

CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	NorthWestern Energy Staging Site
Proposed Implementation Date:	Summer/Fall 2022
Proponent:	NorthWestern Corporation, d/b/a NorthWestern Energy
Location:	NW4SE4 of Section 2, T31N, R5W
County:	Pondera
Trust:	Common Schools (CS)

I. TYPE AND PURPOSE OF ACTION

NorthWestern Energy proposes a staging site for construction purposes on state land, referred to herein as the "Project". The proposed location is within the NW4SE4 of Section 2, T31N, R5W. The Project will cause temporary disturbance on approximately 1.84 acres. See **Exhibit A**, Project Location Map.

II. PROJECT DEVELOPMENT

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

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

The Project is located on state-owned land and NorthWestern Energy is the proponent. Agencies involved in the permitting process include the Montana Department of Natural Resources and Conservation, (DNRC) – Trust Land Management Division

Surface Lessee:

LOTS 4, 5, 6, 7, 8, SE4NW4, SW4NE4, NW4SE4, NE4SW4, Section 2, T31N, R5W – Lease No. 6588 – Edward McCauley

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

DNRC is not aware of any other agencies with jurisdiction or other permits needed to complete this Project. The Project will be permitted under a Land Use License (LUL).

3. ALTERNATIVES CONSIDERED:

Alternative A (No Action) – Deny NorthWestern Energy the requested LUL and permission to install the temporary staging area.

Alternative B (the Proposed action) – Grant NorthWestern Energy the requested LUL and permission to install the temporary staging area.

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.

Soil Properties:

There are two types of soils found within the Project footprint.

(163C) Kevin-Hillon clay loams, 2 to 8 percent slopes:

These soils consist of very deep (more than 80 inches), well-drained soils. These soils are found within rises. Available water supply, 0 to 60 inches is about 10 inches (Kevin) and about 9.2 inches (Hillon); the mean annual precipitation for the region is 10 to 14 inches (Soil Survey of Choteau-Conrad Area; Parts of Teton and Pondera Counties, Montana).

(376F) Hillon-Cabbart loams, 15 to 60 percent slopes:

These soils consist of very deep, more than 80 inches (Hillon) and shallow, 10 to 20 inches to paralithic bedrock (Cabbart), well-drained soils. These soils are found within hillslopes. Available water supply, 0 to 60 inches is about 8.8 inches (Hillon) and about 2.2 inches (Cabbart); the mean annual precipitation for the region is 10 to 14 inches (Soil Survey of Choteau-Conrad Area; Parts of Teton and Pondera Counties, Montana).

Soil Stability:

K – Factor:

Soils identified within the Project footprint have a Soil Erodibility (K) Factor of 0.24 to 0.28, see **Table 1** below for additional information (Soil Survey of Choteau-Conrad Area; Parts of Teton and Pondera Counties, Montana). The K Factor range is 0.02 to 0.69 (0.69 being the most susceptible to sheet and rill erosion by water.) The K Factor is low to moderate for the Project site which indicates a low to moderate susceptibility to erosion by water.

Table 1 – K – Factor Rating by Soil Type

	Soil	Rating
163C	Kevin-Hillon clay loams, 2 to 8 percent slopes	0.24
376F	Hillon-Cabbart loams, 15 to 60 percent slopes	0.28

Wind Erodibility Group:

Soils identified within the Project footprint have a Wind Erodibility Group (WEG) of 4 – 6, see **Table 2** below for additional information (Soil Survey of Choteau-Conrad Area; Parts of Teton and Pondera Counties, Montana). The WEG range is 1 – 8 (1 being the most susceptible to wind erosion and 8 being the least susceptible). The WEG is low to moderate for the Project site which indicates a low to moderate susceptibility to erosion by wind.

Table 2 – WEG Rating by Soil Type

	Soil	Rating
163C	Kevin-Hillon clay loams, 2 to 8 percent slopes	6
376F	Hillon-Cabbart loams, 15 to 60 percent slopes	4

Suitabilities and Limitations for Use:

Soil Susceptibility to Compaction:

Soils identified within the Project footprint were identified as having a “medium” susceptibility to compaction. “Medium” indicates the “[p]otential for compaction is significant...After the initial compaction (i.e., the first equipment pass), these soils are able to support standard equipment with only minimal increases in soil density. The soils are intermediate between moisture insensitive and moisture sensitive” (Soil Survey of Choteau-Conrad Area; Parts of Teton and Pondera Counties, Montana).

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Not Likely to Adversely Effect. The Project has the potential to impact soils, however, given its low to moderate susceptibility to erosion and compaction, and the implementation of the BMP's described above, the Project is not expected to have negative cumulative effects on soil.

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.

Surface or Groundwater Resources:

The Project is located approximately 1.0 mile southeast of the confluence of the Two-Medicine River and Cut Bank Creek into the Marias River. There are no known water rights on Section 2 of T31N, R5W. For additional information see <http://wrqs.dnrc.mt.gov/default.aspx>.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Not Likely to Adversely Effect. It is unlikely that the Project will have an impact on the confluence of the Two Medicine River, Cut Bank Creek, and the Marias River through stormwater runoff since the Project is not proposing soil disturbance. Therefore, the Project is not expected to have negative cumulative effects on water quality.

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.

Air Quality:

There are no Nonattainment areas located on or near the Project, per the Environmental Protection Agency (EPA) Nonattainment area maps (NEPAssist, 2022). The proposed activities will not result in any new air emissions.

Determination:

No Effect. It is not anticipated that the Project would result in negative cumulative effects on air quality.

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.

Vegetative Community:

Vegetation around the Project site consists of native rangeland and contains Western Wheatgrass (*Pascopyrum smithii*), Green Needlegrass (*Nassella viridula*), Prairie Sandreed (*Calamovilfa longifolia*), Indian Ricegrass (*Oryzopsis hymenoides*), Blue Grama (*Bouteloua gracilis*), Sandberg Bluegrass (*Poa secunda sandbergii*), Prairie Junegrass (*Koeleria macrantha*), Threadleaf Sedge (*Carex filifolia*), Needle and Thread (*Hesperostipa comata*), Fringed Sagewort (*Artemisia frigida*), Silver Sagebrush (*Artemisia cana*), Western Snowberry (*Symphoricarpos occidentalis*), and various forbs. Noxious weeds were not identified within the Project footprint. The Natural Heritage Program database did not indicate any plant species of concern within T31N, R5W.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office. If disturbance occurs the recommended re-seeding mix will consist of 35% Western Wheatgrass (*Pascopyrum smithii*), 35% Slender Wheatgrass (*Elymus trachycaulus*), 15% Bluebunch Wheatgrass (*Pseudoroegneria spicata*), 10% Green Needlegrass (*Nassella viridula*), and 5% Lewis Blue Flax (*Linum lewisii*) or Purple Prairie Clover (*Dalea purpurea*). The mix shall be Certified Noxious Weed

Seed Free, drilled at a seeding rate of 8 lbs/acre Pure Live Seed (PLS), if broadcast seeding, poundage shall be doubled and harrowed, and seeding shall occur either in the fall (after September 15) or early spring (before May 1).

Determination:

Effect, Not Likely to Adversely Effect. Project activities are not expected to result in disturbance of the vegetative community within the Project footprint. The BMPs proposed above will mitigate any long-term adverse effects and therefore negative cumulative effects on vegetative resources are not expected.

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.

Habitat:

The Project site is not considered Critical Habitat per the EPA. The surrounding area provides habitat for a variety of big game species, predators, upland game birds, other non-game mammals, birds of prey, and various songbirds.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Not Likely to Adversely Effect. The Project has the potential to impact wildlife temporarily through the operation of heavy equipment during actual construction days. However, the Project will not impact wildlife forage, cover, or travel corridors. Nor will this action change the juxtaposition of wildlife forage, water, or hiding and thermal cover. Wildlife usage is expected to return to “normal” (pre-action usage) following the removal of the staging area. Overall, the Project is not expected to have negative cumulative effects on wildlife or 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.

Species of Concern/Threatened/Endangered:

Federally listed mammal species that occur in Montana include Black-footed Ferret (*Mustela nigripes*), Canada Lynx (*Lynx canadensis*), Grizzly Bear (*Ursus arctos horribilis*), and Northern Long-eared Bat (*Myotis septentrionalis*). Federally listed avian species that occur in Montana include Piping Plover (*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), Whooping Crane (*Grus americana*), and Yellow-billed Cuckoo (*Coccyzus americanus*). For additional information and additional species (fish, plants, & insects) see

<https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=MT&stateName=Montana&statusCategory=Listed>

The National Heritage Program database identifies the Golden Eagle (*Aquila chrysaetos*), Peregrine Falcon (*Falco peregrinus*), Spiny Softshell Turtle (*Apalone spinifera*), and Westslope Cuthroat Trout (*Oncorhynchus clarkii lewisi*) as a species of concern within T31N, R5W.

Wetlands:

The National Wetland Inventory (NWI) does not identify wetlands within or near the Project footprint but there is a Riverine Habitat with a classification code of R4SBC approximately 820 feet southeast. For a complete description of wetland classification codes, go to <https://www.fws.gov/wetlands/data/Mapper.html>.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Not Likely to Adversely Effect. The Project has the potential to impact wildlife temporarily through the operation of heavy equipment during actual construction days. However, the Project will not impact wildlife forage, cover, or travel corridors. Nor will this action change the juxtaposition of wildlife forage, water, or hiding and thermal cover. Wildlife usage is expected to return to "normal" (pre-action usage) following the removal of the staging area. NorthWestern Energy does not propose any soil disturbance just temporary storage and therefore the Project is not expected to impact wetlands through stormwater runoff of disturbed soils. Given the BMPs, the Project is not expected to have negative cumulative effects on wildlife or habitat.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

Historical and Archeological Sites:

DNRC staff inspected the area of potential effect (APE). This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards. It also entailed a pedestrian inventory of the proposed staging area. Although one previously recorded archaeological site (24PN24) is partially in the APE, no cultural remains are present.

Determination:

Project related developments are expected to have No Effect to Antiquities. If, however, previously unknown cultural or paleontological materials are identified during project related activities, all work will cease until a professional assessment of such resources can be made.

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.

Visual and Noise:

The Project is located approximately 11.50 miles north of Valier, Montana (population 530) and adjacent to Sullivan Bridge Road.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Not Likely to Adversely Effect. The Project has the potential to have visual and noise impacts to the public who utilize Sullivan Bridge Road. However, given that the Project is temporary, all Project materials will be removed after the Project is complete, and the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office, it is not expected to have cumulative impacts on aesthetics.

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 on environmental resources.

No Effect. The Project does not propose the use of limited natural resources and is not expected to have cumulative impacts on environmental resources.

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.

Surrounding land is owned by the state with a surface use of grazing under State Lease No. 6588. Any future development in the area will likely be restricted to utility or mineral development, with minimal impacts to the surface. Future development of projects are not expected to have negative cumulative effects.

IV. IMPACTS ON THE HUMAN POPULATION
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| <ul style="list-style-type: none">• <i>RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.</i>• <i>Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.</i>• <i>Enter "NONE" if no impacts are identified or the resource is not present.</i> |
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14. HUMAN HEALTH AND SAFETY:

Identify any health and safety risks posed by the project.

No Effect. Any risk to human health and safety will be restricted to NorthWestern personnel during the normal day-to-day operations of managing the storage area and it is assumed NorthWestern will abide by all Occupational Safety and Health Administration laws.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:

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

Land Use:

The current land use on which the staging area will be placed of consists of 243.53 grazing acres and 60 unsuitable acres.

Production:

The Project will benefit the Common School Trust in terms of a one-time easement fee of \$2,025.00. The Project will not impede the existing production of State Leases No. 6588.

BMPs:

NorthWestern Energy does not propose any soil disturbance just temporary storage. As part of the stipulations under the granted LUL, the DNRC will require NorthWestern Energy to re-seed any disturbed area with a seed mixture approved by the DNRC – Conrad Unit Office.

Determination:

Effect, Beneficial Effect. The Project is expected to increase production through a one-time incumbrance fee to the Common Schools Trust. The Project is not expected to have negative cumulative effects on future land use activities.

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.

Determination:

No Effect. The Project would not result in any new jobs nor eliminate any, therefore negative cumulative effects to the employment market are not expected.

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.

Revenues:

See **Section 15** above.

Determination:

Effect, Beneficial Effect. The Project is expected to increase production through a one-time incumbrance fee to the Common Schools Trust. The Project is not expected to have negative cumulative effects on taxes and/or 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

Demand for Government Services:

The Project is accessed by Sullivan Bridge Road. Additional government services (e.g. fire protection, police, schools, etc.) are not required for the installation of a staging area. This Project is of a small scale and being funded by NorthWestern Energy. There will be no excessive stress placed on the existing infrastructure of the area.

Determination:

No Effect. Future Project activities are not expected to impact traffic, increase demand for government services, or place excessive stress on the existing infrastructure of the area. Therefore, the Project is not expected to have negative cumulative effects on government services.

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.

Determination:

No Effect. The Project is in compliance with State and County laws. The Project will be granted under an LUL issued by the DNRC. No other management plans are in effect for the area.

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.

Legal Access and Recreation Opportunities:

The Project is located on legally accessible land via Sullivan Bridge Road. Recreation potential consists of hunting.

Determination:

No Effect. The Project will not result in any new permanent impacts to the surface of the land, impact access, or recreational opportunities. The Project is not expected to have negative cumulative effects on recreational and wilderness activities.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:

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

Determination:

No Effect. The Project will not require additional housing and is not expected to have negative cumulative effects on population and housing.

22. SOCIAL STRUCTURES AND MORES:

Identify potential disruption of native or traditional lifestyles or communities.

Social Structures:

The Project is not located within 10 miles of an Hutterite Colony and is approximately 0.50 mile east of the Blackfeet Nation. No archeological sites were identified within the Project footprint.

Determination:

No Effect. The Project is consistent with the surrounding land use, therefore, negative cumulative effects on native or traditional lifestyles or communities are not expected.

23. CULTURAL UNIQUENESS AND DIVERSITY:

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

Determination:

No Effect. The Project will not result in any new activities to occur in the area and therefore it is not expected to have negative cumulative effects on the unique quality of the 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 Project will benefit the Common School Trust in terms of a one-time easement fee of \$2,025.00. The Project will not impede the existing production of State Lease No. 6588.

Any future development in the area will likely be restricted to utility or mineral development, with minimal impacts to the surface. Future development of projects is not expected to have negative cumulative effects.

EA Checklist Prepared By:	Name: Michaela Hanson	Date: 7/20/2022
	Title: Land Use Specialist, Conrad Unit, Central Land Office	

V. FINDINGS

25. ALTERNATIVE SELECTED:

Alternative B (the Proposed action) – Grant NorthWestern Energy the requested LUL and permission to install the temporary staging area.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

No significant impacts are expected. The Project will not result in any permanent impacts to the surface and therefore no cumulative or significantly adverse effects are expected..

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

EIS

More Detailed EA

No Further Analysis

EA Checklist Approved By:	Name: Erik Eneboe
	Title: Conrad Unit Manager, CLO, DNRC
Signature: 	Date: July 20, 2022

Exhibit A
Project Location Map

NorthWestern Energy Staging Area



Legend

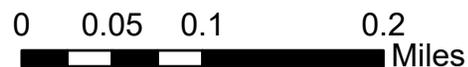
-  Ag & Grazing Lease
-  Surface Tracts
-  PLSS Township
-  Staging Area

Lease: 6588
 Lessee: Edward McCauley
 STRID: NW4SE4, T31N, R5W, 2

Vicinity Map



Exhibit A Project Location Map



Author:
 Michaela Hanson

7/20/2022