

CHECKLIST ENVIRONMENTAL ASSESSMENT

| | | | | | | | |
|--------------------------------------|--|----|----|--|---------------|----|----------------|
| Project Name: | 2015 Land Banking: Sun River WMA – Helena Unit – CLO – FWP | | | | | | |
| Proposed Implementation Date: | 2015 | | | | | | |
| Proponent: | The Montana Department of Natural Resources and Conservation (DNRC) at the request of Montana Department of Fish, Wildlife and Parks | | | | | | |
| Location: | | | | | | | |
| | 21N | 8W | 8 | SW4NW4 | Lewis & Clark | CS | 40 |
| | 21N | 8W | 9 | NE4NE4 | Lewis & Clark | CS | 40 |
| | 21N | 8W | 11 | E2NW4, NE4SW4, NW4SE4, SE4SE4 | Lewis & Clark | CS | 200 |
| | 21N | 8W | 12 | S2SW4, NW4SW4 | Lewis & Clark | CS | 120 |
| | 21N | 8W | 14 | NE4NE4, SW4NE4, SE4NW4, N2SE4, SE4SE4 | Lewis & Clark | CS | 240 |
| | 21N | 8W | 2 | E2SW4 | Lewis & Clark | CS | 79.73 |
| | 21N | 8W | 23 | S2 | Lewis & Clark | CS | 320 |
| | 21N | 8W | 35 | N2NE4 | Lewis & Clark | CS | 80 |
| | 21N | 8W | 36 | 5.00 ACRES IN GOVERNMENT LOT 7 (SE4SE4) | Lewis & Clark | CS | 5 |
| | 21N | 8W | 36 | LOTS 1 TO 7 INC.,NW4SE4,N2SW4,W2NE4,NW4, LESS 5 AC SPECIAL LEASE IN LOT 7 (SE4SE4) | Lewis & Clark | CS | 645.62 |
| | 21N | 8W | 10 | SW4NW4 | Lewis & Clark | CS | 40 |
| | 21N | 8W | 13 | NW4NW4_NW4SW4_S2SW4 | Lewis & Clark | CS | 160 |
| | 21N | 8W | 15 | S2SW4 | Lewis & Clark | CS | 80 |
| | 21N | 8W | 16 | ALL | Lewis & Clark | CS | 640 |
| | 21N | 8W | 17 | SE4NW4_W2SE4_NE4SW4 | Lewis & Clark | CS | 160 |
| | 21N | 8W | 21 | NE4NW4_NE4 | Lewis & Clark | CS | 200 |
| | 21N | 8W | 22 | NE4NW4_W2NE4 | Lewis & Clark | CS | 120 |
| | 21N | 8W | 26 | E2E2_SW4SE4_SE4SW4 | Lewis & Clark | CS | 240 |
| | | | | Total Acres | | | 3410.35 |
| County: | Lewis and Clark County | | | | | | |
| Trust: | Commons Schools (CS) | | | | | | |

I. TYPE AND PURPOSE OF ACTION

The Department of Natural Resources and Conservation (DNRC) will consider offering for Sale at Public Auction 3,410.35 acres of state land in Lewis and Clark County within the Sun River Wildlife Management Area (WMA). These lands are 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 66,180.00 acres and purchased 64,629.00 acres.

Exhibits attached to this EA checklist:

- 1.) **Exhibit A-Sun River WMA Land Banking Vicinity Map:** a general map of the vicinity of this Land Banking Sale
- 2.) **Exhibit B- Sun River WMA/Nominated Trust Land Tracts:** this map indicates the tracts 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.

DNRC completed an extensive EA scoping and public comment process for this proposed land sale. This included advertisement for solicitation of public comments in local newspapers, the DNRC website, adjacent land owners, and other interested parties.

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) –The DNRC retains the existing land ownership and will not sell 3,410.35 acres of state land currently held in trust for the benefit of Common Schools listed above by legal description. A lease agreement or license would be necessary to authorize FWP's use and management of State Trust Land within the Sun River WMA.

Alternative B (Proposed action) –The DNRC would request and recommend approval by the Land Board to sell the 3,410.35 acres of state land held in trust for the benefit of Common Schools Trust Land listed above. 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 combined 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.

This general area consists of rolling foothills, located along the Rocky Mountain Front. No unusual geologic features are known to be present.

The following is a list of the soil map unit names on 17 tracts of School Trust lands contained within the Sun River WMA, according to the NRCS Soil Survey.

Aridic Ustifluvents, channeled
Beanlake-Winspect stony loams
Beaverton-Shawmut very gravelly loams
Bridger silt loam, moderately wet
Fairfield-Beanlake-Winspect stony loams
Fairway silt loam
Farnuf loam
Fluvaquents, saline
Fluvaquents and Fluvaquentic Haplustolls soils
Hilger-Regent-Castner stony loams
Holter-Castner channery loams
Regent-Castner complex
Regent-Wayden-Cabba complex
Rittel-Tolex complex
Shawmut gravelly loam
Water
Wayden-Cabba-Rock outcrop complex
Whitcow channery loam
Whitore, dry-Tropal complex
Winspect-Cabba-Wayden complex

Topography is rolling to steep slopes composed of native rangeland and forested 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 forested land. It is unlikely these tracts would be broke for agricultural production in the future or managed for timber resources as they have been historically used as wildlife management and grazing land. It is expected this land will be used for wildlife management in the future.

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

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to the geology, soil quality, stability or moisture would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The proposal does not involve any ground disturbance, so no soil impacts are anticipated. No cumulative impacts to the geology, soil quality, stability or moisture would occur as a result of the proposed action.

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.

Water rights exist in section 36 to service a well for FWP's office and a head-gate for irrigation purposes on Barr Creek. FWP has a water right for fish and wildlife use in section 11.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to water resources would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. Existing water rights and other water related issues would not be affected by the proposed action. Other water quality and/or quantity issue will not be impacted by the proposed action as no change in land use is expected.

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.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to air quality would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The proposal does not include any on-the-ground activities, or changes to activities. No effects to air quality would occur as no change in land use is expected.

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.

Rangeland: The vegetation on the lands in this proposal consist of approximately 2,780 acres of native rangeland that is typical of the Foothills & Mountains, 15 – 19" precipitation zone. Range sites are extremely variable on these tracts of land, ranging from Douglas fir understory sites to sub-irrigated and wetland sites. However, most of the sites are classified as silty and shallow. The species composition on these lands is dominated by grasses that include rough fescue, bluebunch wheatgrass, Idaho fescue, green needlegrass, needle and thread, junegrass, western wheatgrass, sandberg bluegrass, Kentucky bluegrass, and timothy. Other vegetation consists of various forbs, shrubs, and trees. The overall range condition on these lands is rated as excellent. The average stocking rate/carrying capacity is 0.325 AUMs per acre.

Forested Land: Of the areas proposed for sale, 628 acres are forested. There is an estimated 1770 MBF of timber in the proposed tracts. Commercial Timber species includes Douglas-fir and lodgepole pine, non-commercial species include aspen and limber pine. The proposed sale area includes areas listed as non-inventoried in DNRC's Stand Level Inventory. The proposed sale area has been impacted by mountain pine beetle, and western spruce budworm.

There is one plant species of concern noted, Black golf club moss, and zero potential species of concern noted on the MTNHP survey for T21N R8W.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to vegetation cover, quantity and quality would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. Vegetation may be affected by numerous land management activities including livestock grazing, development, wildlife management, or other agricultural uses. Besides one plant species of concern, Black golf club moss, the vegetation on these tracts are typical of land throughout the vicinity and there are no known rare, unique cover types or vegetation in the area. It is expected that these lands will remain used for wildlife management purposes. Fish, Wildlife, and Parks has indicated if they purchased these lands, the land use would not change. The proposal does not include any on-the-ground activities, or changes to activities and therefore DNRC does not expect direct, indirect, or cumulative effects to the vegetation as a result of the proposal.

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 considered critical wildlife habitat. These tracts provide habitat for a variety of big game species (elk, mule deer, whitetail deer, and pronghorn antelope), predators (coyote, fox, and badger), upland game birds (Blue, grouse, ruffed grouse and Hungarian partridge), other non-game mammals, raptors and various songbirds. The proposal does not include any change in land use which would alter 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.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. There are no unique or critical wildlife habitats associated with the state tracts and DNRC does 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.

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 MTNHP was conducted for T21N, R8W: The survey returned 7 Mammals listed as species of concern including: Wolverine, Hoary Bat, Canada Lynx, Fisher, Little Brown Myotis, Fringed Myotis, and Grizzly Bear. The survey also returned 7 bird species of concern, Northern Goshawk, Golden Eagle, Veery, Brown Creeper, Trumpeter Swan, Long-billed Curlew, and Horned Grebe. There are no animal species of potential concern noted.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. Therefore, no direct, indirect, or cumulative effects are expected to these species of concern.

Alternative B (Proposed Action) – Threatened or endangered species, sensitive habitat types, or other species of special concern or potential species of concern will not be impacted because no management changes are expected from the sale of the tracts. No direct, indirect, or cumulative effects are expected to these species of concern.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

Scoping letters were sent to all Tribal Historic Preservation Officers (THPOs) in the state, as well as the Nez Perce and Fort Hall Shoshone-Bannock Tribes in Idaho. **No response was returned that identified a specific cultural resource issue.** A Class I (literature review) level review was conducted by the DNRC staff archaeologist for the School Trust parcels proposed for sale. This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards.

The Class I search results revealed that very little inventory of cultural or paleontologic resources has occurred on the subject state tracts, so the full extent of these resources is unknown. Two paleontologic sites are located on Sections 2 and 12, T21N R8W. Site 24LC1782 (Section 2) is reported to be non-descript dinosaur bone fragments. Site 24LC1780 (Section 12) contains fossil egg fragments of both bird and dinosaur.

Cultural resources consist of an abandoned homestead (24LC1108) and a stone circle site (24LC1111) in Section 13, T21N R8W, a human skull (24LC405) is reported to have been removed in the 1970's from a gravel pit in the SWNW1/4 Section 16, T21N R8W. The site form also notes stone circles in the SWNE1/4 of the same section. Another stone circle site (24LC404) is reported to be situated in the SE1/4 Section 26, T21N R8W. Although none of the cultural or paleontologic resources have been formally evaluated, sale of the DNRC administered School Trust parcels to the Montana Department of Fish, Wildlife and Parks (FWP), will have No Effect on Antiquities. This is because the FWP is also a state land managing agency with the same statutory mandates as DNRC under the Montana State Antiquities Act.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. Therefore, no direct, indirect, or cumulative effects are expected to historical, archaeological or paleontological resources.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The proposal does not include any on-the-ground activities, or changes to activities. There are no unique or critical historical, archaeological or paleontological resources associated with the state tracts and DNRC does not expect direct or cumulative wildlife impacts would occur as a result of implementing the proposal.

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 in the foothills located along the Rocky Mountain Front. While view and vistas are scenically grand, the state land does not provide any unique scenic qualities not also encountered on adjacent private and public lands.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to aesthetics would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The proposal does not include any on-the-ground activities, so there would be no change to the aesthetics regarding the proposed 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 5,184,399.00 acres of Trust land and 4,625,271.00 acres of Common Schools surface ownership in Montana, (TLMD, 2014 Annual Report).

There are approximately 86,065 acres of Common Schools Trust in Lewis and Clark County and 249,645.69 acres of Common School Trust in the Helena Unit, (TLMS). This proposal includes 3,410.35 acres in Lewis and Clark County. This equals approximately 3.96% of the state land (Common Schools) within Lewis and Clark County.

Cumulatively, these lands considered for sale represent 2.55% of the state trust land surface ownership in Lewis and County (133,692.15 acres), 1.0% of state trust land surface ownership in Helena Unit surface ownership (343,212.26 acres).

There are additional tracts of state land currently under consideration for sale through the Land Banking Program. 4,158.43 additional acres of state trust land in Lewis and Clark County are being considered.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to environmental resources would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. 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.

The DNRC is not aware of other projects or plans being considered on the tracts 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.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to human health and safety would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The potential transfer of ownership will not pose any greater to risk of human health and safety.

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 were formerly leased by FWP for grazing (AGMB #2006). However, this grazing lease was converted to a Land Use License in 2012 (LUL-3073268). The initial fee was \$17,026.75; FWP paid 2012-2014 in one lump sum totaling \$52,108.67. A 2% increase occurs annually. The table below indicates the DNRC rated carrying capacity of the tracts being considered for sale as they pertained to the former grazing lease.

| Legal | Acres (Surface) | Lease # | State rated carrying capacity (AUM) |
|----------|-----------------|----------------|-------------------------------------|
| 21N 8W 2 | 79.73 | Formerly #2006 | 41 |
| 21N 8W 8 | 40.00 | | 16 |

| | | | |
|-----------|--------------------------------------|--|-------|
| 21N 8W 9 | 40.00 | | 13 |
| 21N 8W 10 | 40.00 | | 16 |
| 21N 8W 11 | 200.00 | | 56 |
| 21N 8W 12 | 120.00 | | 36 |
| 21N 8W 13 | 160.00 | | 34 |
| 21N 8W 14 | 240.00 | | 85 |
| 21N 8W 15 | 80.00 | | 34 |
| 21N 8W 16 | 640.00 | | 166 |
| 21N 8W 17 | 160.00 | | 22 |
| 21N 8W 21 | 200.00 | | 49 |
| 21N 8W 22 | 120.00 | | 48 |
| 21N 8W 23 | 320.00 | | 96 |
| 21N 8W 26 | 240.00 | | 74 |
| 21N 8W 35 | 80.00 | | 29 |
| 21N 8W 36 | 645.62 | | 278 |
| Total | 3,405.35 (-5 acres com. Lease) | | 1,093 |

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to industrial, commercial or agricultural activities would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. This proposal does not include any specific changes to the current activities. Sale of the land to FWP would enhance their FWP’s management options. 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.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to quantity and distribution of employment would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. This proposal does not include any specific changes to the current activities. The proposal would have no impacts 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.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement with DNRC retaining ownership. Since Trust Land is tax exempt, local and state tax base and revenues would not be impacted as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP lands are not tax exempt. If the parcels in this proposal were sold to FWP and the use continued as a wildlife management area, Lewis and Clark County would receive 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

These tracts are remote, mountain grazing lands with a small number of FWP/DNRC managed road systems. All state and private land are protected by Lewis and Clark County, Augusta Fire Department in conjunction with the County Coop Fire Program and mutual aid agreements with adjacent county fire departments and the Lewis and Clark National Forest.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to the demand for government services regarding traffic or fire protection would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – The change in ownership as a result of this proposal will have no impact to the demand for government services regarding traffic or fire protection.

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 and/or adjacent to private, Federal, and FWP land. DNRC is not aware of zoning or other agency management plans affecting these lands.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement with DNRC retaining ownership. No impacts are anticipated resulting from or to locally adopted environmental plans and goals.

Alternative B (Proposed Action) – The change in ownership as a result of this proposal will have no impact(s) resulting from or to locally adopted environmental plans and goals.

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.

FWP provides public access to all of these school trust land tracts from May 15 to December 1. DNRC and the general public have full legal access to these tracts by county road in the following sections: 2, 11, 12, 13, 14, 23, 26, 35, 36. The remaining sections do not have legal access for DNRC or the general public outside of the May 15 to December 1 time frame. However, FWP has always provided administrative access when requested by DNRC. Recreational values are high due to these tracts being contained in the Sun River WMA.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to wilderness and recreational activities would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – Montana FWP has indicated if they purchased these tracts, the land use would remain as a wildlife management area. The potential transfer of ownership is not anticipated to impact access or wilderness and recreational 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 foothill country along the Rocky Mountain Front containing the Sun River WMA is sparsely populated with isolated ranches and farms existing on adjacent private lands. Wildlife management is prohibitive to increases in population or housing. An administrative building is present on trust land within the WMA on T21N R6W 36.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to density and distribution of population and housing would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – The proposal does not include any changes to housing or developments. The nominating lessee has indicated the lands would continue as wildlife management and grazing lands, if they purchase them 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 wildlife management. With the exception of isolated ranches and farms existing on adjacent private lands, the State land is generally indistinguishable from the adjacent private lands with little uniqueness in quality.

Alternative A (No Action) – Montana FWP will continue to manage the Trust Parcels in the same fashion under the current lease/license agreement. No impacts to cultural uniqueness and diversity would occur as a result of the no-action alternative.

Alternative B (Proposed Action) – The potential sale of the state land would not impact cultural uniqueness or diversity. It is unknown what changes to management activities may take place on the lands if ownership is transferred. The tracts were nominated by the DNRC with the intent of selling these parcels to FWP and continuing use as a wildlife management area.

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.

The tables below indicate current revenue generated from the nominated lands for land banking. Table A displays current land use license income. Table B indicates what the revenue generated by grazing would be if the Land Use License was not executed and a grazing lease was issued.

Table A:

| Legal | Acres | 2015 License Income | Income per acre-current Land Use License |
|-------------------|----------|---------------------|--|
| See above list(s) | 3,410.35 | \$18,068.92 | \$5.29 |

Table B:

| Legal | Acres (Grazing) | 2015 Lease Income | Income per acre-former grazing lease |
|-------------------|-----------------|-------------------|--------------------------------------|
| See above list(s) | | | |

| | | | |
|-------|------------------------------------|-------------|---------------------------------|
| Total | 3,405.35 (-5 acres c. lease) | \$15,750.13 | Average per acre income =\$4.62 |
|-------|------------------------------------|-------------|---------------------------------|

The statewide stocking rate for grazing land on 4.1 million acres averages 0.24 AUMs per acre or a total of 968,000 AUMs (2014 DNRC Annual Report). 2014 statewide grazing land gross revenue was \$11,607,840.00 or (\$11.99 per AUM) on 4.1 million grazing acres for an average income of \$2.83 per acre (2014 DNRC Annual Report). The tracts nominated for sale are higher than the average statewide stocking rate/carrying capacity at 0.325 AUMs per acre and they would have a higher than average statewide income for grazing land at \$4.62/acre with the 2015 rate at \$14.41 per AUM. Since FWP's use is authorized through a land use license, the actual income per acre is \$5.29. This income is higher than the above average potential grazing lease revenue.

From 2006-2015, 2,213 acres in Lewis and Clark have been sold through the land banking process. This resulted in a total sale value of \$1,959,000.00 or \$885.00 per acre in Lewis and Clark County.

From 2006-2015, 165 acres in Cascade have been sold through the land banking process. This resulted in a total sale value of \$132,000.00 or \$800.00 per acre in Cascade 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.

Scattered DNRC ownership within FWP – WMA results in long term management difficulties for both state agencies. Cumulatively, these tracts provide adequate return to the trust beneficiaries, while FWP considers these DNRC in-holdings essential to the future term management of the WMA. These DNRC tracts are unlikely to be used for any other purpose, and future leasing options, under competitive terms, is very limited. The sale of these tracts to FWP is logical due to the limited future management options for DNRC. Through the land banking sale, DNRC can use the proceeds to purchase replacement properties with a higher rate of return, which simultaneously provide public access for recreation, and general wildlife habitat.

| | | |
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| EA Checklist Prepared By: | Name: Andy Burgoyne | Date: June 18, 2015 |
| | Title: Unit Manager, Helena Unit, Central Land Office | |

V. FINDING

25. ALTERNATIVE SELECTED:

Alternative A

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The process of completing EA checklist did not identify significant potential impacts. The sale will allow FWP to manage at their discretion

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

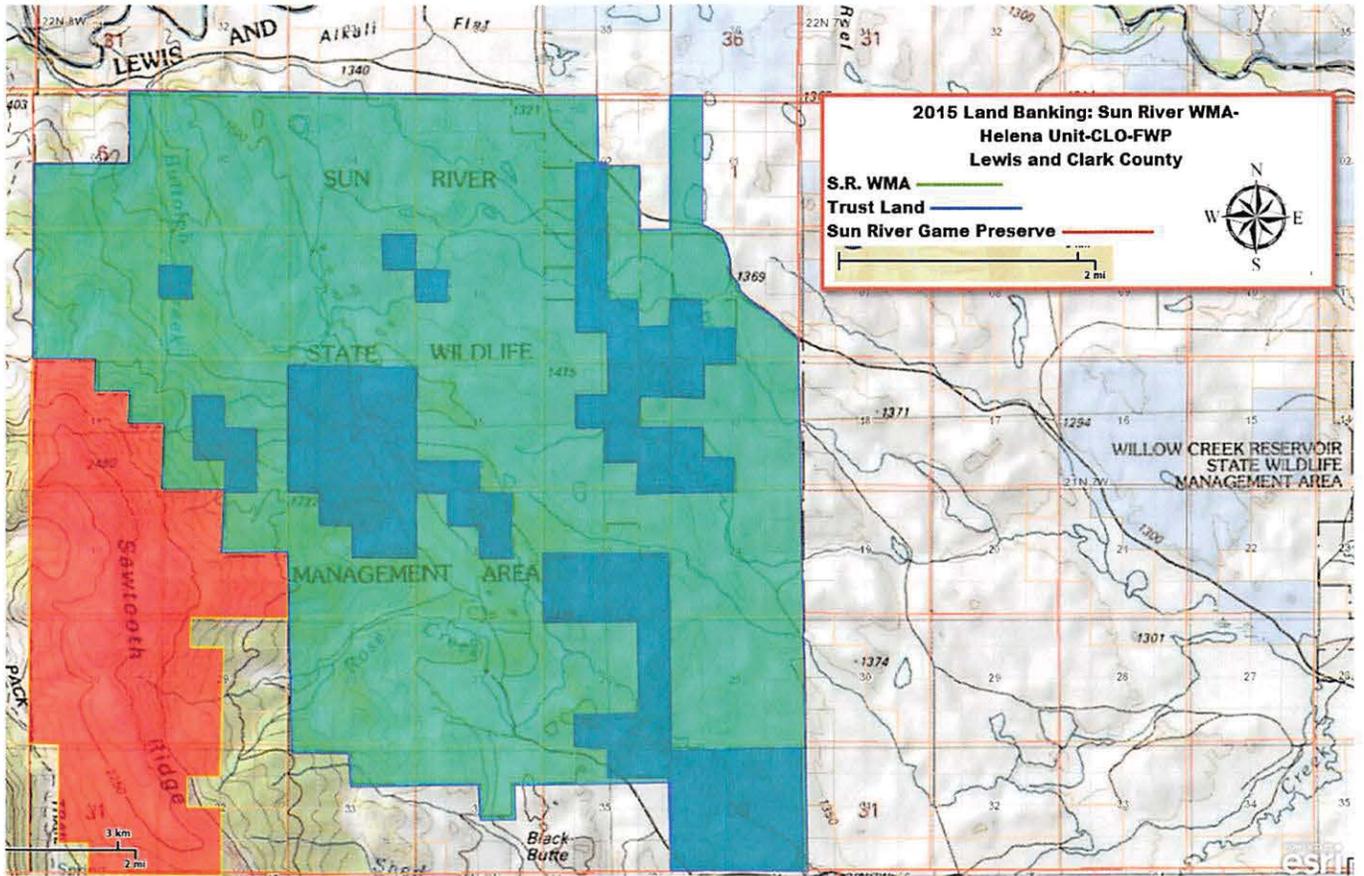
EIS

More Detailed EA

No Further Analysis

| | |
|----------------------------------|---|
| EA Checklist Approved By: | Name: R. Hoyt Richards |
| | Title: Area Manager, Central Land Office |
| Signature: Hoyt Richards | Date: 7/1/15 |

Exhibit B- Sun River WMA/Nominated Trust Land Tracts



| Name | Association | Address | City | State | Zip |
|----------------------|--|-------------------------------|------------------|-------|------------|
| | Billings Trap Club | PO Box 415 | Billings | MT | 59103 |
| | Bitterroot Trout Unlimited | PO Box 262 | Hamilton | MT | 59840 |
| | Blackfoot Valley Dispatch | PO Box 427 | Lincoln | MT | 59639 |
| | BLM | 3990 Us Highway 2 West, Havre | Havre | MT | 59501-5906 |
| | Blue Ribbon Flies | PO Box 1037 | West Yellowstone | MT | 59758 |
| | Bray Ranch | Box 215 | Musselshell | MT | 59059 |
| | Cascade County Commission | 415 2nd Ave | Great Falls | MT | 59401-2536 |
| | Circle Rifle Club | PO Box 343 | Circle | MT | 59215 |
| | Environmental Quality Council | Deadhead | Helena | MT | 59620 |
| | Five Valleys Archery Club | PO Box 5083 | Missoula | MT | 59806 |
| | Five Valleys Audubon Society | PO Box 8425 | Missoula | MT | 59807 |
| | Gallatin Wildlife Association | PO Box 3979 | Bozeman | MT | 59717 |
| | Havre Daily News | PO Box 431 | Havre | MT | 59501 |
| | Jefferson Valley Sportsmen Association | PO Box 255 | Whitehall | MT | 59759 |
| | Last Chance Audubon | PO Box 924 | Helena | MT | 59624 |
| | Lewis & Clark County Commission | 316 N Park Ave | Helena | MT | 59601-5026 |
| | Montana Stockgrowers Association | 420 N California | Helena | MT | 59601-8050 |
| | Montana Wild Sheep Foundation | PO Box 17731 | Missoula | MT | 59808 |
| | NRA, Hunter Svcs Dept | 11250 Waples Mill Rd | Fairfax | VA | 22030-7400 |
| | Ray's Sports & Western Wear | PO Box 306 | Harlowton | MT | 59036 |
| | Teton County Commission | PO Box 610 | Choteau | MT | 59422-0610 |
| | Upper Missouri Audubon | PO Box 2362 | Great Falls | MT | 59403 |
| | US Fish And Wildlife Service | 585 Shephard Way | Helena | MT | 59601-9785 |
| | Wilderness Society | 503 W Mendenhall | Bozeman | MT | 59715-3450 |
| | Wool Growers Association | 7 Edwards St | Helena | MT | 59601 |
| | Yellowstone Valley Audubon Society | PO Box 1075 | Billings | MT | 59103 |
| Forest Supervisor | Lewis & Clark National Forest | 1101 15th St N, Box 869 | Great Falls | MT | 59403 |
| Lizotte | | 6205 Helena Dr | Missoula | MT | 59803 |
| Aaron Hunt | | PO Box 5622 | Missoula | MT | 59806 |
| Alane Fitzpatrick | | 1022 Hollins | Helena | MT | 59601 |
| Allen Schallenberger | | 53 Elser Lane | Sheridan | MT | 59749-9604 |
| Alonzo Coby | Fort Hall Business Council | PO Box 306 | Fort Hall | ID | 83203 |
| Alvin Windy Boy | Tribal Historic Preservation Officer | RR 1 #544 | Box Elder | MT | 59521 |
| Andy Hicks | | 82 Bonnie St. | Glasgow | MT | 59230 |
| Anne Hedges | Montana Environmental Information Center | PO Box 1184 | Helena, | MT | 59624 |
| Ben Deeble | National Wildlife Federation | 240 N Higgins Ave #2 | Missoula | MT | 59802 |
| Bernie Hall | Montana Nature Conservancy | 32 S Ewing Street | Helena | MT | 59601-5702 |
| Betsy Robinson | | 8897 Sandy Creek Lane | Bozeman | MT | 59715 |
| Betty D'almeida | | PO Box 424 | Conner | MT | 59827 |
| Bill Anderson | | PO Box 88 | Stockett | MT | 59480 |
| Bill Berg | | 102 Turquoise Drive | Lewistown | MT | 59457 |
| Bill Henne | | PO Box 132 | Elliston | MT | 59728-0132 |
| Bill Janecke | | 24 Vigilante Trail | Clancy | MT | 59634 |
| Bill Jones | Two Dot Land & Livestock Company | PO Box 769 | Harlowton | MT | 59036 |
| Bill Massee | | PO Box 56 | Helmville | MT | 59843-0056 |

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|-----------------------------------|--------------------------------------|------------------------------|--------------|----|------------|
| Bill Mitchell | | 364 Mccarthy Loop | Hamilton | MT | 59840 |
| Bill Orsello & Stan Frasier | Montana Wildlife Federation | PO Box 1175 | Helena | MT | 59624 |
| Bill Stong | | 942 Hwy 10 W | Livingston | MT | 59047 |
| Blake Henning | Rocky Mountain Elk Foundation | 5705 Grant Creek Road | Missoula | MT | 59808-8249 |
| Bob Bedey | | 323 North 4th | Hamilton | MT | 59840 |
| Bob Bugni | | 3856 Remington St | East Helena | MT | 59635 |
| Bob Hagedorn | | PO Box 43 | Volberg | MT | 59351 |
| Bob Lucas | Big Sky Upland Bird Assn | 5050 Huckleberry Rd | Missoula | MT | 59803 |
| Bob Seidel | | PO Box 631 | Eureka | MT | 59917 |
| Bob Sheppard | | PO Box 129 | Ovando | MT | 59854-0129 |
| Bob Vogel | Montana School Boards Assoc. | 863 Great Northern Blvd | Helena | MT | 59601 |
| Brent Lonner | Montana FWP | PO Box 488 | Fairfield | MT | 59436 |
| Brett Haskett | Shoshone-Bannock Tribes | PO Box 306 | Fort Hall | ID | 83203 |
| Brooklyn Batiste | Nez Perce Tribal Executive Committee | PO Box 305 | Lapwai | ID | 83540 |
| Bruce B Benson | | PO Box 326 | Avon | MT | 59713-0326 |
| Bruce Bugbee | American Public Land Exchange | 125 Bank St, Suite 610 | Missoula | MT | 59802 |
| Bruce Farling, Executive Director | Montana Trout Unlimited | PO Box 7186 | Missoula | MT | 59807 |
| Buck Damone | | 1117 Castle Butte Rd | Lewistown | MT | 59457 |
| Budget Director | Office of Budget & Program Planning | PO Box 200802 | Helena | MT | 59620-0802 |
| Calvin Duerr | | 714 Adel Rd | Cascade | MT | 59421 |
| Carl Anderson | | 716 26th Ave NE | Great Falls | MT | 59404 |
| Carl Gill | | 648 Hidden Valley Rd South | Florence | MT | 59833 |
| CB Schantz | Red Rock Sporting Goods | PO Box 1117 | Miles City | MT | 59301 |
| Charles Allen | | 880 Sanford Park | Chester | MT | 59522 |
| Charles Carter | | PO Box 716 | Broadus | MT | 59317 |
| Charlie Johnson | Montana Bowhunter Assn | 1035 Larkview | Stevensville | MT | 59870 |
| Chase Hibbard | Sieben Livestock | P.O.Box 835 | Helena | MT | 59624 |
| Chris Hohentlohe | | 1824 Phelps Pl Nw #1815 | Washington | DC | 20008-1850 |
| Chris Ross | | 2815 Boulder Road | McLeod | MT | 59052 |
| Chris Servheen | Grizzly Bear Recovery Office | Main Hall 309 - UM | Missoula | MT | 59812 |
| Christy Clark | | PO Box 423 | Choteau | MT | 59422-0423 |
| Chuck Abell | Whitefish Outdoors | PO Box 37 | Whitefish | MT | 59937 |
| Claudio Broncho | Shoshone-Bannock Tribes | PO Box 306 | Fort Hall | ID | 83203 |
| Clay Crawford | | 588 Teton Canyon Rd. Box 466 | Choteau | MT | 59422 |
| Clyde Leischner | | 1709 N Strevell | Miles City | MT | 59301 |
| Conrad Fisher | Tribal Historic Preservation Officer | PO Box 128 | Lame Deer | MT | 59043 |
| Craig O'gorman | | PO Box 491 | Broadus | MT | 59317 |
| Craig Sharpe | Montana Wildlife Federation | PO Box 1175 | Helena | MT | 59624-1175 |
| Cross Canyon Ranch, LLC | | PO Box 260 | Abon | MT | 59713 |
| Curley Youpee | Fort Peck Tribes | POB 1027 | Poplar | MT | 59255 |
| Curtis Chamberlin | | Hc 60 Box 23 | Brusett | MT | 59318 |
| Dale Burk | Stoneydale Press | PO Box 188 | Stevensville | MT | 59870 |
| Dale Martin | | 2308 Locust St | Billings | MT | 59101-0553 |
| Dan Brewster | | 8359 County Rd 23 | Fort Lupton | CO | 80621-8921 |
| Dan Masse | | PO Box 115 | Ovando | MT | 59854 |
| Dan Pence | | 1455 Cosgrove Lane | Dillon | MT | 59725 |

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|-------------------------------------|--------------------------------------|--------------------------------|----------------|----|------------|
| Dan Vermillion | FWP Commissioner District 2 | PO Box 668 | Livingston | MT | 59047 |
| Dan Woodson | | PO Box 225 | St Regis | MT | 59866 |
| Dana Ranch Subdivision | | 1909 Adel Road | Cascade | MT | 59421 |
| Daniel Berube | | 27 Cedar Lake Dr | Butte | MT | 59701 |
| Daniel R Fiehrer | | PO Box 811 | Helena | MT | 59624-0811 |
| Daryl Kroon | | 909 Bald Eagle Drive | Bozeman | MT | 59715 |
| Dave Cole | | 6040 Ferry Drive | Helena | MT | 59602 |
| Dave Johnson | | 2532 Freezeout Lane | Deer Lodge | MT | 59722 |
| Dave Klein | | 5415 Klements Lane | Florence | MT | 59833 |
| Dave Majors | Montana Wildlife Federation | 3289 Wood Duck Lane | Stevensville | MT | 59870 |
| David Hirschfeld | Deep Creek Grazing Assoc. | PO Box 7 | Choteau | MT | 59422 |
| David Jelletich | | 32 Snook Trail | Clinton | MT | 59825 |
| David' Carriere | | 17095 Hwy 93 N | Missoula | MT | 59808 |
| Dean Dutton | | 190 Sunnyside Lane | Gold Creek | MT | 59832 |
| Deb Solum | | Box 243 | Rudyard | MT | 59540 |
| Denise Juneau, Superintendent | Office of Public Instruction | BOX 202501 | Helena | MT | 59620-2501 |
| Dennis Edwards | | PO Box 7 | Florence | MT | 59833 |
| Devils Kitchen Committee | C/O Montana Land Reliance | PO Box 355 | Helena | MT | 59624-0355 |
| Director | Dept Of Agriculture | PO Box 200201 | Helena | MT | 59620-0201 |
| Director | Dept Of Livestock | PO Box 202001 | Helena | MT | 59620-2001 |
| Director | Dept Of Transportation | PO Box 201001 | Helena | MT | 59620-1001 |
| Director | DPHHS | PO Box 4210 | Helena | MT | 59604-4210 |
| Director | Department Of Agriculture | PO Box 200201 | Helena | MT | 59620 |
| Don Guizzo | | PO Box 1039 | Condon | MT | 59826 |
| Don Karcewski | | 4417 53rd Ave SW | Great Falls | MT | 59404 |
| Donald Kern | Montana River Action Network | PO Box 383 | Helena | MT | 59624 |
| Donald Riley | | 1879 Tamarack Lane | Columbia Falls | MT | 59912 |
| Doris & George McMurray | | PO Box 86 | Choteau | MT | 59422 |
| Doug McClelland | | 34 Brookside | Missoula | MT | 59802 |
| Douglas Dreeszen | | 2481 S 22nd Rd | Ballantine | MT | 59006-9732 |
| Dr Ronald Sexton, Chancellor | Montana State University – Billings | 1500 N 30 th Street | Billings | MT | 59101 |
| Dwain Prellwitz | Milk River Ducks Unlimited | PO Box 1408 | Malta | MT | 59538 |
| Dwayne Pechia | | PO Box 964 | Choteau | MT | 59422 |
| Dylan Rincker | | 17255 Remount Rd | Huson | MT | 59846 |
| E Maynard Smith | | PO Box 320007 | Glen | MT | 59732 |
| E.T. Bud Moran | Conferated Salish & Kootenai Tribes | PO Box 278 | Pablo | MT | 59855 |
| Ed Puccenilli | | 2013 Hamburg Street | Anaconda | MT | 59711 |
| Ed Roe | | 2840 East Cedar Meadow Lane | Manhattan | MT | 59741 |
| Ed Uhlig | | PO Box 992 | Bonner | MT | 59823 |
| Edna M Johnson | | PO Box 2073 | East Helena | MT | 59635-2073 |
| Edward Hanson | | PO Box 562 | Troy | MT | 59935 |
| Erwin Hahn | | 5430 58th St SW | Great Falls | MT | 59404-5045 |
| Francis Auld | CS&KT-Tribal Preservation Department | PO Box 278 | Pablo | MT | 59855 |
| Frank Orlando | Harlem Rod & Gun Club | PO Box 25 | Harlmen | MT | 59526 |
| Frank Wiler | | 1207 Sorenson Road | Helena | MT | 59601 |
| Friends Of The Rocky Mountain Front | | PO Box 763 | Choteau | MT | 59422 |

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|--|--|---------------------------------|-----------------------|----|------------|
| Garett Bacon | | 5855 Bucktail Lane | East Helena | MT | 59635 |
| Gary Bertellotti, Region 4 Manager | Montana FWP | 4600 Giant Springs Road | Great Falls | MT | 59405 |
| Gary Ingman | | 1110 8th Ave | Helena | MT | 59601 |
| Gary J. Wolfe | FWP Commissioner District 1 | 4722 Aspen Drive | Missoula | MT | 59802 |
| Gary Olson, Wildlife Biologist | Montana FWP | 514 S. Front Street | Conrad | MT | 59425 |
| Gary Smith | Meagher Co Sportsmen Assn | PO Box 582 | White Sulphur Springs | MT | 59645 |
| Gene Hame | | 412 Circle Drive | Cut Bank | MT | 59427 |
| Gene R & Bette A Burt | | 640 Emery Rd | Deer Lodge | MT | 59722 |
| George Bieble | | 608 3rd Street SE | Sidney | MT | 59270 |
| George Chenoweth | | PO Box 586 | Belgrade | MT | 59714 |
| George M Reistad | | 4362 Greenhouse Rd | Deer Lodge | MT | 59722-8740 |
| Gerald Clay | | 1145 Cheyenne Rd | Helena | MT | 59602 |
| Glen Marx, Ex. Director | Montana Association Of Land Trust (Malt) | PO Box 675 | Whitehall | MT | 59759 |
| Glen Neville | | PO Box 838 | Superior | MT | 59872 |
| Glenn Hockett | Gallatin Wildlife Association | 745 Dome Rd | Bozeman | MT | 59718-8899 |
| Gollehon Ranch Llc | | PO Box 635 | Choteau | MT | 59422-0635 |
| Graeme Mcdougal | | 11805 Hwy 324 | Dillon | MT | 59725 |
| Greg Neudecker | US Fish & Wildlife Service Benton Lake Wetland Mgt Dist. | 922 Bootlegger Trail | Great Falls | MT | 59404 |
| Hank Goetz | Blackfoot Challenge | PO Box 148 | Ovando | MT | 59854 |
| Harold Blattie | Montana Assoc Of Counties | 2715 Skyway Dr. | Helena | MT | 59601 |
| Helena National Forest | | 2880 Skyway Drive | Helena | MT | 59602 |
| Henry J Kertula | | PO Box 334 | Avon | MT | 59713-0344 |
| Henry J. Bouma | | PO Box 971 | Choteau | MT | 59422-0971 |
| Henry Knight | | PO Box 226, Avon, MT 59713-0226 | Avon | MT | 59713-0226 |
| Herb Stahlberg | | 7305 Lolo Creek Road | Lolo | MT | 59847 |
| Herb Stolk | Laurel Rod & Gun Club | PO Box 986 | Laurel | MT | 59044 |
| Hope Stockwell | EQC, Montana Legislative Branch | PO Box 201706 | Helena | MT | 59620-1706 |
| Howard Pippin | Saco Sportsmen's Club | Box 137 | Saco | MT | 59261 |
| Howard Stromberg | Stromberg Ent Inc | PO Box 608 | Havre | MT | 59501 |
| Hubert Two Leggins THPO | The Crow Tribe of Indians | PO Box 159 | Crow Agency | MT | 59022 |
| Ira Matt | Tribal Preservation Department | PO Box 278 | Pablo | MT | 59855 |
| Jack Atcheson | Montana State Land Coalition | 3014 Irene Street | Butte | MT | 59701 |
| Jack Burk | | PO Box 1388 | Eureka | MT | 59917 |
| Jack Jones | Montana State Land Coalition | 3014 Irene Street | Butte | MT | 59701 |
| Jack McCormick | | 2931 Keokuk | Butte | MT | 59701 |
| Jack Schwenk | | PO Box 16778 | Missoula | MT | 59808-5778 |
| Jake Cummins | MT Farm Bureau Federation | 502 S 19th, SUITE 104 | BOZEMAN | MT | 59718 |
| James C Lane | | 557 Bitterroot Ln | Deer Lodge | MT | 59722-9586 |
| James F & Shoquist Willard | | 251 Franklin Mine Rd | Helena | MT | 59602 |
| James H Tomlinson | | 1132 Jake Creek Rd | Deer Lodge | MT | 59722-9597 |
| James Hanson | | Tony Creek Road | Melville | MT | 59055 |
| James Mitchell | | 870 Sleeping Child Rd | Hamilton | MT | 59840 |
| James Steele, Jr. | Confederated Salish & Kootenai Tribes | PO Box 278 | Pablo | MT | 59855 |
| Janet Ellis | Montana Audubon | PO Box 595 | Helena | MT | 59624 |
| Janet Zieg | | 1355 Smith River Rd | White Sulphur Springs | MT | 59645 |
| Jay Bodner, Natural Resources Director | MT Stockgrowers Association | 420 N California | Helena | MT | 59601 |

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|-------------------------------|---------------------------------------|--------------------------|----------------|----|------------|
| Jay Erickson | Missoula Land Reliance | PO Box 355 | Helena | MT | 59624 |
| Jeff Juel, Ecosystems Defense | Wildwest Institute | PO Box 7998 | Missoula | MT | 59807 |
| Jeff W Janke | | PO Box 258 | Avon | MT | 59713-0258 |
| Jeff Walton | | 540 Boulder Road | Big Timber | MT | 59011 |
| Jerry & Darlene Larson | | PO Box 823 | Choteau | MT | 59422 |
| Jerry Jacobsen | | 104 Rolling Grn Pl | Missoula | MT | 59803-2435 |
| Jerry Malson | | 22 Swamp Creek Road | Trout Creek | MT | 59874 |
| Jerry Shively | | 3 Golf Course Rd | Thompson Falls | MT | 59873 |
| Jerry Solberg | | 6525 Us Hwy 12 East | Martinsdale | MT | 59053 |
| Jerry Sorenson | Plum Creek Timber Company Lp | PO Box 1990 | Columbia Falls | MT | 59912 |
| Jim Anderson | | 620 W Cottonwood | Deer Lodge | MT | 59722 |
| Jim Buell | | PO Box 133 | Gliford | MT | 59525 |
| Jim Clawson | Western MT Fish & Game Assoc. | 11225 Windemere | Missoula | MT | 59801 |
| Jim Derleth | Mountain Moods, Outdoor Columnist | 4727 Stagecoach Trail Rd | Manhattan | MT | 59741 |
| Jim Gookin | Custer Rod & Gun Club | PO Box 303 | Miles City | MT | 59301 |
| Jim Griggs | Bullhook Bottoms Black Powder Club | PO Box 1351 | Havre | MT | 59501 |
| Jim Hathaway | | 1502 Aspen Dr | Missoula | MT | 59801 |
| Jim Knight | Montana State University | 235 Linfield Hall | Bozeman | MT | 59717-2820 |
| Jim Roscoe | | 1005 Selway Drive | Dillon | MT | 59725 |
| Jim Stone, Chairman | Blackfoot Challenge | PO Box 148 | Ovando | MT | 59854 |
| Joe Applegate | | 4574 Emery Rd | Deer Lodge | MT | 59722-9412 |
| Joe Maloney | | 950 Antimony | Butte | MT | 59701 |
| Joe Perry | | PO Box 131 | Brady | MT | 59416 |
| Joe Piazza | | 1002 Sautter Lane | Townsend | MT | 59644 |
| Joe Rivera | Blackfeet Tribe | PO Box 850 | Browning | MT | 59417 |
| Joelle Selk | Montana Bowhunter Assn | 6983 York Road | Helena | MT | 59802 |
| John & Lois Beck | | PO Box 294 | Avon | MT | 59713 |
| John A Rusin | | 2926 Beck Hill Rd | Deer Lodge | MT | 59722-9628 |
| John A Thompson | | 805 4th St | Deer Lodge | MT | 59722-1507 |
| John Andra | Shoshone Wilderness Adventures | PO Box 520 | Hamilton | MT | 59840 |
| John Baucus | | 1600 Sieben Canyon Rd | Wolf Creek | MT | 59648-0849 |
| John Carlsen | Bureau Of Land Management | 5001 Southgate Drive | Billings | MT | 59101-4669 |
| John Gibson | Public Lands Access Assoc. Inc. | 3028 Ave E | Billings | MT | 59102 |
| John Harrison | Confederated Salish & Kootenai Tribes | PO Box 278 | Pablo | MT | 59855 |
| John Helle | | 1350 Stone Creek Rd. | Dillon | MT | 59725-7332 |
| John M Beck | | PO Box 244 | Avon | MT | 59713-0244 |
| John Murray | THPO Blackfeet Tribe | PO Box 2809 | Browning | MT | 59417 |
| John Radonich | | 905 W 3rd | Anaconda | MT | 59711 |
| John Steuber | USDA APHIS Wildlife Services | PO Box 1938 | Billings | MT | 59103 |
| John Wozniak | | PO Box 4207 | Missoula | MT | 59806 |
| Joshua McGraw | | PO Box 260 | Avon | MT | 59713-0260 |
| Joyce Spoonhunter | Blackfeet Tribe | PO Box 850 | Browning | MT | 59417 |
| Julia Altemus | Montana Wood Products Assoc | PO Box 1967 | Missoula | MT | 59806 |
| Karla Aus | | 515 West 1st Avenue | Plentywood | MT | 59254 |
| Keith Kubista | | 528 Redtailhawk Lane | Stevensville | MT | 59870 |
| Keith Van Setten | | PO Box 696 | Choteau | MT | 59422-0696 |

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|--|---------------------------------|----------------------------|-------------------|----|------------|
| Ken D Johnson | | 2622 Jake Creek Rd | Deer Lodge | MT | 59722-9627 |
| Kyle Hardin | Matador Cattle Co. | 9500 Blacktail Rd. | Dillon | MT | 59725 |
| L.D. Miller | | 1011 Scenic Hwy | Look Out Mountain | GA | 30750 |
| Larry Ratray | Montana Bowhunter Assn | PO Box 186 | Proctor | MT | 59929 |
| Larry Strickland | | 6145 Center Drive | Helena | MT | 59602 |
| Larry Surber | | PO Box 1603 | Chinook | MT | 59523 |
| Les Castren | Skyline Sportsmens Club | PO Box 173 | Butte | MT | 59701 |
| Leslie Taylor | MSU Bozeman | P.O. Box 172440 | Bozeman | MT | 59717-0001 |
| Lewis Paschke | | 3416 King Ave E | Billings | MT | 59101 |
| Lisa Upson | | 4050 W Babcock St Apt 12 | Bozeman | MT | 59718-6313 |
| Lon Dale | Hellgate Civilian Shooters Assn | 2555 Gunsight Ct | Missoula | MT | 59801 |
| Lorry Thomas | Anaconda Sportsman Club | #2 Cherry | Anaconda | MT | 59711 |
| Louis E Hawkes, Ex Director | Public Lands Access Assoc. Inc. | 16 Cloninger Lane | Bozeman | MT | 59715 |
| Louis F & Nancy L Smith | | 1405 Shooting Star Lane | Deer Lodge | MT | 59722 |
| Lower Place Llc | | 1427 Yellowstone Trail | Deer Lodge | MT | 59722-9828 |
| Lyle Shannon | | 670 1st Rd NE | Fairfield | MT | 59436 |
| Lynn Carey | | PO Box 99 | Seeley Lake | MT | 59868 |
| Marc Cooke | | 3427 Rome Lane | Stevensville | MT | 59870 |
| Marc Matchett | | RR3 Box 3112 | Lewistown | MT | 59457-9510 |
| Mark Donovan | | PO Box 896 | Bozeman | MT | 59771 |
| Mark Schlepp | Freeeout Lake | Box 488 | Fairfield | MT | 59436 |
| Mark Schwomeyer | | 60 Hruska | Lewistown | MT | 59457 |
| Mark Shutts | | 48 Horse Creek Rd | Wilsall | MT | 59086 |
| Marlin Wiskow | | PO Box 574 | Gillette | WY | 54124 |
| Mary Ellen Schnur | | 16 North Fork Road | Townsend | MT | 59644 |
| Matthew Tourlotte | FWP Commissioner District 5 | 940 Blanco Circle | Billings | MT | 59105 |
| Max Bauer Jr | | 17850 Hwy 93 N | Florence | MT | 59833 |
| Meadows Ranch Inc | | PO Box 467 | Choteau | MT | 59422 |
| Mike Lopez | Nez Perce Tribe | PO Box 305 | Lapwai | ID | 83540 |
| Mike McCormick | | 50 Cut-Off Rd | Helmville | MT | 59843 |
| Mike Mueller | Rocky Mountain Elk Foundation | 5705 Grant Creek Road | Missoula | MT | 59808-8249 |
| Mike Pritchett | | 655 E 100 South | Spanish Fork | UT | 84660 |
| Mike Williams | | 13900 Hampton Dr | Clinton | MT | 59825-9718 |
| Mitch Mamestras | | 1524 Ervine Ave | Longmont | CO | 80501 |
| Montana Association Of Counties | | 2715 Skyway Dr. | Helena | MT | 59601 |
| Montana Environmental Information Center | | PO Box 1184 | Helena | MT | 59624 |
| Montana Petroleum Association | | PO Box 1186 | Helena | MT | 59624 |
| Montana Stockgrowers Association | | 420 North California | Helena | MT | 59601 |
| Montana Wilderness Association | | PO Box 37 | Choteau | MT | 59422 |
| Montana Wildlife Federation | | PO Box 1175 | Helena | MT | 59624 |
| Morris Belgarde, THPO | Fort Belknap Tribal Office | RR 1 Box 66 | Harlem | MT | 59526 |
| MT School Boards Assoc | | 863 Great Northern Blvd | Helena | MT | 59801 |
| Museum Of The Rockies Inc., | | 600 W Kagy Ave | Bozeman | MT | 59717-2730 |
| Nancy Schlepp | Montana Farm Bureau | 502 S 19th Suite 4 | Bozeman | MT | 59715 |
| Nathan Small | Fort Hall Business Council | PO Box 306 | Fort Hall | ID | 83203 |
| National Wildlife Association | | 240 North Higgins, Suite 2 | Missoula | MT | 59802 |

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|--|---------------------------------------|--------------------------|--------------|----|------------|
| Ned Wellborn | | 11775 Hwy 324 | Dillon | MT | 59725 |
| Nick Forester | | PO Box 7595 | Fort Smith | MT | 59035 |
| Nitumo Land Llc | | 1501 Airport Rd | Choteau | MT | 59422-9330 |
| Norris Family Llc | | 321 Ramble Inn Rd | Fort Shaw | MT | 59443 |
| Northern Montana Oil & Gas Association | Mountain View Energy Inc | PO Box 200 | Cut Bank | MT | 59427-0200 |
| Outdoors Editor | Billings Gazette | PO Box 36300 | Billings | MT | 59101 |
| Pat Flowers & Kari Janikula | FWP Region 3 Office | 1400 S 19th | Bozeman | MT | 59719 |
| Patrick Heffernan | Montana Wood Products | PO Box 1149 | Helena | MT | 59624 |
| Paul Wilkinson | | PO Box 633 | Superior | MT | 59872 |
| Phil Donally | | 40 Donally Lane | Superior | MT | 59872 |
| Pruyn Family Lmtd Partnership | | 2501 S Russell St | Missoula | MT | 59801-7917 |
| R & B Cebulski | | PO Box 449 | Seeley Lake | MT | 59868 |
| Ralph Rogers | Montana Falconers Assn | PO Box 63 | Winifred | MT | 59849 |
| Ray Marxer | Matador Cattle Co | 9500 Blacktail Rd | Dillon | MT | 59725 |
| Ray Rugg | Rugg's Outfitting | 459 Southside Rd | Superior | MT | 59872 |
| Rich Day | National Wildlife Federation | 240 N Higgins Ave | Missoula | MT | 59802 |
| Richard & Nancy Neal | | PO Box 193 | Choteau | MT | 59422 |
| Richard & Ryan Dejana | | 422 Summit Cr | Kalispell | MT | 59901 |
| Richard Dinstel | | HC 54 Box 37 | Alzada | MT | 59311 |
| Richard J Torquemada | Bureau Of Land Management | 3255 Fort Missoula Rd | Missoula | MT | 59802 |
| Richard Kerstein | FWP Commissioner District 4 | Box 685 | Scobey | MT | 59263 |
| Richard Miller | | PO Box 1303 | Anaconda | MT | 59711 |
| Richard Storey, Chancellor | Western MT College | 710 South Atlantic | Dillon | MT | 59725 |
| Richard Stuker | FWP Commissioner District 3 | 1155 Boldt Road | Chinook | MT | 59523 |
| Richard Walch | | 4611 Larch Lane | Missoula | MT | 59802 |
| Rick Douglas | | 221 N Ophir | Butte | MT | 59701 |
| Rick Horton | Big Horn County/Hardin Rod & Gun | PO Box 78 | Hardin | MT | 59034 |
| Rick Kinzell | | PO Box 625 | Glasgow | MT | 59230 |
| Rick Koepplin | | 11425 Mullan Road | Missoula | MT | 59808 |
| Rick Price | | 1 Ryan Road | Whitehall | MT | 59759-8639 |
| Rick Ripley | | 8920 MT Highway 200 | Wolf Creek | MT | 59648-8639 |
| Robert Flansaas | Noxon Rod & Gun Club | PO Box 1369 | Trout Creek | MT | 59874 |
| Robert Summers | | PO Box 1234 | Poplar | MT | 59255 |
| Rock Creek Cattle Company, Ltd | | 988 Rock Creek Cattle Rd | Deer Lodge | MT | 59722 |
| Rod Bullis | | 6785 Silver Fox Court | Helena | MT | 59602 |
| Rodney James | | PO Box 334 | Whitehall | MT | 59759 |
| Roger Lund | | Box 153 | Rolette | ND | 58366-0153 |
| Ron Andersen | | PO Box 241 | Cascade | MT | 59421-0241 |
| Ron Hansen | | 409 Missouri Ave | Deer Lodge | MT | 59722 |
| Ron Nail | | 5597 Hwy 93 S | Whitefish | MT | 59937 |
| Ron Thompson | | 1512 Schley Ave | Butte | MT | 59701 |
| Ronald Ries | | 4718 Old Shelby Rd | Conrad | MT | 59425 |
| Ronald Wandler | | 571 Ridge Rd | Stevensville | MT | 59870 |
| Rose Leach | Confederated Salish & Kootenai Tribes | 301 Main Street | Polson | MT | 59860 |
| Roy Hassinger | Western MT Bassmasters | 122 West Reserve | Kalispell | MT | 59901 |
| Samuel Penney | Nez Perce Tribal Executive Council | PO Box 305 | Lapwai | ID | 83540 |

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|-------------------------------------|---------------------------------------|------------------------|-------------|----|------------|
| Shannon Guse | | Box 67 | Clyde Park | MT | 59018 |
| Sherman T Anderson | | 1174 Deer Haven Dr | Deer Lodge | MT | 59722-9409 |
| Stan Peck | | Box 406 | Cascade | MT | 59421 |
| State Historic Preservation Office | | PO Box 201202 | Helena | MT | 59620-1202 |
| Stephen I Flynn | | 63 Appaloosa Dr | Deer Lodge | MT | 59722-9459 |
| Stephens Ranch Llc | | PO Box 823 | Choteau | MT | 59422 |
| Sterling Ranch Co | | 2929 Craig Frontage Rd | Wolf Creek | MT | 59648 |
| Steve Blenker | | 24015 County Rd 174 | Albany | MN | 56307 |
| Steve Rhodes | Montana Taxidermist Assn | PO Box 732 | Silver Star | MT | 59751 |
| Steven Michel & Floumoy Holland | | 1 Bray Rd | Helth | MA | 1346 |
| Stuart Lewin | | 615 3rd Ave N | Great Falls | MT | 59401 |
| Sun Mountain Lumber | | 181 Greenhouse Rd | Deer Lodge | MT | 59722 |
| Sun River Ranch LLC | | 1015 Eastman Dr | Bigfork | MT | 59911 |
| The Blackfeet Nation | | 1 Agency Square | Browning | MT | 59417 |
| The Nature Conservancy | | PO Box 825 | Choteau | MT | 59422 |
| The Wildemess Society | | 503 Mendenhall | Bozeman | MT | 59715 |
| Thomas Lind Kling Trustee | | 3063 La Pietra Cir | Honolulu | HI | 96815-4736 |
| Tim Beck | | PO Box 286 | Avon | MT | 59713-0286 |
| Tim Wheel | | PO Box 4747 | Helena | MT | 59604 |
| Tom Knuchel | | 1909 Clements Road | Missoula | MT | 59804 |
| Tom Mcdonald | Confederated Salish & Kootenai Tribes | PO Box 278 | Pablo | MT | 59855 |
| Tom Mills | | 3204 3a St NE | Great Falls | MT | 59404 |
| Tom Sather | Headwaters Fish & Game | PO Box 1941 | Bozeman | MT | 59771-1941 |
| Tom Weiss | | 709 S California | Helena | MT | 59601 |
| Tom Whitford | Custer National Forest | 1310 Main Street | Billings | MT | 59105-1986 |
| Tony Hoyt | | PO Box 51 | Arlee | MT | 59821 |
| Tony Schoonen | | 3609 Willoughby Ave | Butte | MT | 59701-4331 |
| Tribal Historic Preservation Office | Confederated Salish & Kootenai Tribes | PO Box 728 | Pablo | MT | 59855 |
| Triple DJ LLC | | 521 Park Ave. Fl 6 | New York | NY | 10065-8195 |
| USDA Forest Service | L&C National Forest Supervisor | Great Falls | Great Falls | MT | |
| USDA Forest Service | Helena National Forest Supervisor | Helena | Helena | MT | |
| USDI Bureau Of Land Management | | 5001 Southgate Dr | Billings | MT | 59101 |
| Vernon Keller | | 280 Fiddler Creek Rd | Fishtail | MT | 59028 |
| Voegele's INC | | PO Box 1122 | Great Falls | MT | 59403 |
| Warren Ulery, Etal | | 627 Madison Way | Great Falls | MT | 59404 |
| William Bacon | Shoshone-Bannock Tribes | PO Box 306 | Fort Hall | ID | 83203 |
| William Brown | | 43 Chasehill Dr | Big Sandy | MT | 59520 |
| William L Mosler, Jr | | 1340 Freezeout Ln | Deer Lodge | MT | 59722 |
| Wilma J. Britt | | 84 Darlen Rd | Howell | NJ | 07731-1845 |
| Zimmer Ranch Co | | 299 Donegal Dr | Bozeman | MT | 59715 |
| | Montana Smart Growth Coalition | 114 W. Pine St | Missoula | MT | 59802 |
| | Montana Wildemess Assoc. | 30 S Ewing | Helena | MT | 59601 |
| | Montrust | PO Box 1111 | Missoula | MT | 59806 |
| | Five Valley's Land Trust | PO Box 8953 | Missoula | MT | 59807 |
| | Rocky Mountain Elk Foundation | PO Box 8249 | Missoula | MT | 59807 |
| | Friends Of The Wild Swan | PO Box 103 | Bigfork | MT | 59911 |
| | Alliance For The Wild Rockies | PO Box 505 | Helena | MT | 59624 |
| | Hellgate Hunters & Anglers | PO Box 7792 | Missoula | MT | 59807 |
| | Greater Yellowstone Coalition | PO Box 1874 | Bozeman | MT | 59771 |

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| | Foundation For North American Wild Sheep | 720 Allen Ave | Cody | WY | 82414 |
| | Defenders Of Wildlife | 140 S 4th St W | Missoula | MT | 59801 |
| | Montana Bowhunters Assoc | 4503 Barbara Lane | Missoula | MT | 59803 |
| Defwo & Sons Limited Partnership | | 230 Blackleaf Road | Bynum | MT | 59419-0817 |
| Sieben Livestock Co. | | P.O. Box 835 | Helena | MT | 59624-0835 |
| Jessie M. Sieben | | P.O. Box 835 | Helena | MT | 59624-0835 |
| William Cobb & John Richardson | | P.O. Box 348 | Augusta | MT | 59410-0348 |
| Blenton Ranch Co. | | P.O. Box 211 | Augusta | MT | 59410-0211 |
| James Breeden Jr | | P.O. Box 607 | Augusta | MT | 59410-0607 |
| James Willards & Darrell Shoquist | | 251 Franklin Mone Road | Helena | MT | 59602-7114 |

Multiple comments were received concerning the ability of potential third party to outbid the FWP:

Under the Land Banking sale program, FWP as the lessee and nominator of the sale parcels is afforded the ability to stop the sale process up to ten days before the auction occurs. Any parties wishing to bid on the sale parcels at a Land Banking auction have to submit a bid deposit of 20% of the minimum bid price, 20 days before the auction. FWP would know beforehand if there would be any competitive bidders for the parcels, and would be able to cancel the auction up to ten days before the scheduled auction.

Additionally, DNRC is selling the land in three separate sale units. All DNRC's lands (8208.78 acres) within Lewis and Clark County (Sun River and Beartooth) will be sold as a single sale. Separate sales will take place for the single tract located in Cascade County (640 acres) and one sale for the three parcels in Teton County (639.48 acres).

Comments were received stating DNRC should give the land to FWP or DNRC should keep the land and allow the FWP to use the land at no cost to meet FWP's needs:

The DNRC is provided direction for the sale of lands and leasing of lands in the Montana Constitution. Specifically, Article 10, Section 11 of the Montana Constitution states: "**Public land trust, disposition...**(2) **No such land or any estate or interest** therein shall ever be disposed of except in pursuance of general laws providing for such disposition, **or until the full market value of the estate or interest disposed of**, to be ascertained in such manner as may be provided by law, has been paid or safely secured to the state..."

Comments were received questioning the ability of the DNRC to sell land with legal access:

The DNRC is provided direction for the sale of legally accessible lands by: "**MCA 77-2-363. Land banking land sales and limitations -- sale preparation costs.** (1) (a) The board may not cumulatively sell or dispose of more than 250,000 acres of state land. Seventy-five percent of the acreage cumulatively sold must be isolated parcels that do not have a legal right of access by the public". The Land Board can sell up to 62,500 acres of legally accessible land through the Land Banking program. To date, the Board has sold a total of 10,996 acres of legally accessible land, sale of these parcels would increase the total acres of legally accessible land sold to 20,484, well below the 62,500 acre limit.

Comments were received questioning how the DNRC sets the minimum value of the land to be sold and/or concerned with DNRC selling the land at too low of a value.

Under land banking the estimated fair market value of sale parcels must be determined by a Montana-Licensed and Montana-Certified General Appraiser. The appraisal must be completed in compliance with the Uniform Standards of Professional Appraisal Practice (USPAP), as adopted by reference by the State Board of Real Estate Appraisers in ARM [24.207.402](#). The appraiser must determine a highest and best use of the parcel, and value the parcel using comparable sales with the same or similar highest and best use. If the parcel does not have legal access, the appraiser is to value the property as if it does have legal access. The DNRC reviews or contracts the review of the appraisal, the appraised market value is then recommended to the Land Board as the minimum bid for a parcel.

Numerous comments were received outside the scope of this project.