CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name: **Revised** 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 new papers, 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
Whitecow 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.

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8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.

The area is 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 ease 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.

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9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:
Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

A review of Natural Heritage data through the 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.

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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.*

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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.

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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.

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16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:

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

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.

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17. LOCAL AND STATE TAX BASE AND TAX REVENUES:

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

State School Trust Lands are currently exempt from property tax. If State Trust Lands represent 6% or greater of the total acres within a county, a payment in lieu of taxes (PLT) is made to the counties to mitigate for the State Trust Land tax exempt status. Counties will not realize an adjustment in the PLT payment as a result of an increase or decrease in State Trust Land acreage.

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.

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18. DEMAND FOR GOVERNMENT SERVICES:

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

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.

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19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:

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

These tracts are surrounded by 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.

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

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

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

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 $14.41per 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 DRNC 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.

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 B

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The process of completing the EA checklist did not identify significant potential impacts. The sale of lands to FWP will allow them to manage to Achieve their WMA goals.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

- [ ] EIS
- [ ] More Detailed EA
- [x] No Further Analysis

EA Checklist Approved By:	**Name:**	R. Hoyt Richards
	Title:	Area Manager, Central Land Office
Signature: Hoyt Richards		**Date:** 7/13/2015

Exhibit A-Sun River WMA Land Banking Vicinity Map

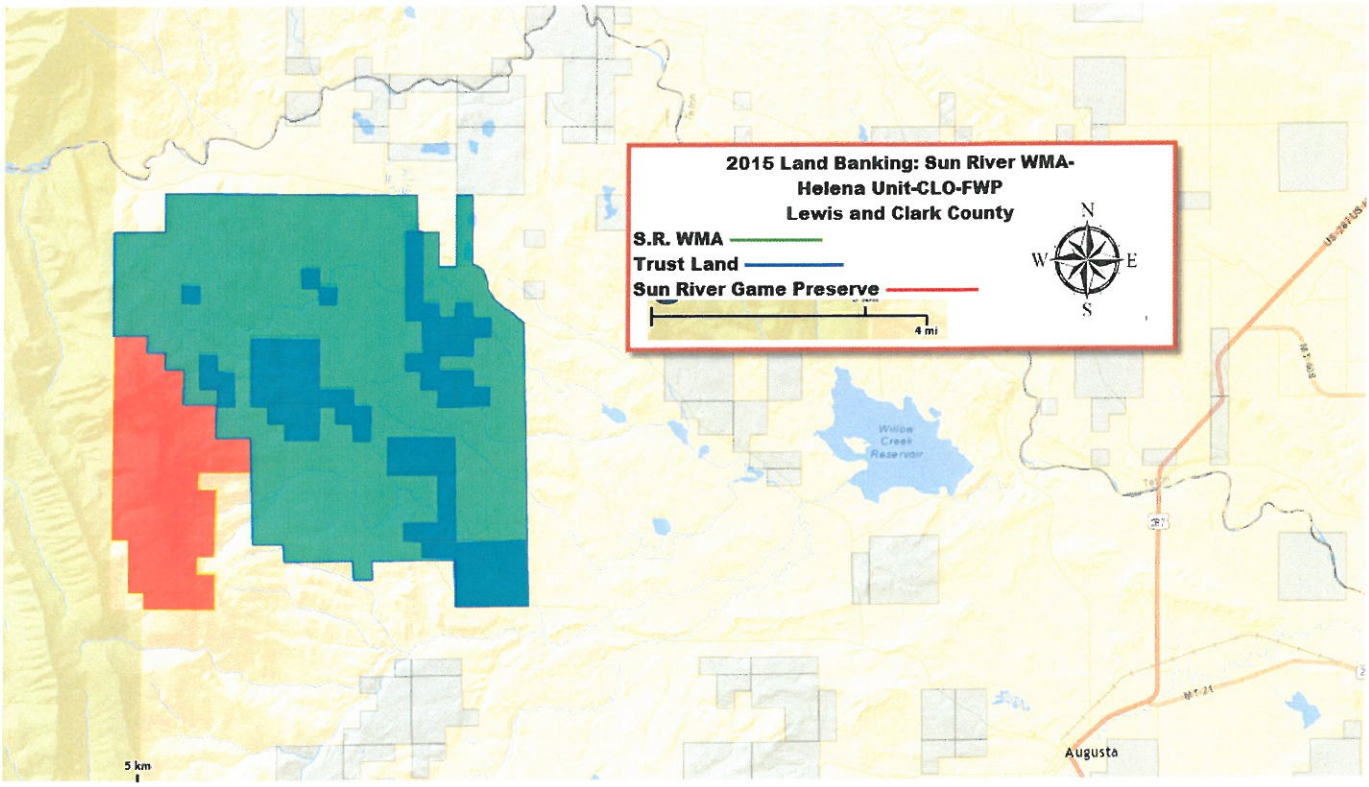
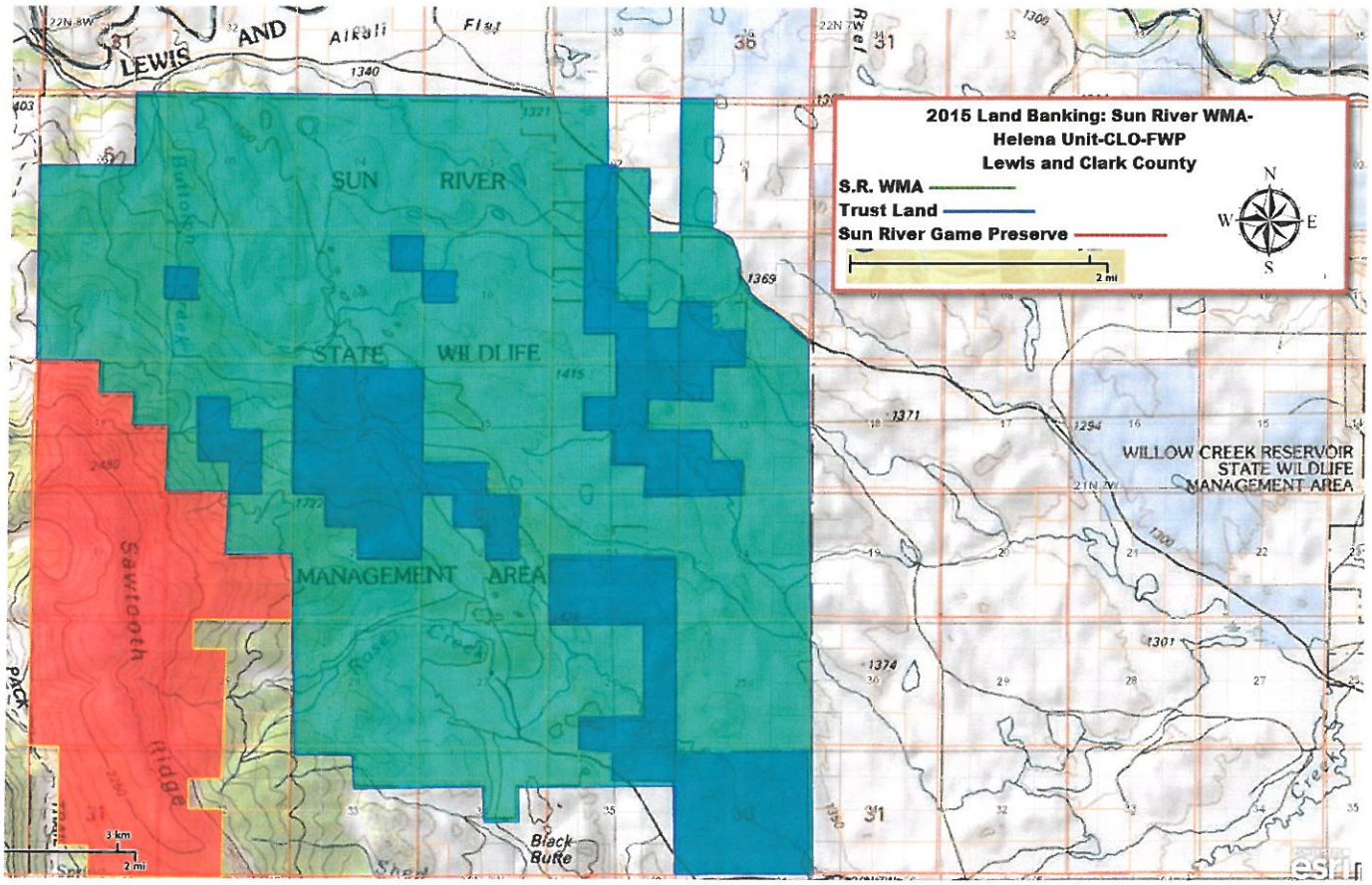


Exhibit B- Sun River WMA/Nominated Trust Land Tracts



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	Steben Livestock	P.O.Box 835	Helena	MT	59624
Chris Hohenlohe		1824 Phelps Pl Nw #1815	Washington	DC	20008-1850
Chris Ross		2815 Boulder Road	McLeod	MT	59052
Chris Servheen	Grizzley 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
Claudeo 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

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 Hirshfeld	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 30th 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

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 Harne		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 Kerttula		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

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 Gm 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	Gilford	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	6963 York Road	Helena	MT	59602
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 Andre	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	Confererated 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

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 Rattray	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	Helligate 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	Freeseout 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 Tourtlotte	FWP Commissioner District 5	940 Bronco 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	59601
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

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 Lmted 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

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 & Flournoy Holland		1 Bray Rd	Heth	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 Wilderness 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		290 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 Darien 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 Wilderness 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

	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
Deltwo & 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.