

CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	Draggin Iron Ranch Water line
Proposed Implementation Date:	October 2026
Proponent:	Draggin Iron Ranch
Location:	W2 Sec. 36 T18N R22E
County:	Fergus
Trust:	Common Schools

I. TYPE AND PURPOSE OF ACTION

This action would authorize the installation and operation of a livestock water pipeline on Montana State Trust Lands, including all associated construction, maintenance, and use activities.

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 Department of Natural Resources and Conservation (DNRC)
Northeastern Land Office (NELO) & Lewistown Unit Office
Proponent: Draggin Iron Ranch
Surface Lessees: Draggin Iron Ranch
Other: Montana Sage Grouse Oversight Team (MSGOT)

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

The DNRC and its Northeastern Land Office (NELO) have jurisdiction over the proposed project.

The proponent is responsible for acquiring all necessary permits for the proposed project and settling all surface damage with the surface lessees.

3. ALTERNATIVES CONSIDERED:

Alternative A (No Action) – Under this alternative, the Department does not grant permission for construction maintenance and use of a stock water pipeline.

Alternative B (the Proposed Action) – The Department would grant permission for the construction, maintenance, and use of a stock water pipeline.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

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

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

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

The soils in the project area are classified as being *somewhat limited* for *shallow excavation*. The limitation for shallow excavation may affect trenching techniques, but no long-term soil degradation is expected. All disturbed areas will be reclaimed and reseeded using the seed mix specified in Appendix B. With these mitigation measures in place, no significant adverse effects to soils are anticipated.

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.

This project will improve the distribution of stock water in a very dry area primarily used for cattle grazing. No additional water will be made available for use on State Trust Lands. No significant impacts to local or regional water resources are anticipated.

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.

No significant impacts to air quality are anticipated from this project.

7. VEGETATION COVER, QUANTITY AND QUALITY:

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

The project will result in minor disturbance to approximately 2.23 acres of vegetation. Disturbed areas will be reseeded using the seed mix specified in Appendix B. No rare plants or unique cover types are present within the project area. Therefore, no significant impacts to vegetation are anticipated.

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 project area supports a variety of wildlife, including resident and migratory species associated with grasslands, sagebrush, wetlands, riparian areas, and forested habitats. Key species observed or known to occur in the area include greater sage-grouse (*Centrocercus urophasianus*), burrowing mammals such as black-tailed prairie dogs (*Cynomys ludovicianus*), and a range of migratory songbirds, raptors, and bat species.

Potential habitat disturbance will be minimized by restricting construction to dry periods, limiting equipment to designated work areas, and reclaiming disturbed vegetation per Appendix B. No significant long-term impacts to terrestrial, avian, or aquatic habitats are anticipated.

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.

Several species of concern are present in the project area, including sage-grouse in Core Habitat and lek buffer areas, as well as other migratory and resident species dependent on sagebrush, grassland, riparian, and

forested habitats. Mitigation measures, including timing construction after July 15 and before March 15th, minimizing soil disturbance, and restoring native vegetation, are expected to prevent significant impacts.

A complete species list, including habitat and distribution data, is provided in Appendix C. Temporary displacement of wildlife may occur during construction, but no significant long-term impacts to unique, endangered, or sensitive species are anticipated.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

A Class I (literature review) level assessment was conducted by the DNRC staff archaeologist for the Area of Potential Effect (APE). This review included inspection of project maps, the DNRC sites/sites leads database, land use records, General Land Office Survey Plats, and control cards. The Class I assessment revealed that no antiquities have been identified within the APE. No additional archaeological investigations are planned in association with this proposed development. However, if previously unknown cultural or paleontological materials are discovered during project activities, all work will cease until a professional assessment of the resources can be conducted.

No significant effects on historical, archaeological, or paleontological resources are anticipated.

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.

No significant impacts on visual or aesthetic qualities are anticipated.

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.

No limited environmental resources are expected to be significantly impacted by this project. Additionally, the project will not contribute to any significant cumulative demands 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.

There are no other projects or plans currently being considered on the tracts identified in this EA Checklist.

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.

During construction, equipment operation may pose temporary hazards. The proponent will be responsible for implementing mitigation measures. No ongoing hazards are anticipated following construction.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:

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

The project will not alter existing industrial, agricultural, or commercial activities in the area.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:

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

The project will not create or eliminate jobs. No significant effects on the employment market are anticipated.

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.

The project will not have direct or cumulative effects on 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

The project will not result in significant increases in traffic or demand for government services such as schools, fire, or police 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.

There are no zoning regulations or agency management plans that would affect this project.

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

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

The project will not significantly affect access to, or the quality of, recreation 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

The project will not affect population density or housing demand.

22. SOCIAL STRUCTURES AND MORES:

Identify potential disruption of native or traditional lifestyles or communities.

The project will not significantly affect native, traditional, or community lifestyles.

23. CULTURAL UNIQUENESS AND DIVERSITY:

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

The project will not significantly affect cultural uniqueness 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.

This license will generate a one-time fee of \$200.00 payable to the School Trust. No significant cumulative economic or social effects are anticipated.

V. FINDING**25. ALTERNATIVE SELECTED:**

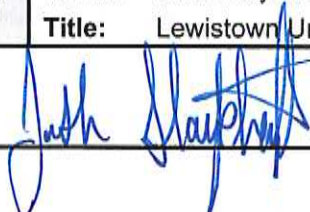
Alternative B (Proposed Action): The Department will grant permission for construction, maintenance, and use of a stock water pipeline.

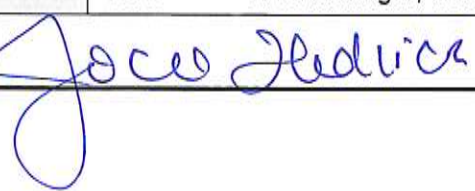
26. SIGNIFICANCE OF POTENTIAL IMPACTS:

After evaluating potential environmental effects, it is determined that the project will not result in significant impacts to the environment.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

☐ EIS ☐ More Detailed EA ☒ No Further Analysis

EA Checklist Prepared By:	Name: Josh Stoychoff
	Title: Lewistown Unit Manager
Signature:	 Date: 9/28/26

EA Checklist Approved By:	Name: Jocee Hedrick
	Title: Area Manager, Northeastern Land Office
Signature:	 Date: 9/28/26

Appendix A: Soil Ratings

Table - Shallow Excavations - Summary by Rating Value				
Summary by Rating Value				
Summary by Rating Value	Rating	Acres in AOI	Percent of AOI	
Very limited		584.8	67.3%	
Somewhat limited		284.7	32.7%	
Totals for Area of Interest		869.5	100.0%	

Appendix B: Reclamation Seed Mix

Species	% of Seed mix	Pounds PLS/ac
Western Wheatgrass	35	2.8
Slender wheatgrass	35	2.8
Bluebunch Wheatgrass	15	1.2
Green Needlegrass	10	0.8
Lewis flax or purple prairie clover	5	0.4

Appendix C: Species of Concern

Observed SOC:

MT Stat	Species	Gr	Sort	Or	Invasive	Gr	Doc	ELCODE	Common Name	Scientific Name	Habitat	Distribution	Global Rank	MT State R
SOC	Birds		2					Oth ABNLC12010	Greater Sage-Grouse	Centrocercus urophasianus	Sagebrush	Resident Year Round	G3	S2
SOC	Birds		2					Oth ABNHF07070	Long-billed Curlew	Numenius americanus	Grasslands	Migratory Summer Br	G4	S3B
SOC	Birds		2					Oth ABPBX94040	Brewer's Sparrow	Spizella breweri	Sagebrush	Migratory Summer Br	G5	S3B
SOC	Birds		2					Oth ABPBK04010	Sage Thrasher	Oreoscoptes montanus	Sagebrush	Migratory Summer Br	G4	S3B
SOC	Birds		2					Oth ABPBXA0010	Baird's Sparrow	Centronyx bairdii	Grasslands	Migratory Summer Br	G4	S3B
SOC	Birds		2					Oth ABPBXA9010	Bobolink	Dolichonyx oryzivorus	Moist grasslands	Migratory Summer Br	G5	S3B

Potential SOC:

MT Stat	Species	Gr	Sort	Or	Invasive	Gr	Doc	ELCODE	Common Name	Scientific Name	Habitat	Distribution	Global R	MT State R
SOC	Mammals		1					Oth AMABA01230	Merriam's Shrew	Sorex merriami	Sagebrush grassland	Resident Year Round	G4	S3
SOC	Mammals		1					Oth AMAFB06010	Black-tailed Prairie Dog	Cynomys ludovicianus	Grasslands	Resident Year Round	G4	S3
SOC	Mammals		1					Oth AMABA01030	Preble's Shrew	Sorex preblei	Sagebrush grassland	Resident Year Round	G4	S3
SOPC	Vascular P		7					Oth POCHE04090	Four-wing Saltbush	Atriplex canescens	Sagebrush steppe an	Present	G5	S4
SOC	Birds		2					Oth ABNHB03100	Mountain Plover	Anarhynchus montanus	Grasslands	Migratory Summer Br	G3	S2B
SOC	Birds		2					Oth ABNSB10010	Burrowing Owl	Athene cunicularia	Grasslands	Migratory Summer Br	G4	S3B
SOC	Birds		2					Oth ABPBM02060	Sprague's Pipit	Anthus spragueii	Grasslands	Migratory Summer Br	G3G4	S3B
SOC	Birds		2					Oth ABPBXA6010	Thick-billed Longspur	Rhynchophanes mccownii	Grasslands	Migratory Summer Br	G4	S3B
SOPC	Birds		2					Oth ABPBRX65010	Dickcissel	Spiza americana	Grasslands	Migratory Rare Summ	G5	S4B
SOC	Invertebra		6					Oth IHVM24260	American Bumble Bee	Bombus pensylvanicus	Fields, farmland, gras	Resident Year Round	G3G4	S3
SOC	Mammals		1					Oth AMACC01010	Little Brown Myotis	Myotis lucifugus	Generalist	Resident Year Round	G3G4	S2S3
SOPC	Mammals		1					Oth AMABA01280	Prairie Shrew	Sorex haydeni	Grasslands	Resident Year Round	G5	S3S4
SOC	Vascular P		7					Oth PDORS1B1E0	Platte Cinquefoil	Potentilla plattensis	Grasslands/Sagebrush	Present	G4	S3
SOC	Birds		2					Oth ABPBXA6040	Chestnut-collared Longsp	Calcarius ornatus	Grasslands	Migratory Summer Br	G5	S2B
SOC	Vascular P		7					Oth PDAST9H1S8	Scribner's Ragwort	Senecio integerrimus var. s	Sagebrush shrubland	Present	G5T2T3	S2S3

MONTANA SAGE GROUSE HABITAT CONSERVATION PROGRAM



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

STATE OF MONTANA

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Project No. 7552
Governor's Executive Orders 12-2015 and 21-2015
Draggin Iron Waterline

Joshua Stoychoff
Montana Department of Natural Resources and Conservation (DNRC)
613 NE Main Street
Lewistown, MT 59457

September 24, 2026

Dear Mr. Stoychoff

The Montana Sage Grouse Habitat Conservation Program (Program) received a request for consultation and review of your proposed project on September 8, 2026. Additional information necessary for Program review was received on September 23, 2026. Based on the information provided, all or a portion of this project is located within a Core Area Habitat for sage grouse. The Bureau of Land Management (BLM) classifies this area as a Priority Habitat Management Area (PHMA).

Executive Orders 12-2015 and 21-2015 set forth Montana's Sage Grouse Conservation Strategy. Montana's goal is to maintain viable sage grouse populations and conserve habitat so that Montana maintains flexibility to manage our own lands, our wildlife, and our economy and ensure that a listing under the federal Endangered Species Act is not warranted in the future.

The Program has completed its review, including:

Project Description:

Project Type: Agriculture - Water

Project Disturbance: 0.36-Mile-Long buried Water Pipeline

Construction Timeframe: October 1, 2026 to October 10, 2026; Temporary (<1 Year)

Operations Timeframe: October 11, 2026; Permanent (>25 Years)



Hosted by the Montana Department of Natural Resources and Conservation
Director's Office: (406) 444-2074



Project Location:

Legal: Township 18 North, Range 22 East, Section 36

County: Fergus

Ownership: State Trust Lands, Private

Project Description and Executive Orders 12-2015 and 21-2015 Consistency:

The Draggin Iron Waterline project proposes to install a buried water line in a designated Core Area for sage grouse.

Joshua Stoychoff with DNRC, on behalf of the Landowner, proposes to install a buried water line approximately 16.97 miles north of Grass Range, Montana in Fergus County. See Figure 1 (Draggin Iron Waterline Project Location Map). The water line will be used to connect an existing livestock watering system to a water well.

To implement the project, a backhoe or related machinery will be used to create a trench for the 0.36-mile-long pipeline from an existing livestock watering system to a water well. The trench will then be backfilled once the pipeline is installed. No reclamation is anticipated for this project.

Based on the information you provided, your project is 0.91 miles from the nearest active sage grouse lek in a Core Area and within the No Surface Occupancy of one sage grouse lek in a Core Area. The Landowner will be starting and completing this project outside of the seasonal use time period of March 15 – July 15.

Density Disturbance Calculation Tool (DDCT) Analysis

The proposed project is to occur in a designated Core Area for sage grouse. The Program has calculated the density and disturbance levels within the project area using a Density Disturbance Calculation Tool. The results were compared to allowable thresholds set forth in the Executive Order 12-2015. Your project results are as follows. See Figure 3 (Project Name DDCT Analysis Area Map) and the Density Disturbance Calculation Tool Explanation and Results Summary in the enclosed Mitigation Plan.

DDCT Analysis Area Acres: 65,848.75
Total Preliminary Disturbance Acres: 0.43
Total Disturbed Acres in Analysis Area: 12,559.78
DDCT Result: 19.07%
New Disturbed Acres: 0.43
Affected Leks Within the DDCT Analysis Area: 11



Discussion:

The Draggin Iron Waterline project entails installing a 0.36-mile-long buried water pipeline. The purpose of this project is in support of livestock grazing and long-term improvements in range health.

The DDCT result for this project exceeds the 5% threshold due to the existing cultivated lands within the DDCT Analysis Area. However, on August 31, 2017, the Montana Sage Grouse Oversight Team (MSGOT) endorsed an interagency approach to range improvement projects so that range improvement projects will not be required to adhere to the 5% disturbance cap limits where the improvement project or habitat restoration / enhancement project is short term, impacts are temporary, and benefits to habitat can be documented.

Individual projects are still reviewed by the Program, as appropriate, for BLM, State Trust Lands, or Natural Resource Conservation Service (NRCS) projects. All stipulations of Executive Order 12-2015 are otherwise applicable.

Accordingly, the Program had to analyze whether this range improvement project is short term, impacts are temporary, and benefits to habitat can be documented.

Here, the Program determined that the criteria for not requiring this particular range improvement project to adhere to the 5% disturbance cap have been met, as indicated below.

- The pipelines will be installed using a trencher. The narrow surface disturbance will be reclaimed within one growing season.
- Construction activity will take place outside of lekking, nesting, and brood rearing seasons for sage grouse. This is consistent with the seasonal and time of day stipulations.
- The DDCT analysis area includes a large percentage of land that has already been cultivated.

Livestock grazing is the most widespread type of land use across the sagebrush biome. Although improper livestock management, as determined by local ecological conditions, may have negative impacts on sage grouse seasonal habitats, proper livestock management is a critical tool for providing and maintaining high quality sage grouse habitat.

Water pipelines and stock tanks can distribute livestock across the landscape in ways that avoid surface disturbance and provide conservation gain. Surface disturbance and the disruptive activities associated with installation are temporary, and vegetation should recover in one growing season. To be consistent with Executive Order 12-2015, projects should follow seasonal timing and NSO stipulations. When properly implemented, these projects will have long-term benefits.



Recommendations intended to support grazing management as a tool for providing quality sage grouse habitat are described in Executive Order 12-2015, Attachment G. Distribution of water to livestock can directly facilitate these recommendations by:

- rotating livestock to different pastures, while resting others to establish a diversity of habitat types;
- changing seasons of use within pastures to ensure all plants can reproduce; leaving residual cover (grass from the past season) to increase hiding and nesting cover for sage grouse;
- managing the frequency and intensity of grazing to sustain native grasses, wildflowers, and shrubs; and
- managing livestock access to water to ensure healthy livestock and healthy watersheds.

Program Recommendations:

The following stipulations are taken from Montana Executive Order 12-2015. These stipulations are designed to maintain existing levels of suitable sage grouse habitat by managing uses and activities in sage grouse habitat to ensure the maintenance of sage grouse abundance and distribution in Montana. Development should be designed and managed to maintain populations and sage grouse habitats.

- Surface Occupancy: Within 0.6 miles of the perimeter of an active sage grouse leks there will be no surface occupancy (NSO) for new activities. No surface facilities including roads shall be placed within the NSO Area.
- Reclamation should re-establish native grasses, forbs, and/or shrubs during interim and final reclamation. The goal of reclamation is to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to the benefit of sage grouse and replace or enhance sage grouse habitat to the degree that environmental conditions allow.
- Weed management is required within a Core Area for sage grouse. Reclamation of disturbed areas must include control of noxious weeds and invasive plant species, including cheatgrass (*Bromus tectorum*) and Japanese brome (*Bromus japonicas*).

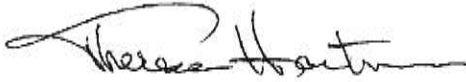
Your activities are consistent with the Montana Sage Grouse Conservation Strategy. Your proposed project or activity may need to obtain additional permits or authorization from other Montana state agencies or possibly federal agencies. They are very likely to request a copy of this consultation letter, so please retain it for your records.

If the location or boundaries of your proposed project or activity change in the future, or if new activities are proposed within one of the designated sage grouse habitat areas, please visit <https://sagegrouse.mt.gov/> and submit the new information.



Thanks for your interest in sage grouse and your commitment to taking the steps necessary to ensure Montana's Sage Grouse Conservation Strategy is successful.

Sincerely,



Therese Hartman
Montana Sage Grouse Habitat Conservation Program Manager

Enclosures:

1. Figure 1. Draggin Iron Waterline Project Location Map
2. Figure 2. Draggin Iron Waterline Project Map and Density Disturbance Calculation Tool Explanation and Results Summary

cc: Shawn Thomas
DNRC-Forestry-Trust Land Division Administrator
P.O. Box 201601
Helena, MT 59620-1601



Figure 1

7552_Draggin Iron Waterline Project Location

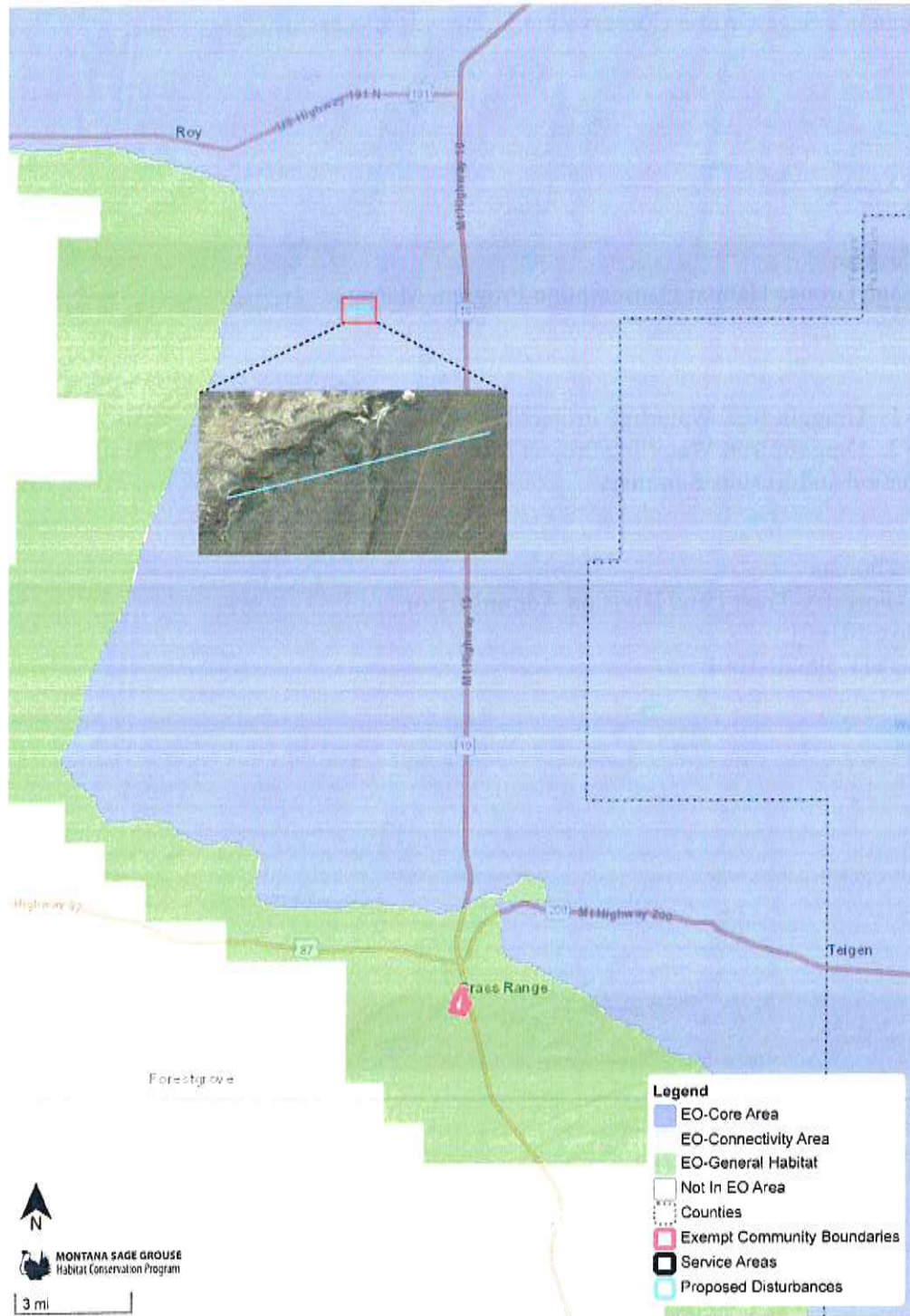
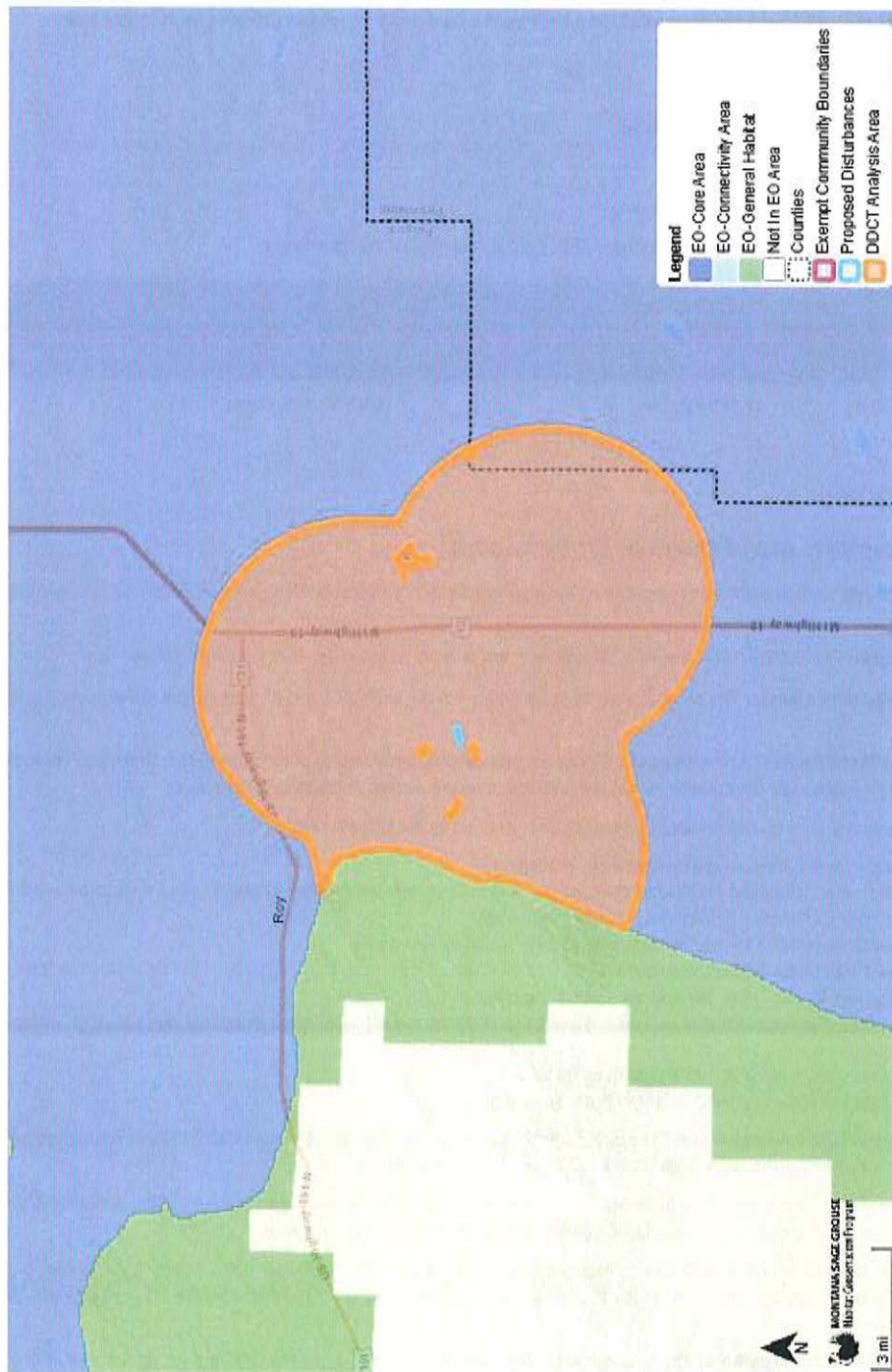




Figure 2

7552_Draggin Iron Waterline Project DDCT Map



Density Disturbance Calculation Tool Explanation and Results

[#7552] Draggin Iron Waterline

Created on 09-25-2026 8:16 AM

Project stage changed from Due Diligence to Information Request.

Results are based on the data submitted by the proponent. DDCT calculation results are as follows.

DDCT Analysis Area	Proposed Disturbances Area	Existing + Proposed Disturbances Area within DDCT Analysis Area	DDCT Result	New disturbed acres	Affected Leks within the DDCT Analysis Area
65,648.75 acres	0.43 acres	12,559.78 acres	19.07%	0.43 acres	11

Result calculated on 09-25-2026 8:16 AM

Analysis Process and General Definitions

Existing Disturbances: All surface disturbances existing on the ground prior to any Proposed Disturbances that would be created by a new project.

Preliminary Disturbances: All surface disturbances associated with this project, as submitted to the Projects On-line Tool.

Total Preliminary Disturbance Acres: The number of acres contained within the entire polygon(s) delineating the disturbance area of this proponent's project.

Previously Proposed Disturbances: All Preliminary Disturbances proposed by other people prior to the current Preliminary Disturbance being submitted. Once a Preliminary Disturbance is finalized, the disturbance becomes an Existing Disturbance.

DDCT Analysis Area Acres: The number of acres within a polygon created by the following steps:

1. Map the *Preliminary Disturbance* polygon submitted by proponent.
2. Classify the habitat where proposed *Preliminary Disturbance* would occur: core area, general habitat, connectivity area, outside the Executive Order (none of the above). May include unsuitable habitat.
3. Buffer *Preliminary Disturbance*'s that would only occur in core habitat by four miles.
4. Look to see if the 4-mile buffer includes any active leks.
5. If yes, buffer those leks by four miles and add the acres to the polygon.
6. Remove any portion of the polygon that is not classified as core habitat so the DDCT Analysis Area only contains acres in core habitat.
7. Finalize the polygon. This is the DDCT Analysis Area polygon.
8. Calculate the number of acres in the DDCT analysis area polygon.

Total Disturbed Acres in DDCT Analysis Area: The total number of acres of disturbance within the DDCT Analysis Area polygon: all Existing Disturbances + Previously Proposed Disturbances + current Preliminary Disturbance.

DDCT Result: The Total Disturbed in DDCT Analysis Area acres divided by the DDCT Analysis Area acres x 100 to determine the percent disturbance which is compared to Executive Order 12-2015 5% disturbance threshold for core areas.

New Disturbed Acres: the total of new ground disturbance as a result of the project. This is portion of Preliminary Disturbances that do not overlap with already Existing Disturbances or Previously Proposed Disturbances. Acres are calculated from the resulting polygon, which is all new ground disturbance.

Affected Leks within DDCT Analysis Area: The total number of leks where any portion of the No Surface Occupancy area is within the DDCT Analysis Area.

Lek Distances: The shortest distance between the Preliminary Disturbance and any active leks with 4 miles of the Preliminary Disturbance.



MONTANA SAGE GROUSE HABITAT CONSERVATION PROGRAM



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

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Project No. 7552
Governor's Executive Orders 12-2015 and 21-2015
Draggin Iron Waterline

Joshua Stoychoff
Montana Department of Natural Resources and Conservation (DNRC)
613 NE Main Street
Lewistown, MT 59457

September 24, 2026

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County: Fergus

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To implement the project, a backhoe or related machinery will be used to create a trench for the 0.36-mile-long pipeline from an existing livestock watering system to a water well. The trench will then be backfilled once the pipeline is installed. No reclamation is anticipated for this project.

Based on the information you provided, your project is 0.91 miles from the nearest active sage grouse lek in a Core Area and within the No Surface Occupancy of one sage grouse lek in a Core Area. The Landowner will be starting and completing this project outside of the seasonal use time period of March 15 – July 15.

Density Disturbance Calculation Tool (DDCT) Analysis

The proposed project is to occur in a designated Core Area for sage grouse. The Program has calculated the density and disturbance levels within the project area using a Density Disturbance Calculation Tool. The results were compared to allowable thresholds set forth in the Executive Order 12-2015. Your project results are as follows. See Figure 3 (Project Name DDCT Analysis Area Map) and the Density Disturbance Calculation Tool Explanation and Results Summary in the enclosed Mitigation Plan.

DDCT Analysis Area Acres: 65,848.75
Total Preliminary Disturbance Acres: 0.43
Total Disturbed Acres in Analysis Area: 12,559.78
DDCT Result: 19.07%
New Disturbed Acres: 0.43
Affected Leks Within the DDCT Analysis Area: 11



Discussion:

The Draggin Iron Waterline project entails installing a 0.36-mile-long buried water pipeline. The purpose of this project is in support of livestock grazing and long-term improvements in range health.

The DDCT result for this project exceeds the 5% threshold due to the existing cultivated lands within the DDCT Analysis Area. However, on August 31, 2017, the Montana Sage Grouse Oversight Team (MSGOT) endorsed an interagency approach to range improvement projects so that range improvement projects will not be required to adhere to the 5% disturbance cap limits where the improvement project or habitat restoration / enhancement project is short term, impacts are temporary, and benefits to habitat can be documented.

Individual projects are still reviewed by the Program, as appropriate, for BLM, State Trust Lands, or Natural Resource Conservation Service (NRCS) projects. All stipulations of Executive Order 12-2015 are otherwise applicable.

Accordingly, the Program had to analyze whether this range improvement project is short term, impacts are temporary, and benefits to habitat can be documented.

Here, the Program determined that the criteria for not requiring this particular range improvement project to adhere to the 5% disturbance cap have been met, as indicated below.

- The pipelines will be installed using a trencher. The narrow surface disturbance will be reclaimed within one growing season.
- Construction activity will take place outside of lekking, nesting, and brood rearing seasons for sage grouse. This is consistent with the seasonal and time of day stipulations.
- The DDCT analysis area includes a large percentage of land that has already been cultivated.

Livestock grazing is the most widespread type of land use across the sagebrush biome. Although improper livestock management, as determined by local ecological conditions, may have negative impacts on sage grouse seasonal habitats, proper livestock management is a critical tool for providing and maintaining high quality sage grouse habitat.

Water pipelines and stock tanks can distribute livestock across the landscape in ways that avoid surface disturbance and provide conservation gain. Surface disturbance and the disruptive activities associated with installation are temporary, and vegetation should recover in one growing season. To be consistent with Executive Order 12-2015, projects should follow seasonal timing and NSO stipulations. When properly implemented, these projects will have long-term benefits.



Recommendations intended to support grazing management as a tool for providing quality sage grouse habitat are described in Executive Order 12-2015, Attachment G. Distribution of water to livestock can directly facilitate these recommendations by:

- rotating livestock to different pastures, while resting others to establish a diversity of habitat types;
- changing seasons of use within pastures to ensure all plants can reproduce; leaving residual cover (grass from the past season) to increase hiding and nesting cover for sage grouse;
- managing the frequency and intensity of grazing to sustain native grasses, wildflowers, and shrubs; and
- managing livestock access to water to ensure healthy livestock and healthy watersheds.

Program Recommendations:

The following stipulations are taken from Montana Executive Order 12-2015. These stipulations are designed to maintain existing levels of suitable sage grouse habitat by managing uses and activities in sage grouse habitat to ensure the maintenance of sage grouse abundance and distribution in Montana. Development should be designed and managed to maintain populations and sage grouse habitats.

- Surface Occupancy: Within 0.6 miles of the perimeter of an active sage grouse leks there will be no surface occupancy (NSO) for new activities. No surface facilities including roads shall be placed within the NSO Area.
- Reclamation should re-establish native grasses, forbs, and/or shrubs during interim and final reclamation. The goal of reclamation is to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to the benefit of sage grouse and replace or enhance sage grouse habitat to the degree that environmental conditions allow.
- Weed management is required within a Core Area for sage grouse. Reclamation of disturbed areas must include control of noxious weeds and invasive plant species, including cheatgrass (*Bromus tectorum*) and Japanese brome (*Bromus japonicas*).

Your activities are consistent with the Montana Sage Grouse Conservation Strategy. Your proposed project or activity may need to obtain additional permits or authorization from other Montana state agencies or possibly federal agencies. They are very likely to request a copy of this consultation letter, so please retain it for your records.

If the location or boundaries of your proposed project or activity change in the future, or if new activities are proposed within one of the designated sage grouse habitat areas, please visit <https://sagegrouse.mt.gov/> and submit the new information.



Thanks for your interest in sage grouse and your commitment to taking the steps necessary to ensure Montana's Sage Grouse Conservation Strategy is successful.

Sincerely,



Therese Hartman
Montana Sage Grouse Habitat Conservation Program Manager

Enclosures:

1. Figure 1. Draggin Iron Waterline Project Location Map
2. Figure 2. Draggin Iron Waterline Project Map and Density Disturbance Calculation Tool Explanation and Results Summary

cc: Shawn Thomas
DNRC-Forestry-Trust Land Division Administrator
P.O. Box 201601
Helena, MT 59620-1601



Figure 1

7552_Draggin Iron Waterline Project Location

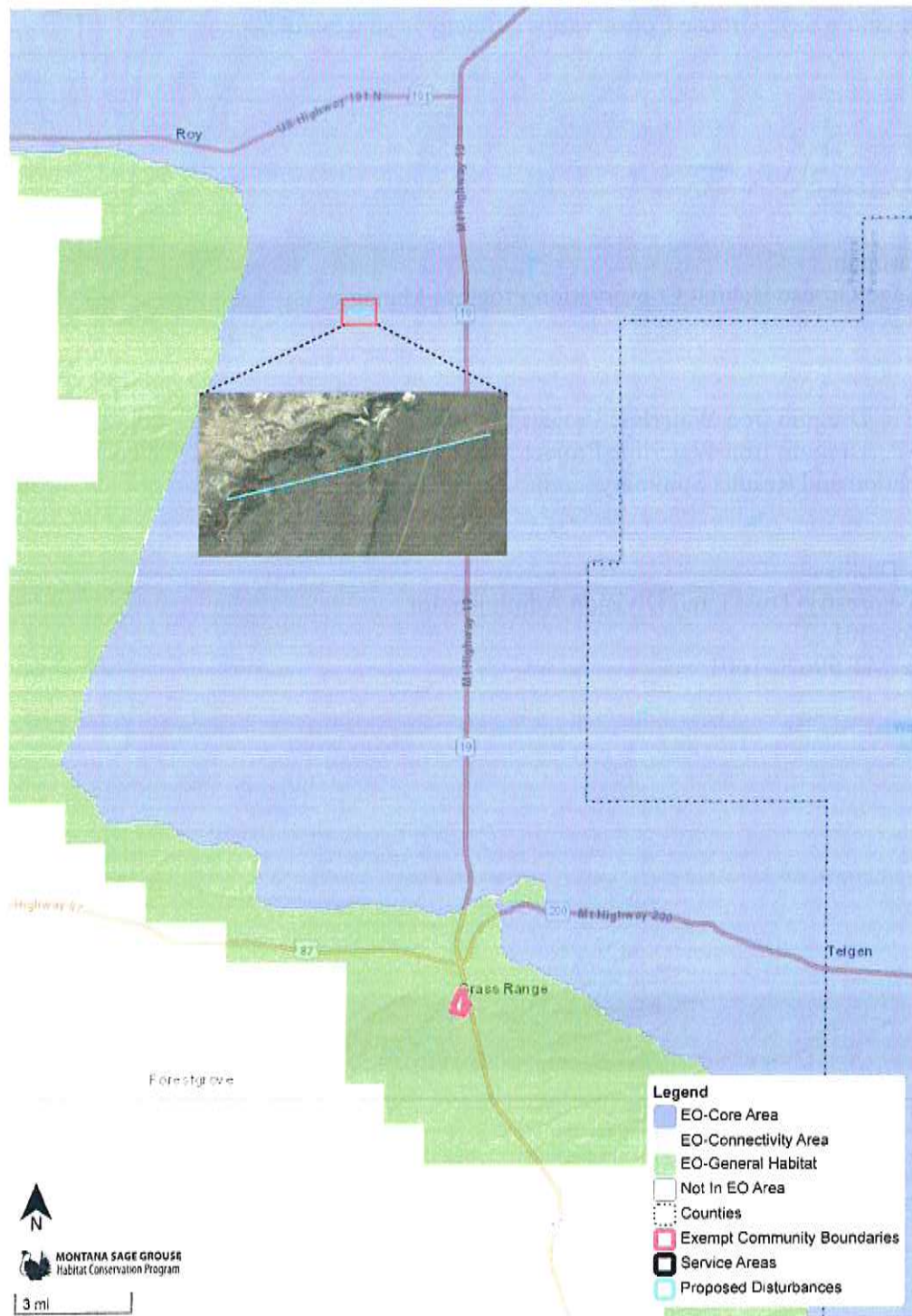
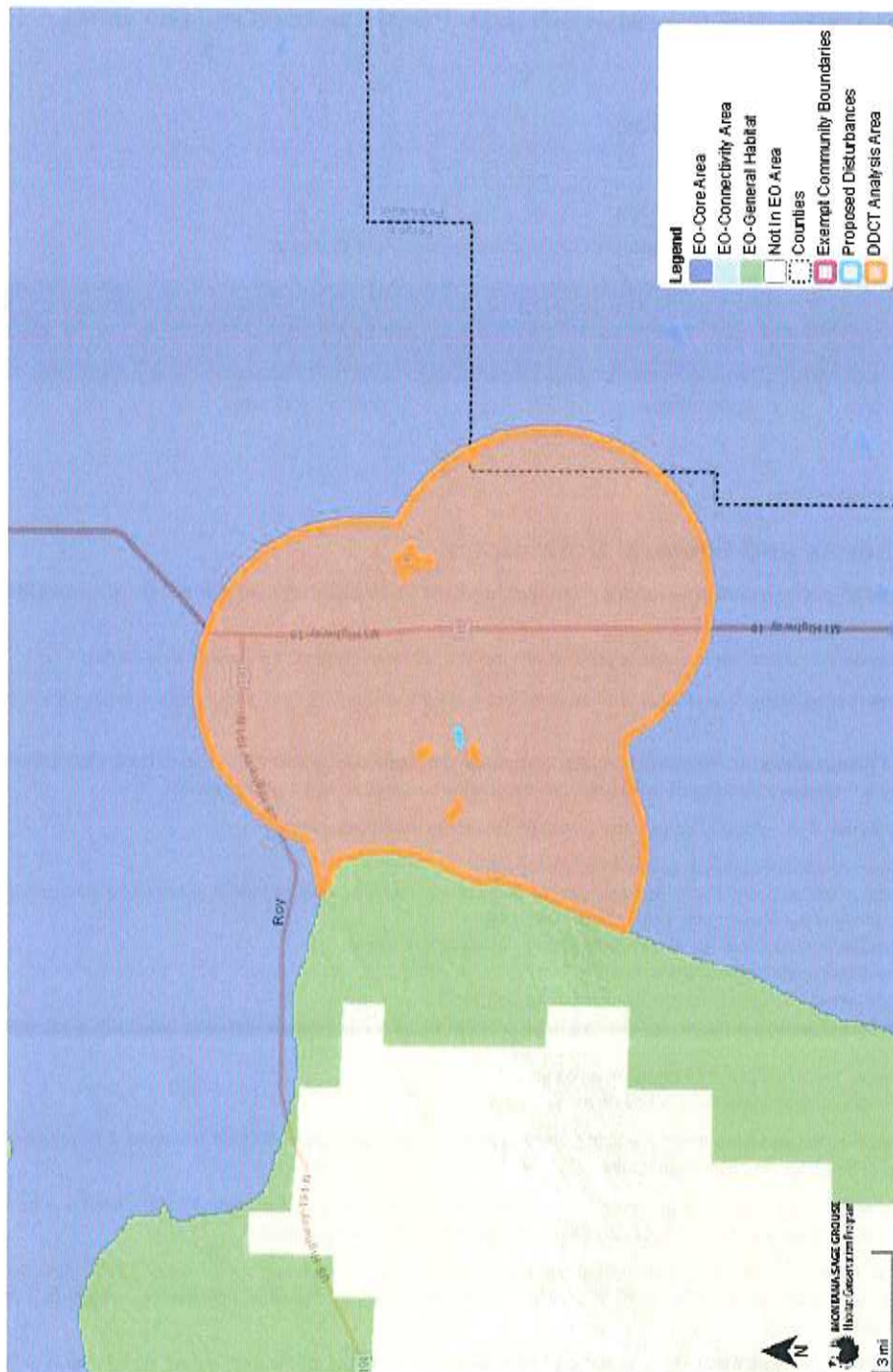




Figure 2

7552_Draggin Iron Waterline Project DDCT Map



Density Disturbance Calculation Tool Explanation and Results

[#7552] Draggin Iron Waterline

Created on 09/25/2026 8:16 AM

Project stage changed from Due Diligence to Information Request.

Results are based on the data submitted by the proponent. DDCT calculation results are as follows:

DDCT Analysis Area	Proposed Disturbances Area	Existing + Proposed Disturbances Area within DDCT Analysis Area	DDCT Result	New disturbed acres	Affected Leks within the DDCT Analysis Area
65,648.75 acres	0.43 acres	12,559.76 acres	19.07%	0.43 acres	11

Result calculated on 09/25/2026 8:16 AM

Analysis Process and General Definitions

Existing Disturbances: All surface disturbances existing on the ground prior to any Proposed Disturbances that would be created by a new project.

Preliminary Disturbances: All surface disturbances associated with this project, as submitted to the Projects On-line Tool.

Total Preliminary Disturbance Acres: The number of acres contained within the entire polygon(s) delineating the disturbance area of this proponent's project.

Previously Proposed Disturbances: All Preliminary Disturbances proposed by other people prior to the current Preliminary Disturbance being submitted. Once a Preliminary Disturbance is finalized, the disturbance becomes an Existing Disturbance.

DDCT Analysis Area Acres: The number of acres within a polygon created by the following steps:

1. Map the *Preliminary Disturbance* polygon submitted by proponent.
2. Classify the habitat where proposed *Preliminary Disturbance* would occur: core area, general habitat, connectivity area, outside the Executive Order (none of the above). May include unsuitable habitat.
3. Buffer *Preliminary Disturbance*'s that would only occur in core habitat by four miles.
4. Look to see if the 4-mile buffer includes any active leks.
5. If yes, buffer those leks by four miles and add the acres to the polygon.
6. Remove any portion of the polygon that is not classified as core habitat so the DDCT Analysis Area only contains acres in core habitat.
7. Finalize the polygon. This is the DDCT Analysis Area polygon.
8. Calculate the number of acres in the DDCT analysis area polygon.

Total Disturbed Acres in DDCT Analysis Area: The total number of acres of disturbance within the DDCT Analysis Area polygon: all Existing Disturbances + Previously Proposed Disturbances + current Preliminary Disturbance.

DDCT Result: The Total Disturbed in DDCT Analysis Area acres divided by the DDCT Analysis Area acres x 100 to determine the percent disturbance which is compared to Executive Order 12-2015 5% disturbance threshold for core areas.

New Disturbed Acres: the total of new ground disturbance as a result of the project. This is portion of Preliminary Disturbances that do not overlap with already Existing Disturbances or Previously Proposed Disturbances. Acres are calculated from the resulting polygon, which is all new ground disturbance.

Affected Leks within DDCT Analysis Area: The total number of leks where any portion of the No Surface Occupancy area is within the DDCT Analysis Area.

Lek Distances: The shortest distance between the Preliminary Disturbance and any active leks with 4 miles of the Preliminary Disturbance.

