, Section 2, T25N, R6W, 80.00 acres, Teton County, (CS) W2NE4, Section 11, T25N, R6W, 80.00 acres, Teton County, (CS) Total (CB) Acres: 40.00 Total (CS) Acres: 160.00
<b>County:</b>	Teton County
<b>Trust:</b>	Commons Schools (CS) and Capitol Buildings (CB)

### I. TYPE AND PURPOSE OF ACTION

Offered for Sale at Public Auction are 200.00 acres of state land currently held in trust for the benefit of Capitol Buildings and Common Schools. Revenue from the sale would be deposited in a special account, with monies from other sales around the State, to purchase replacement lands meeting acquisition criteria related to legal access, productivity, potential income, and proximity to existing state ownership which would then be held in trust for the benefit of the same beneficiary Trust in relative proportion. The 2003 State Legislature passed statutes (77-2-361 through 367 MCA) authorizing the Department of Natural Resources and Conservation (DNRC) to sell State School Trust Lands and utilize those funds to purchase replacement lands for the school trust through a process called Land Banking. The intent of the program is for the state to dispose of scattered tracts of land that generally do not have legal access, generate substantially less income for the trust than their relative value or are difficult for the DNRC to manage. The funds generated from sales are then used to purchase property that is blocked or contiguous to state land, has legal access, has potential for increased Trust revenue and consequently is more efficient to manage. In 2005 the Department began accepting nominations from lessees and DNRC personnel for state tracts to be considered for sale under the program. Nominations were evaluated and the State Board of Land Commissioners (Board) prioritized for sale. To date the DNRC and the Board has sold 79,547 acres and purchased 71,058 acres.

Two maps are attached to this EA checklist: 1. Labeled "Appendix A" - Land Banking Priorities- Teton County is a general map of all state land within that area of the county (blue) and the parcels of land being considered for sale under land banking (dark blue). 2. Labeled "Appendix B" is satellite imagery maps that indicate the tracts being considered for sale in the EA checklist.

### II. PROJECT DEVELOPMENT

#### 1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

*Provide a brief chronology of the scoping and ongoing involvement for this project.*

- Legal notices were published in the in the Chateau Acantha on 04/18/2018 and 05/02/2018.
- Direct mailings were made to lessees, adjacent land owners, County Commissioners, State Legislators (from the involved Districts and who were associated with the legislation), and a host of organizations and individuals who had expressed previous interest in this process. A full listing of contacts is attached as Appendix C.

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**2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:**

No other governmental agencies have jurisdiction over this proposal.

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**3. ALTERNATIVES CONSIDERED:**

Alternative A (No Action) – Under this alternative, the State retains the existing land ownership pattern and would not sell the 200.00 acres of state land currently held in trust for the benefit of Capitol Buildings and Common Schools.

Alternative B (the Proposed action) – Under this alternative, the Department would request and recommend approval by the Land Board to sell the 200.00 acres of state land currently held in trust for the benefit of Capitol Buildings and Common Schools. If approved by the Board, the sale would be at public auction, subject to the requirements found in Title 77, Chapter 2, Part 3 of the Montana Codes Annotated. The income from the sale would be pooled with other land sale receipts from across the State to fund the purchase of other state land, easements, or improvements for the beneficiaries of the respective trusts. *(The State would then review available lands for sale which would generally have access and an increased potential for income. A separate public scoping and review would be conducted when a potentially suitable parcel was found. It is not possible for this analysis to make any direct parcel to parcel comparisons.)*

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<b>III. IMPACTS ON THE PHYSICAL ENVIRONMENT</b>
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| <ul style="list-style-type: none"><li>• <i>RESOURCES</i> potentially impacted are listed on the form, followed by common issues that would be considered.</li><li>• Explain <b>POTENTIAL IMPACTS AND MITIGATIONS</b> following each resource heading.</li><li>• Enter "NONE" if no impacts are identified or the resource is not present.</li></ul> |
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**4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:**

*Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.*

The information listed below provides a general outline of the soil types on the tracts proposed for sale. USDA – NRCS soil survey indicated Land Capability Classification for Section 2, T25N, R6W as a mixture of 4E-65%, and 7E-35% soils. The 4E and 7E soils consisting of 80.00 acres are currently utilized for grazing (sacrifice area)-72.02 acres, an Ag. Building Site-5.00 acres, and agriculture-2.98 acres. These classes of soil are generally not suitable for small grain crop production. This tract would not meet current DNRC breaking criteria as the soil types are comingled and would not support agricultural production except on the 2.98 acres. USDA – NRCS soil survey indicated Land Capability Classification for Section 3, T25N, R6W is 4E soils. The 4E soils consisting of 40.00 acres are currently utilized for grazing. These classes of soil are generally not suitable for small grain crop production. This tract would not meet current DNRC breaking criteria as the soil is very shallow and would not support small grain production. USDA – NRCS soil survey indicated Land Capability Classification for Section 11, T25N, R6W as a mixture of 4E-55% and 7E-45% soils. The 4E and 7E soils consisting of 80.00 acres are currently utilized for grazing. These classes of soil are generally not suitable for small grain crop production. This tract would not meet current DNRC breaking criteria as the soil types are comingled and would not support small grain production. *(If properly managed, soils in classes 1, 2, 3, 4 are suitable for the mechanized production of commonly grown field crops and for pasture and woodland. The degree of the soil limitations affecting the production of cultivated crops increases progressively from class 1 to class 5. The limitations can affect levels of production and the risk of permanent soil deterioration caused by erosion and other factors. Soils in classes 5, 6, 7 are generally not suitable for mechanized productions without special management. Capability subclasses indicate the dominant limitations in the class, E, shows that the main hazard is the risk of erosion unless a close growing plant cover is maintained. Capability subclasses indicate the dominant limitations in the class "S" shows that the soil is limited mainly because it is shallow, droughty, or stony. (From USDA-NRCS Soil Survey).*

Topography is rolling to steep slopes composed of native rangeland and a small portion of agricultural land. Soils are stable due to permanent vegetation cover being maintained upon the tracts. These tracts are surrounded by native rangeland contained in large pastures used for grazing and agricultural land used for small grain production. It is unlikely these tracts would be broke for agricultural production in the future as they have been historically used as grazing land and a small portion for agricultural land. The proposal does not involve any on the ground disturbance, so there are no soil effect differences between the alternatives. It is expected that this land will be used for livestock grazing and agricultural land in the future.

The State owns certain minerals under these parcels and would retain ownership of these mineral rights if the tracts are sold.

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**5. WATER QUALITY, QUANTITY AND DISTRIBUTION:**

*Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.*

There is a developed spring on the SE4NW4SE4, Section 2, T25N, R6W. The water right on this spring is used for livestock on the adjacent deeded and state land owned and leased by the lessee. No changes in use of the developed spring are expected in either alternative. Other water quality and/or quantity issue will not be impacted by the proposed action as no change in land use is expected.

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**6. AIR QUALITY:**

*What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.*

The proposal does not include any on-the-ground activities, or changes to activities. No effects to air quality would occur.

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**7. VEGETATION COVER, QUANTITY AND QUALITY:**

*What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.*

The acres proposed for sale consist of 197.02 acres of grazing land (native rangeland). Grazing land is typical of the Northern Mixed Grassed Prairie. Range sites are dominated by swallow, swallow to gravel, overflow, and thin hilly sites. Species composition is dominated by grasses which include western wheatgrass, green needle grass, needle and thread grass, thread leaf sedge, sandberg bluegrass and prairie junegrass. Sub-dominate species include various forbs and shrubs. Noxious weeds have not been identified according to previous inspections. Current range condition is poor on Section 2, T25N, R6W with a sacrifice area designation returning \$20.00 per acre. This area is used as a calving lot. Current range condition is poor on Section 3, T25N, R6W with an estimated carrying capacity or stocking rate assessed at 0.050 AUMs per acre. Current range condition is fair to good on Section 11, T25N, R6W with an estimated carrying capacity or stocking rate assessed at 0.200 AUMs per acre. There are an additional 2.98 acres of agricultural land that is located in Section 2, T25N, R6W. These acres are currently used for small grain production and are cash leased for \$30.00/acre.

Vegetation may be affected by numerous land management activities including livestock grazing, development, wildlife management, or other agricultural use. It is unknown what land use activities may be associated with a change in ownership; however the vegetation on these tracts are typical of land throughout the vicinity and there are no known rare, unique cover types or vegetation on these tracts. It is expected that this land will be used for grazing livestock in the future and for agricultural production. The nominating lessee has indicated that if they purchased these tracts, the land use would remain as grazing land and agricultural land. The proposal does not include any on-the-ground activities, or changes to activities and therefore we do not expect direct or cumulative effects would occur to vegetation as a result of the proposal.

A review of Natural Heritage data through the NRIS was conducted for T25N, R6W: There was one plant species of concern noted and no potential species of concern noted on the NRIS survey. Monocots-Wood Lily. Threatened or endangered species, sensitive habitat types, or other species of special concern or potential species of concern will not be impacted given the fact no management changes are expected from the sale of the tracts. Therefore, no direct, indirect, or cumulative effects are expected to this species of concern.

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**8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:**

*Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.*

The area is not considered critical wildlife habitat. However, these tracts provide habitat for a variety of big game species (mule deer, whitetail deer, and pronghorn antelope), predators (coyote, fox, and badger), upland game birds (sharp tail grouse and Hungarian partridge), other non-game mammals, raptors and various songbirds. The proposal does not include any land use change which would yield changes to the wildlife habitat. The proposed action will not impact wildlife forage, cover, or traveling corridors. Nor will this action change the juxtaposition of wildlife forage, water, or hiding and thermal cover.

The nominating lessees have indicated that if they purchased these tracts, the land use would remain as grazing lands and agricultural land. There are no unique or critical wildlife habitats associated with the state tracts and we do not expect direct or cumulative wildlife impacts would occur as a result of implementing the proposal. The proposed action will not have long-term negative effects on existing wildlife species and/or wildlife habitat because of its relatively small scale.

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**9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:**

*Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.*

A review of Natural Heritage data through the NRIS was conducted, as well as tract specific requests for wildlife concerns were made to the Montana FWP. Montana FWP did provide site specific comments regarding wildlife.

The tracts nominated for sale are located in the NCD grizzly bear recovery zone. This action is not expected to impact grizzly bears and/or grizzly bear habitat because no changes in land use is proposed. Other threatened or endangered species, sensitive habitat types, or other species of special concern or potential species of concern will not be impacted by proposal.

A review of Natural Heritage data through the NRIS was conducted for T25N, R6W. There were seven animal species of concern, zero potential species of concern, and one special status species noted on the NRIS survey: Mammals-Grizzly Bear. Birds-Great Blue Heron, Ferruginous Hawk, Black Tern, Horned Grebe, Bald Eagle, and McCown's Longspur. Fish-Northern Redbelly X Finescale Dace. These particular tracts do not contain many, if any of these species. Threatened or endangered species, sensitive habitat types, or other species of special concern or potential species of concern will not be impacted given the fact no management changes are expected from the sale of the tracts. Therefore, no direct, indirect, or cumulative effects are expected to these species of concern.

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**10. HISTORICAL AND ARCHAEOLOGICAL SITES:**

*Identify and determine effects to historical, archaeological or paleontological resources.*

A Class III cultural and paleontological resources inventory was conducted of the area of potential effect. Despite a detailed examination, no cultural or fossil resources were identified on the state tracts. No additional archaeological or paleontological investigative work is recommended. The proposed project will have *No Effect* to *Antiquities* as defined under the Montana State Antiquities Act. A formal report of findings is forthcoming and will be made available through the DNRC and the Montana State Historic Preservation Officer.

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**11. AESTHETICS:**

*Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.*

These tracts are located in a rural agricultural area. The state land does not provide any unique scenic qualities not also provided on adjacent private lands. The proposal does not include any on-the-ground activities, so there would be no change to the aesthetics in either alternative.

**12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:**

*Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.*

There are 5,208,760.46 acres of Trust land in Montana. There are 4,638,728.40 acres of Common Schools surface ownership and 185,615.46 acres of Capitol Buildings ownership in Montana, (TLMS).

There are approximately 22,076.37 acres of Capitol Buildings Trust in Teton County. There are approximately 41,647.22 acres of Capitol Buildings Trust in the Conrad Unit, (TLMS). This proposal includes 40.00 acres in Teton County, a small percentage of the state land within this County.

There are approximately 76,500.26 acres of Common Schools Trust in Teton County. There are approximately 306,137.06 acres of Common School Trust in the Conrad Unit, (TLMS). This proposal includes 160.00 acres in Teton County, a small percentage of the state land within this County.

The potential transfer of ownership will not have any impact or demands on environmental resources of land, water, air, or energy.

**13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:**

*List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.*

There are no other projects or plans being considered on the tract listed on this EA.

**IV. IMPACTS ON THE HUMAN POPULATION**

- RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.
- Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.
- Enter "NONE" if no impacts are identified or the resource is not present.

**14. HUMAN HEALTH AND SAFETY:**

*Identify any health and safety risks posed by the project.*

No impacts to human health and safety would occur as a result of the proposal.

**15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:**

*Identify how the project would add to or alter these activities.*

The tracts included in this proposal is leased by Miller Colony for grazing and agricultural land. Sale of the land to Miller Colony would add to their ranching and farming operations. Below is a table that indicates the State rated carrying capacity of the tracts being considered for sale.

Legal	Acres	Lease #	State rated carrying capacity
Section 2, T25N, R6W	80.00	3598	Sacrifice Area @ \$20.00/acre
Section 3, T25N, R6W	40.00	6430	2 AUM's
Section 11, T25N, R6W	80.00	3598	16 AUM's
Total	200.00		18 AUMs

This proposal does not include any specific changes to the agricultural activities. The nominating lessees indicated that grazing and agricultural operations would continue unchanged if they purchased this land.

No direct or cumulative impacts are anticipated as a result of the proposal.

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**16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:**

*Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.*

The proposal would have no effect on quantity and distribution of employment.

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**17. LOCAL AND STATE TAX BASE AND TAX REVENUES:**

*Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.*

State School Trust Lands are currently exempt from property tax. If State Trust Lands represent 6% or greater of the total acres within a county, a payment in lieu of taxes (PLT) is made to the counties to mitigate for the State Trust Land tax exempt status.

Counties will not realize an adjustment in the PLT payment as a result of an increase or decrease in State Trust Land acreage. If the parcels in this proposal were sold and use continued as grazing land, Teton County would receive an estimated \$128.97 in additional property tax revenues.

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**18. DEMAND FOR GOVERNMENT SERVICES:**

*Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services*

Being remote grazing and agricultural lands, no traffic changes would be anticipated. All state and private land are under the County Coop wildfire protection program. The proposed sale will not change fire protections in the area.

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**19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:**

*List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.*

These tracts are surrounded by private or state land. There are no zoning or other agency management plans affecting this land.

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**20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:**

*Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.*

The proposed tracts are not legally accessible which limits the current and future recreational activities. The area contains no wilderness areas. The tracts are in close proximity to the Miller Colony's cattle facility, which further limits recreational opportunities. Selling the parcels will not change the access or management of the remaining state land in the area. The sale of this tract is not expected to have any cumulative effects on recreational or wilderness activities and collectively offers very little recreational value.

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**21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:**

*Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing*

The proposal does not include any changes to housing or developments. The nominating lessee has indicated that the land would continue as grazing and agricultural land, if they purchase them at auction. No effects are anticipated.

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**22. SOCIAL STRUCTURES AND MORES:**

*Identify potential disruption of native or traditional lifestyles or communities.*

There are no native, unique or traditional lifestyles or communities in the vicinity that would be impacted by the proposal.

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**23. CULTURAL UNIQUENESS AND DIVERSITY:**

*How would the action affect any unique quality of the area?*

The State Trust land in this proposal is currently managed for grazing and agricultural land. The State land is generally indistinguishable from the adjacent private lands, with no unique quality.

The potential sale of the state land would not directly or cumulatively impact cultural uniqueness or diversity. It is unknown what management activities would take place on the lands if ownership was transferred. The tracts were nominated by the lessee with the intent of purchasing and continuing use as grazing and agricultural land.

**24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:**

*Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur as a result of the proposed action.*

Legal	Acres	2018 Lease Income	Income per acre
Section 2, T25N, R6W	72.02	\$1,440.40	\$20.00
Section 2, T25N, R6W	5.00	\$500.00	\$100.00
Section 2, T25N, R6W	2.98	\$89.40	\$30.00
Section 3, T25N, R6W	40.00	\$22.06	\$0.55
Section 11, T25N, R6W	80.00	\$176.48	\$2.21

The statewide stocking rate for grazing land on 4.1 million acres averages 0.24 AUMs per acre or a total of 962,000 AUMs (2017 DNRC Annual Report). 2017 statewide grazing land gross revenue was \$14,174,423.00 or (\$14.01 per AUM) on 4.1 million grazing acres for an average income of \$3.46 per acre. The tracts of grazing land nominated for sale are lower than the average statewide stocking rate and have a lower than average income for grazing land at an average of \$1.65 per acre. The 80 acre sacrifice area and ag building site have a higher than average return to the trust, but has long term management difficulties for DNRC. Although there are 2.98 acres of agricultural land, which produce favorable income to the trust (\$30.00 per acre), fields are small, awkward and difficult to manage. The tracts proposed to sell are small and isolated which creates management problems for the state and is generally not efficient to administer. In addition, these tracts are essential for Miller Colony's ranching and farming business.

From 2006-2017, 1,519.00 acres in Teton County have been sold through the land banking process. This resulted in a total sale value of \$1,470,000.00 or \$967.74 per acre in Teton County.

An appraisal of the property value has not been completed to date. Under DNRC rules, an appraisal would be conducted if preliminary approval to proceed is granted by the Board of Land Commissioners. The Department is conducting more detailed evaluations at this time in order to make a determination on whether to offer the tracts for sale. The revenue generated from the sale of these parcels would be combined with other revenue in the Land Banking Account to purchase replacement property for the benefit of the Trust. It is anticipated the replacement property would have legal access and be adjacent to other Trust lands which would provide greater management opportunities and income. If replacement property was not purchased prior to the expiration of the statute, the revenue would be deposited into the permanent trust for investment.

Two public comments were received from the extensive scoping list, published public notice, or the general public at large. Copies of the public comments are in Appendix D. The first comment was from Montana FWP in which the local biologist supported the proposed sale. The second comment was received from the Confederated Salish and Kootenai Tribes - Tribal Historic Preservation Officer. The comment pertained to cultural resources impacts from the proposed action and the future notification of any site development. A Class III cultural and paleontological resources inventory was conducted of the area of potential effect. Despite a detailed examination, no cultural or fossil resources were identified on the state tracts.

<b>EA Checklist Prepared By:</b>	<b>Name:</b> Tony Nickol	<b>Date:</b> March 14, 2018
	<b>Title:</b> Land Use Specialist, Conrad Unit, Central Land Office	

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**V. FINDING**

**25. ALTERNATIVE SELECTED:**

Alternative B (the Proposed action) – Under this alternative, the Department would request and recommend approval by the Land Board to sell the 200.00 acres of state land currently held in trust for the benefit of Capitol Buildings and Common Schools. If approved by the Board, the sale would be at public auction, subject to the requirements found in Title 77, Chapter 2, Part 3 of the Montana Codes Annotated. The income from the sale would be pooled with other land sale receipts from across the State to fund the purchase of other state land, easements, or improvements for the beneficiaries of the respective trusts

**26. SIGNIFICANCE OF POTENTIAL IMPACTS:**


I have evaluated the potential social, economic, and environment effects and have determined significant impacts would not result from the proposed 200 acre land sale. These parcels do not have any unique characteristics, critical habitat or environmental conditions indicating the tract should remain under DRNC ownership and management. The nominating lessee has indicated that no changes in land use will occur as a result of the purchase and the property will be managed as grazing land into the future. There are no indications the tracts would produce substantially greater revenue or have substantially greater value to the trust in the future. Although, the sacrifice area parcel has higher economic returns, as compared to the state wide average for grazing land, continued management problems are expected for the DNRC because of the association with barns, sheds and calving facilities. It is in the best interest of the trust beneficiaries to sell these tracts.

**27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:**

EIS

More Detailed EA

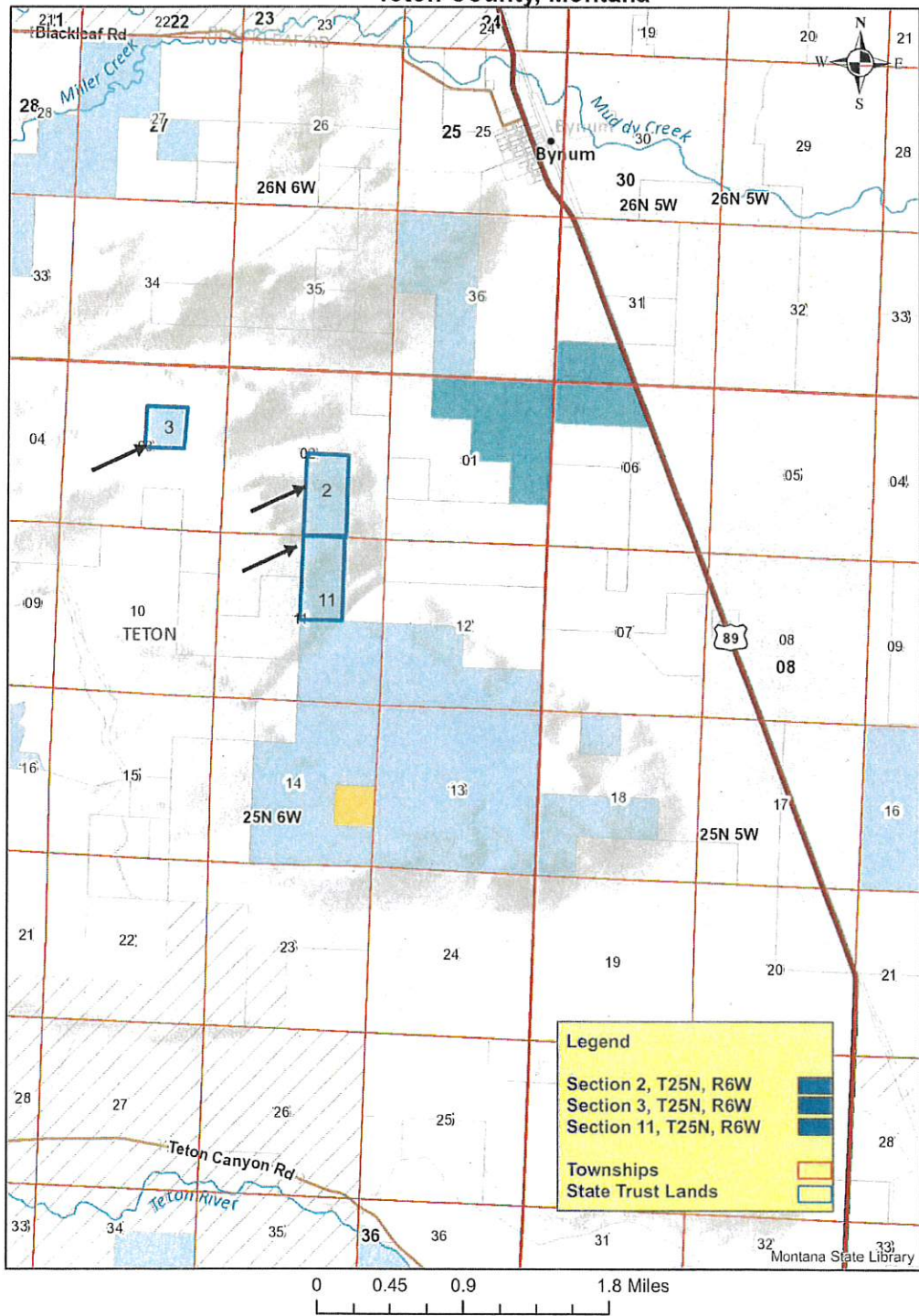
No Further Analysis

<b>EA Checklist Approved By:</b>	<b>Name:</b> Erik Eneboe <b>Title:</b> Conrad Unit Manager, Central Land Office
<b>Signature:</b> 	<b>Date:</b> October 23, 2018



Appendix A

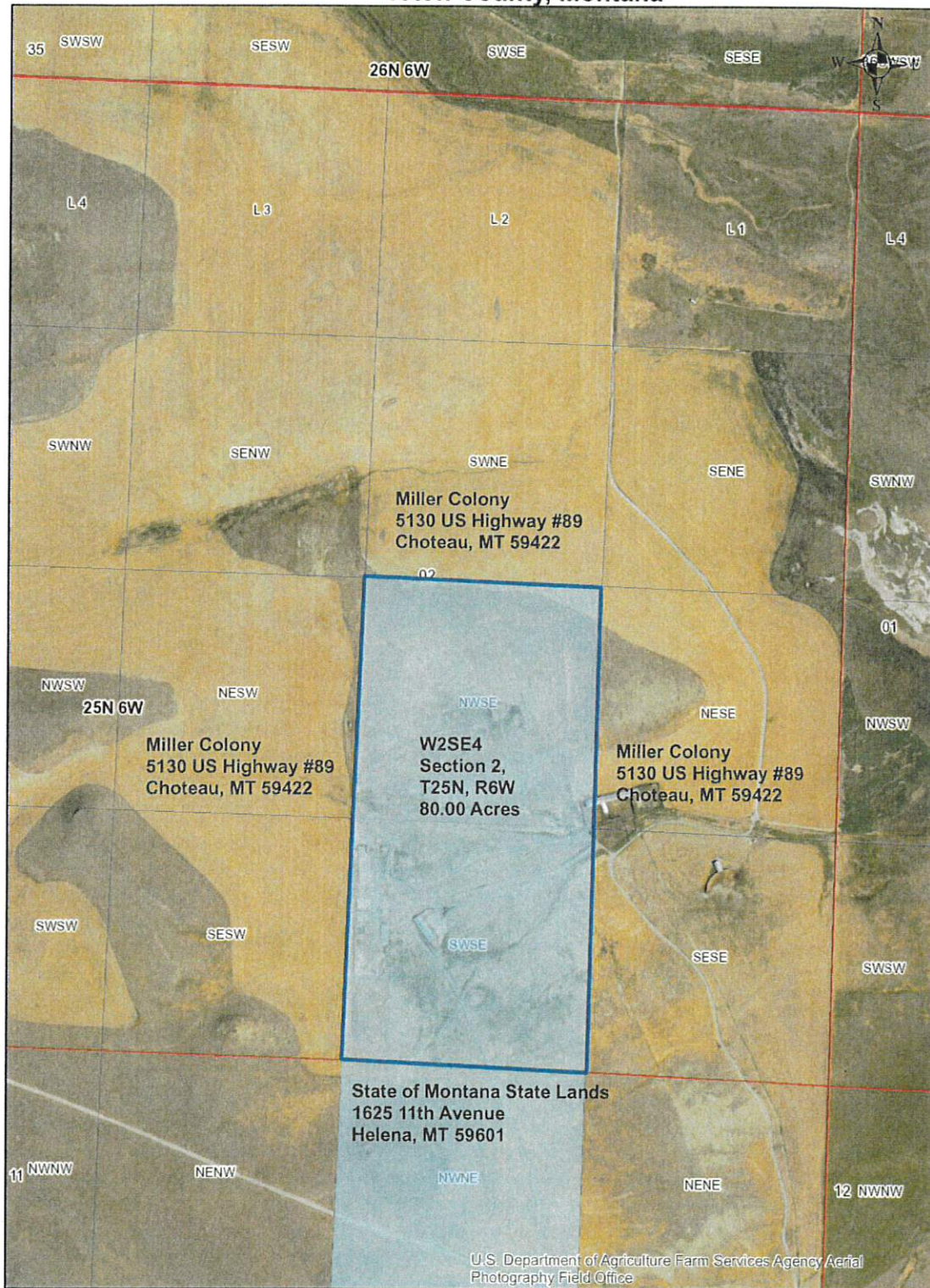
Land Banking Priorities  
Teton County, Montana



# Appendix B Teton County, Montana



# Appendix B Teton County, Montana



**Appendix B  
Teton County, Montana**



Appendix C.

<p>Montana Environmental Info. Center                  Attn: Anne Hedges                  PO Box 1184                  Helena, MT 59624</p>	<p>Matador Cattle Company                  Attn: Kyle Hardin                  9500 Blacktail Road                  Dillon, MT 59725</p>	<p>Dept. of Fish, Wildlife, and Parks                  Attn: Darlene Edge                  PO Box 200701                  Helena, MT 59620-0701</p>
<p>Montana Wildlife Federation                  Attn: Dave Chadwick                  PO Box 1175                  Helena, MT 59624</p>	<p>University of Montana                  Attn: Lucy France                  32 Campus Drive                  Missoula, MT 59812-0001</p>	<p>Dept. of Environmental Quality                  Attn: George Mathieus                  PO Box 200901                  Helena, MT 59620-0901</p>
<p>Montana School Boards Association                  Attn: Bob Vogel                  863 Great Northern Blvd. Ste 301                  Helena, MT 59601-3398</p>	<p>Office of Public Instruction                  Attn: Elsie Arntzen, Superintendent                  Box 202501                  Helena, MT 59620-2501</p>	<p>Dept. of Transportation                  Attn: Carla Haas                  PO Box 201001                  Helena, MT 59620-1001</p>
<p>Montana Grain Growers Association                  Attn: Lola Raska                  PO Box 1165                  Great Falls, MT 59403</p>	<p>School for Deaf and Blind                  Attn: Donna Sorensen, Superintendent                  3911 Central Avenue                  Great Falls, MT 59405</p>	<p>Teton County Commissioners                  PO Box 610                  Choteau, MT 59422</p>
<p>Montana Wood Products                  Attn: Julia Altermus                  PO Box 1967                  Missoula, MT 59806</p>	<p>Montana Tech                  Attn: Don Blackketter, Chancellor                  1300 W Park Street                  Butte, MT 59701</p>	<p>Liberty County Commissioners                  PO Box 459                  Chester, MT 59522</p>
<p>Montana Association of Counties                  Attn: Harold Blattie                  2715 Skyway Dr.                  Helena, MT 59601</p>	<p>University of Montana-Western                  Attn: Charles Raffey, Chancellor                  710 South Atlantic                  Dillon, MT 59725</p>	<p>House District 18                  Rob Cook                  720 1<sup>st</sup> Street South                  Shelby, MT 59474</p>
<p>Jack Atcheson, Sr.                  3210 Ottawa                  Butte, MT 59701</p>	<p>Montana State University-Billings                  Attn: Dr. Ron Larsen, Chancellor                  1500 N 30<sup>th</sup> Street                  Billings, MT 59101</p>	<p>Senate District 9                  Llew Jones                  1102 4<sup>th</sup> Avenue SW                  Conrad, Mt 59425</p>
<p>Montana Audubon                  Attn: Janet Ellis                  PO Box 595                  Helena, MT 59624</p>	<p>Office of Budget and Program Planning                  Attn: Budget Director                  PO Box 200802                  Helena, MT 59620-0802</p>	<p>House District 17                  Ross Fitzgerald                  451 1<sup>st</sup> Road NE                  Fairfield, MT 59436</p>
<p>MSU Bozeman                  Attn: Kellie Peterson, Legal Counsel                  PO Box 172440                  Bozeman, MT 59717-0001</p>	<p>Veterans' Home Trust Beneficiary                  Attn: Sheila Hogan, Director DPHHS                  PO Box 4210                  Helena, MT 59620-4210</p>	<p>House District 27                  James O'Hara                  5254 Frenchman Ridge Road                  Fort Benton, Mt 59442-8817</p>
<p>MT Farm Bureau Federation                  Attn: Jake Cummins                  502 19<sup>th</sup>, Suite 104                  Bozeman, MT 59718</p>	<p>Department of Corrections                  Attn: Reginald Michael, Director                  PO Box 201301                  Helena, MT 59620-1301</p>	<p>Senate District 14                  Russel Tempel                  1839 1200 Road South                  Chester, MT 59522</p>

<p>Mark and Richard Wickum PO Box 491 Chester, MT 59522</p>	<p>Montana Association of Land Trust Attn: Glen Marx, Executive Director PO Box 892 Helena, MT 59624</p>	
<p>Errol Fritz 1465 Whitlash Road Chester, MT 59522</p>	<p>The Blackfeet Nation Attn: John Murray, THPO Quarter 108, East Gov. Square Box 2809 Browning, MT 59417</p>	
<p>Miller Colony 5130 US Highway #89 Choteau, MT 59422</p>	<p>Chippewa Cree Tribe of Rocky Boy's Reservation Attn: Alvin Windy Boy, THPO RR 1 #544 Box Elder, MT 59521</p>	
<p>Lazy T3 Red Angus Inc. 1465 Whitlash Road Chester, MT 59522</p>	<p>Confederated Salish and Kootenai Tribes of the Flathead Reservation Attn: Kyle Felsman, THPO PO Box 278 Pablo, MT 59855</p>	
<p>Dept. of Fish, Wildlife, and Parks Attn: Brent Lonner PO Box 488 Fairfield, MT 59436</p>	<p>The Crow Tribe of Indians Attn: William Big Day, THPO PO Box 159 Crow Agency, MT 59022</p>	
<p>Dept. of Fish, Wildlife, and Parks Attn: Ryan Rauscher 514 Front Street Conrad, MT 59425</p>		
<p>Daniel Berube 27 Cedar Lake Drive Butte, MT 59701</p>		
<p>The Nature Conservancy 32 South Ewing Helena, MT 59601</p>		
<p>Montana Stockgrowers 420 N California Helena, MT 59601</p>		
<p>Montana Wildlife Federation Attn: Craig Sharpe and Larry Copenhaver PO Box 1175 Helena, MT 59624</p>		

Appendix D  
Public Comments

## Eneboe, Erik

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**From:** Kyle Felsman <Kyle.Felsman@cskt.org>  
**Sent:** Thursday, May 3, 2018 1:44 PM  
**To:** Eneboe, Erik  
**Subject:** MEPA/Land Banking

Hello Mr. Eneboe

Thank you for contacting the CSKT Preservation Department regarding the proposed Land Banking activates. My comments will only be pertinent to the cultural resource aspect of any future work. Depending on what becomes of any land banking transfers, we would want to be notified of any possible development on both newly acquired or currently owned land. Notification of any future projects within these lands would be essential for us to review for any possible cultural resource impacts. Thank you again for contacting us.

Sincerely,

**Kyle Felsman**

**Tribal Historic Preservation Officer**

Confederated Salish and Kootenai Tribes

Work: (406) 675-2700 Ext. 1108

Cell: (406) 546-2339

[kyle.felsman@cskt.org](mailto:kyle.felsman@cskt.org)

P.O. Box 278

Pablo, MT 59855





# Montana Fish, Wildlife & Parks

May 8, 2018

Erik Eneboe  
DNRC – Conrad Unit Office  
PO Box 961  
Conrad, MT 59425

Dear Erik,

In reviewing the proposed land banking sale referenced in your letter of April 18, 2018, I provide the following comments:

First, I applaud the DNRC Land Banking Program for seeking tracts of land to sell and/or purchase to block up state lands with public access in other areas. The DNRC Land Banking Program benefits the recreating public by selling/trading these inaccessible parcels and in return purchasing/trading for parcels that do have public access. The parcels mentioned in your letter are excellent candidates to sell due to being 100% inaccessible to the public and having limited management opportunities for DNRC. That being said, some of the parcels do appear to have good wildlife habitat for mule deer, white-tailed deer, pronghorn antelope as well as grassland birds, nongame, and furbearers. However, these parcels have no road access, nor reasonable opportunity for future road access due to the rough topography and remoteness, so neither breaking nor subdivision appear to be a major threat to important wildlife habitat. Further, one of the parcels is a livestock complex with limited wildlife habitat or recreational opportunity.

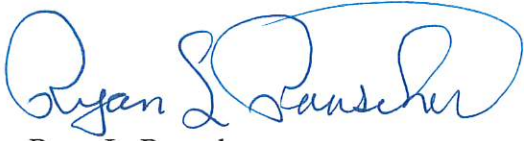
For the above reasons, I encourage DNRC to continue the proposed land banking sale of the following parcels:

County	Section	T	R	Acres
Teton	3	25N	6W	40
Teton	2	25N	6W	80
Teton	11	25N	6W	80
Liberty	4	35N	4E	80
Liberty	9	35N	4E	120

In closing, I would like to see DNRC continue the process in selling parcels without public access to later purchase parcels with public access.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Ryan L. Rauscher". The signature is fluid and cursive, with the first name "Ryan" and last name "Rauscher" clearly legible.

Ryan L. Rauscher  
Wildlife Biologist  
Montana Fish, Wildlife & Parks  
514 South Front Street, Suite C  
Conrad, MT 59425  
(406) 271-7033  
[rrauscher@mt.gov](mailto:rrauscher@mt.gov)