CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	2013 Land Banking – Conrad Unit – CLO – Sunrise Properties Inc.
Proposed Implementation Date:	2013
Proponent:	This tract was nominated by the lessees, Sunrise Properties Inc., and brought forward now by DNRC.
Location:	W2NW4NW4, Section 16, T28N, R2W, 20.00 acres, Pondera County Total Acres: 20.00
County:	Pondera County
Trust:	Common Schools

I. TYPE AND PURPOSE OF ACTION

Offered for Sale at Public Auction are 20.00 acres of state land currently held in trust for the benefit of 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 60,302.00 acres and purchased 64,222.00 acres.

Two maps are attached to this EA checklist: 1. Labeled “Land Banking Priorities- Pondera County” is a general map of all state land within the county (blue) and those parcels of land considered for sale under land banking (red). 2. Labeled “Appendix B” is a satellite imagery map that indicates the tract 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 Independent Observer on 03/21/20130 and 03/28/2013, and in the Shelby Promoter 04/24/2013 and 05/01/2013.
- 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.

- Follow-up contacts were made by phone, mail, or email with parties requesting additional information. These are also included in Appendix C.

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

No other governmental agencies have jurisdiction over this proposal.

3. ALTERNATIVES CONSIDERED:

Alternative A (No Action) – Under this alternative, the State retains the existing land ownership pattern and would not sell the 20.00 acres of Common School Trust Land contained in Section 16, T28N, R2W.

Alternative B (the Proposed action) – Under this alternative, the Department would request and recommend approval by the Land Board to sell the proposed tract located in Section 16, T28N, R2W. 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.)*

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *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.*

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 16, T28N, R2W as a mixture of 3E-75%, and 4E-25% soils. The 3E and 4E soils consisting of 20.00 acres are currently utilized for a homesite (7.90 acres), tame pasture (5.60 acres), and native rangeland (6.50 acres). These soils meet DNRC's breaking criteria, but do to the small size of the fields and proximity to Pondera Coulee, it would be recommended that the proposed sale area remaining as a homesite and grazing land. *("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." From USDA-NRCS Soil Survey).*

Topography is gently rolling composed of a homesite, tame pasture, and native rangeland. Soils are stable due to permanent vegetation cover being maintained upon the tract. This tract is surrounded by irrigated agricultural land, tame pasture, and native rangeland. It is unlikely this tract would be broke for agricultural production in the future as it has been historically used as a homesite and grazing 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 a homesite and livestock grazing in the future.

The State owns certain minerals under this parcel and would retain ownership of these mineral rights if the tract is sold.

Monte G. Mason, Minerals Management Bureau Chief, DNRC commented, “No mineral issues or concerns. Oil and gas is the only mineral type with any commercial potential in this area. T28N, R2W, Section 20. Old oil and gas activity and production in the broader area, including the Brady Field 3 miles to the south. However, there are a number of dry holes between the Brady Field and Section 16, confirming that the field does not extend northward to Section 20.”

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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.

An unnamed tributary of Pondera Coulee, an ephemeral drainage, runs though Section 16, T28N, R2W. If sold, any water rights associated with this parcel would be transferred to the purchaser. All irrigation shares in the Pondera County Canal and Reservoir Company will be kept on adjacent state land. Other water quality and/or quantity issue will not be impacted by the proposed action.

legal	Water right no.	purpose	Source	Priority date
Section 16, T28N, R2W	41P-2601400	Stock water	Unnamed Tributary of Pondera Coulee	04/15/1954

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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 a homesite-7.90 acres, tame pasture-5.60 acres, and native rangeland 6.50 acres. The tame pasture species composition consists of primarily smooth brome and timothy. The native rangeland is typical of the Northern Mixed Grassed Prairie. Range sites are dominated by clayey and overflow sites. Species composition is dominated by grasses which include western wheatgrass, green needle grass, needle and thread grass, blue grama, thread leaf sedge, sandberg bluegrass and prairie junegrass. Sub-dominate species include various forbs and shrubs. Current range condition is fair to good on Section 16, T28N, R2W with an estimated carrying capacity or stocking rate assessed at 3.0 AUMs per acre on the tame pasture and 0.285 AUMs per acre on the native rangeland.

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 this tract is typical of land throughout the vicinity and there are no known rare, unique cover types or vegetation on the tract. It is expected that this land will be used for a homesite and grazing livestock in the future. The nominating lessee has indicated that if they purchased this tract, the land use would remain as a home site and grazing 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 T28N, R2W: There were no plant species of concern noted or potential species of concern noted on the NRIS survey.

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, this tract provides 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 this tract, the land use would remain as a homesite and grazing land. There are no unique or critical wildlife habitats associated with the state tract 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 affects on existing wildlife species and/or wildlife habitat because of its relatively small scale.

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, see item #20 and attached letter.

A review of Natural Heritage data through the NRIS was conducted for T28N, R2W. There were zero animal species of concern, two potential species of concern, and zero special status species noted on the NRIS survey: Fish-Brook Stickleback and Brassy Minnow. This particular tract of land does 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 tract. Therefore, no direct, indirect, or cumulative effects are expected to these species of concern.

There are no threatened or endangered species, sensitive habitat types, or other species of special concern associated with the proposed land sale.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:
Identify and determine effects to historical, archaeological or paleontological resources.

The state parcel was inventoried to Class I standards for cultural and paleontological resources in April of 2013. No such phenomena were identified. The parcel consists of fully disturbed land that contains a personal residence and associated outbuildings. Sale of the tract will have No Effect to Heritage Properties.

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.

This tract is 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 5,149,164 acres of Trust land and 4,621,923 acres of Common Schools surface ownership in Montana, *(TLMD, 2012 Annual Report)*. There are approximately 56,600.22 acres of Common Schools Trust in Pondera County and 304,635.03 acres of Common Schools Trust in the Conrad Unit, *(TLMS).* This proposal includes 20.00 acres in Pondera County, a small percentage of the state land within this County.

There are additional tracts of state land currently under consideration for sale through the Land Banking Program. An additional 304.48 acres of state trust land in Pondera County and an additional 264.29 acres of state trust land in the Conrad Unit are being evaluated under separate analysis. Cumulatively, these lands considered for sale represent 0.57% of the state trust land surface ownership in Pondera County and 0.17% of the state trust land in Conrad Unit surface ownership.

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.

There are 4 tracts containing 304.48 acres in Pondera County and 3 tracts containing 264.29 acres in Toole County proposed for sale under the Land Banking Program and are being evaluated under separate review.

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 tract included in this proposal is leased by Sunrise Properties Inc. for a homesite and for grazing. Sale of the land to Sunrise Properties Inc. would add to their ranching operations. Below is a table that indicates the State rated carrying capacity of the tract being considered for sale.

Legal	Acres	Lease #	State rated carrying capacity
Section 16, T28N, R2W	12.10	5224	19 AUM's
Total	12.10		19 AUMs

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

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

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 affect on quantity and distribution of employment.

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 parcel in this proposal was sold and use continued as a homesite and grazing land, Pondera County would receive an estimated $40.80 in additional property tax revenues.

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 a remote homesite and grazing land, 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.

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.

This tract is surrounded by state and private land. There are no zoning or other agency management plans affecting this land.

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.

Montana FWP commented on Section 16, T28N, R2W. “Some of 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, many of the 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. Two of the parcels are home sites. While there may be public access, limited recreational opportunity exists with these parcels. For the above reasons, I encourage DNRC to continue the proposed land banking sale of the following parcels:” commented Ryan Rauscher, Wildlife Biologist-FWP, see attached letter.

Although this particular tract is legally accessible, the overall recreational values are low because the site is encumbered by a homesite. The sale of this tract is not expected to have any cumulative effects on recreational or wilderness activities.

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 a homesite and grazing land, if they purchase it at auction. No effects are anticipated.

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.

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 a homesite and grazing. 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 land if ownership was transferred. The tract was nominated by the lessee with the intent of purchasing and continuing use as a homesite and grazing 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	2013 Lease Income	Income per acre
Section 16, T28N, R2W	7.90	$870.00	$110.13
Section 16, T28N, R2W	12.10	$188.86	$15.61

The statewide stocking rate for grazing land on 4.1 million acres averages 0.24 AUMs per acre or a total of 990,000 AUMs (2012 DNRC Annual Report). 2012 statewide grazing land gross revenue was $8,262,292.00 or ($7.90 per AUM) on 4.1 million grazing acres for an average income of $2.02 per acre (2012 DNRC Annual Report). The tract nominated for sale is higher than the average statewide stocking rate 3.00 AUMs/ac for tame pasture and 0.285 AUMs/ac for native rangeland and income for grazing land $15.61/acre. The 7.9 acre homesite lease income is $870.00 per year, which is below the state wide average. In general, homesite leases have high management costs and difficult for DNRC to manage in the long term.

From 2006-2012, 426.00 acres in Pondera County have been sold through the land banking process. This resulted in a total sale value of $108,200.00 or $253.99 per acre in Pondera 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.

EA Checklist Prepared By:	**Name:** Tony Nickol	**Date:** May 20, 2013
	Title: Land Use Specialist, Conrad Unit, Central Land Office	

V. FINDING

25. ALTERNATIVE SELECTED:

Proposed Alternative B, recommend the tract receive preliminary approval for sale and continue with the Land Banking process.

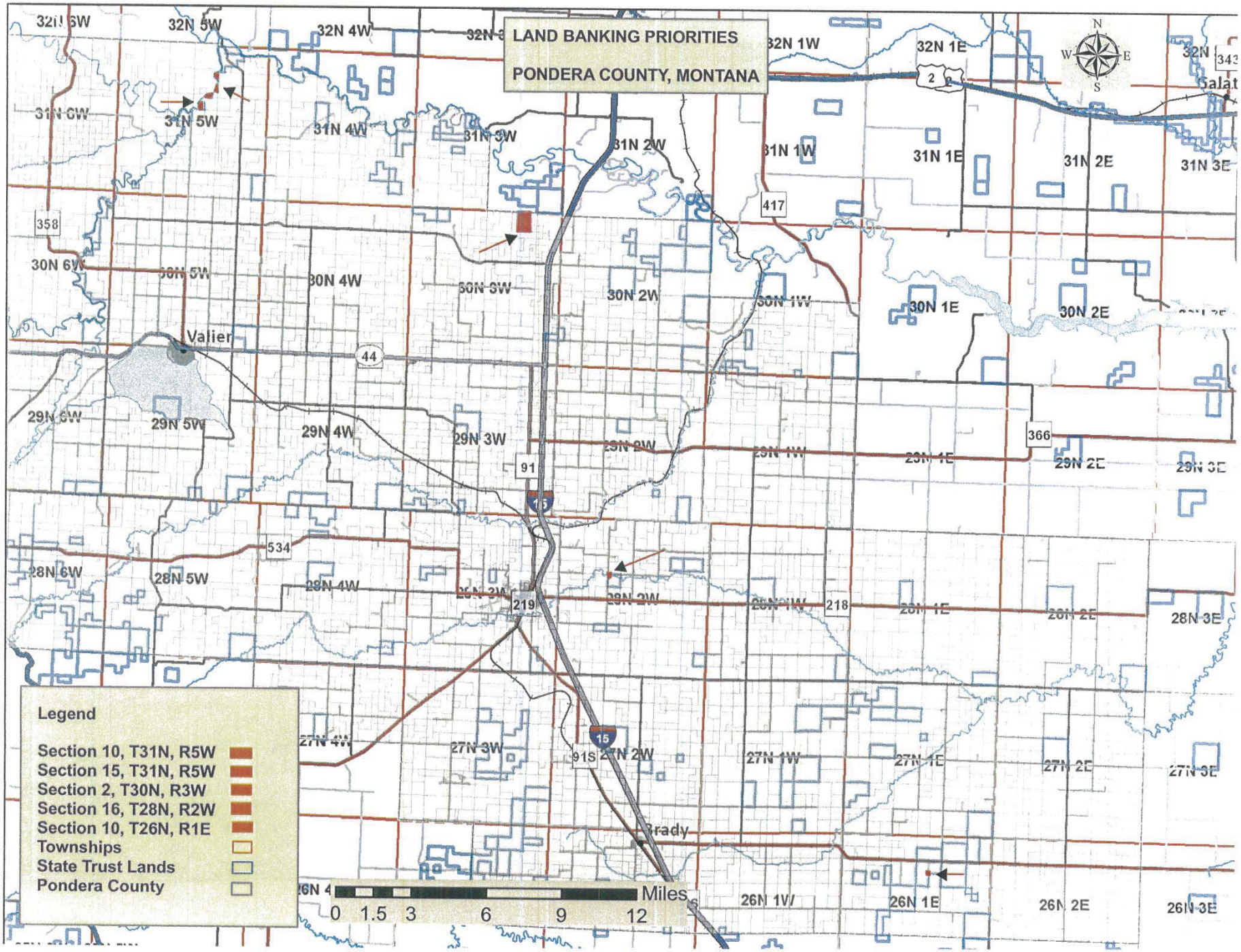
26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I have evaluated the potential environment affects and have determined significant environmental effects would not result from the proposed land sale. The intensive scoping process resulted in one comment from Montana FWP, which tendered support for the proposed sale. No negative comments were received from the general public. This small 20 acre parcel does not have any unique characteristics, critical habitat or environmental conditions indicating the tract should necessarily remain under management by the Department of Natural Resources and Conservation. There is no indication that the tract would produce substantially greater revenue or have substantially greater value to the trust in the near future. DNRC homesite leases are becoming increasingly controversial and difficult to manage in the long term.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

EA Checklist Approved By:	**Name:**	Erik Eneboe
	Title:	Conrad Unit Manager, Central Land Office
Signature:		**Date**: 5/21/2013



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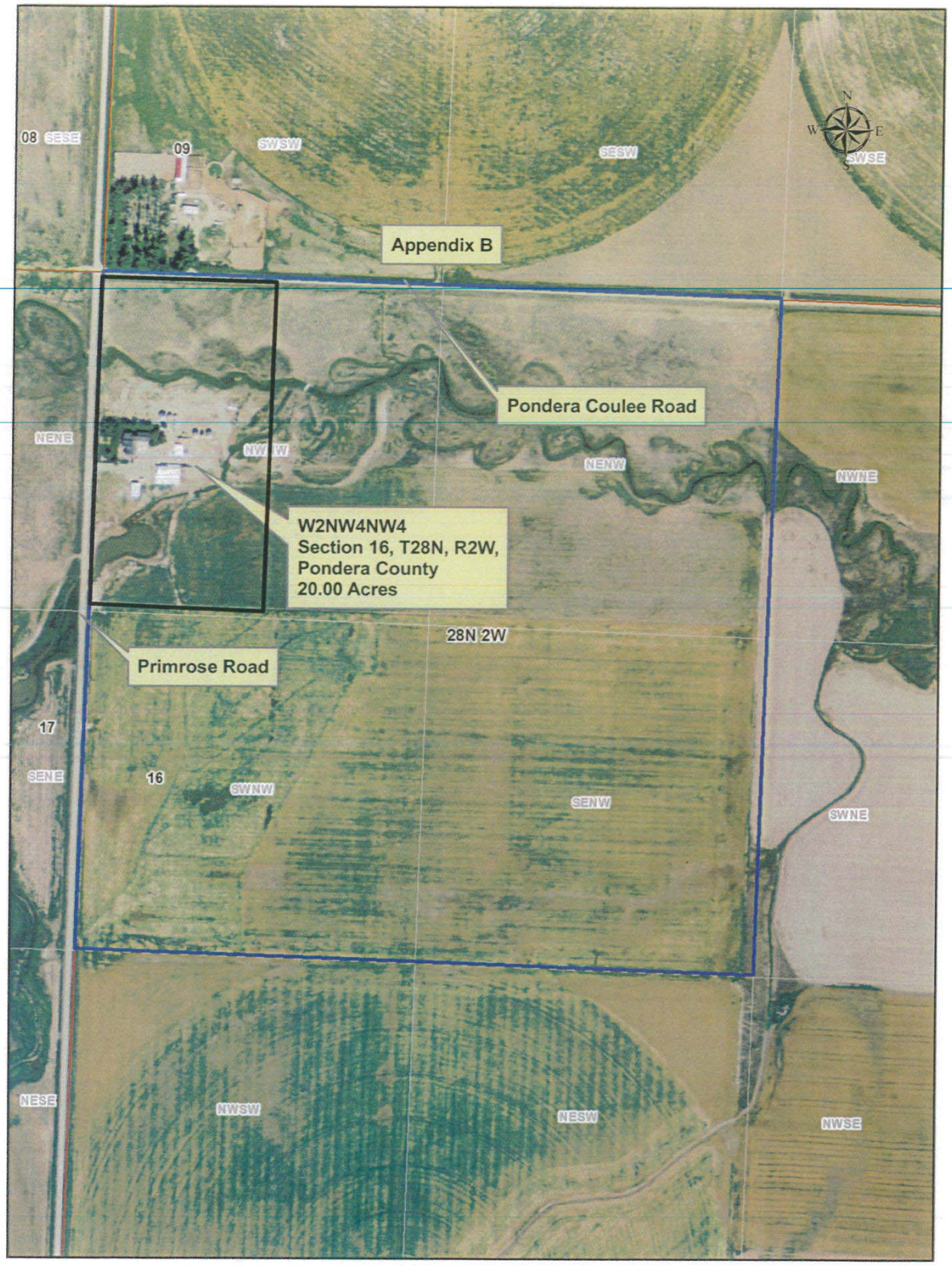
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Appendix B
Pondera Coulee Road
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NWNE
W2NW4NW4
Section 16, T28N, R2W,
Pondera County
20.00 Acres
28N 2W
Primrose Road
17
SENE
16
SWNW
SENW
SWNE
NESE
NWSW
NESW
NWSE

APPENDIX C

Anne Hedges
Montana Environmental Information Center
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MT Department of Environment Quality
Attn: Bonnie Lovelace
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Montana Stockgrowers
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MT Farm Bureau Federation
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Montana Association of Land Trust
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Whitehall, MT 59759

Toole County Commissioners
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Curtis Stene
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Kevin MT 59454

Marvin & Brenda Fretheim
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Lawrence Bye
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Kevin MT 59454

Duane VanDyke
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Leona M Elings Life Estate
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Office of Public Instruction
Denise Juneau, Superientendent
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Office of Budget & Program Planning
Budget Director
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Wayne & Kathleen Dean
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Valier MT 59486

Ken Wheeler
952 Beaverhead Road
Valier MT 59486

Monroe Brothers Partnership
4036 Swanson Road
Valier MT 59486

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Montana Fish, Wildlife & Parks

April 8, 2013

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 March 15, 2013, 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 DRNC 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. Some of 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, many of the 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. Two of the parcels are home sites. While there may be public access, limited recreational opportunity exists with these parcels.

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

County	Section	T	R	Acres
Pondera	10	31N	5W	25.3
Pondera	15	31N	5W	27.85
Pondera	10	26N	1E	10
Pondera	16	28N	2W	20

Some of the parcels proposed for land banking sale described in your letter have high wildlife values, provide recreational opportunity, and/or are legally accessible. I recommend DNRC remove the following parcels from the proposed land banking sale:

County	Section	T	R	Acres
Pondera	2	30N	3W	241.33

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The above parcel, while lacking public access, is native prairie and is significantly large enough to provide important habitat for mule deer, white-tailed deer, pronghorn antelope, nongame wildlife, and especially grassland birds. In this part of Pondera County, level native prairie preferred by many grassland birds including Sprague's pipits, a Candidate Species under the Endangered Species Act, and other Species of Concern such as long-billed curlews, and chestnut-collared longspurs, is scarce and therefore particularly important for the conservation of these species. Adjacent ridge tops are currently farmed or have been cultivated in the past. Therefore, I believe the threat of breaking this parcel of native prairie is real and sufficient enough to recommend removing it from the proposed land banking sale.

County	Section	T	R	Acres
Toole	30	35N	3W	148
Toole	25	35N	4W	40
Toole	6	34N	3W	76.29

The above parcels all have public access and therefore do not meet the criteria for land bank sale as described in your letter. Further, these parcels provide ample recreational opportunity, including hunting, wildlife viewing, and trapping. Therefore, it is my recommendation that these parcels be withdrawn from the proposed land banking sale.

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,

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