CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name: Ennis Airport Rd. Testing

Proposed Implementation Date: June 2025
Proponent: Am

Location: NW4, N2SW4 Section 36, Township 6S, Range 1W
County: Madison
Trust: Common Schools

Introduction: In January of 2025, the Minerals Management Bureau of the Forestry and Trust Lands Division of the Montana DNRC, completed a programmatic environmental analysis for aggregate testing. The programmatic environmental analysis goes into further detail and evaluates a wider scope of resources than this checklist environmental assessment. This checklist environmental assessment should be read and understood in conjunction with the programmatic environmental analysis. The programmatic environmental assessment can be found on the Departments website at: https://dnrc.mt.gov/TrustLand/subsurface-resources/Aggregate-Testing-Programmatic-EA-FINAL.pdf

I. TYPE AND PURPOSE OF ACTION

On May 14, 2025, AM Welles applied to the Department of Natural Resources for the ability to test aggregate resources on State of Montana Trust Lands. The application was made for the W2 of Section 36, Township 6S, Range 1W. However, the State of Montana Trust Lands does not own the S2 of the SW4 of this section. Zack Winfield, Petroleum Engineer MMB contacted the applicant and asked if they were okay with amending the application to the NW4 and the N2SW4 of section 36, and it was communicated that they were. The issuance of an aggregate testing permit allows the permittee to dig holes between 3 ft and 20 ft in depth to observe and test the aggregate resource present. The results of the testing may determine whether the permittee has interest in developing the resource.

II. PROJECT DEVELOPMENT

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

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

Upon receipt of the application, the Minerals Management Bureau contacted the Bozeman Unit to inform them of the application. The Bozeman Unit Manager called the surface lessee for the tract twice, leaving messages both times and sent the lessee a letter (appendix A) on June 17th, 2025. The purpose of the phone calls and letters to the surface lessee is to both inform them of the application and to gather their perspective and take any comments they may have. At the

time that this document was written, no correspondence has been received from the surface lessee. Additionally, the author contacted the Madison County planning department on Friday June 20th, 2025 to determine whether the project needed any special permitting related to the county's airport affected area "AAA."

3. ALTERNATIVES CONSIDERED:

No Action Alternative: The aggregate testing permit application would be denied.

Action Alternative: The aggregate testing permit application would be approved with standard stipulations along with any special stipulations identified resulting from this analysis.

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

Will the project impact any unique geologic features?

No.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:

List any species of concern identified in the proposed testing area through review of the Montana Natural Heritage Program Map. Identify any impacts that aggregate testing would have on each of these species.

Table 1: Species of concern species occurrences for the project area

⊞	**V - Pleiacanthus spinosus** *(Spiny Skeletonweed)* SOC
⊞	**B - Long-billed Curlew** *(Numenius americanus)* SOC
⊞	**B - Sage Thrasher** *(Oreoscoptes montanus)* SOC
⊞	**M - Grizzly Bear** *(Ursus arctos)* SOC
⊞	**B - Ferruginous Hawk** *(Buteo regalis)* SOC
⊞	**B - Thick-billed Longspur** *(Rhynchophanes mccownii)* SOC
⊞	**B - Great Blue Heron** *(Ardea herodias)* SOC
⊞	**M - Townsend's Big-eared Bat** *(Corynorhinus townsendii)* SOC
⊞	**B - Burrowing Owl** *(Athene cunicularia)* SOC
⊞	**O - Bat Roost (Cave)** *(Bat Roost (Cave))* IAH

Spiny Skeletonweed – It is likely that this plant lives within the project area. Representatives of the Montana DNRC will be present during the testing activities if the action alternative is selected. Care should be taken to avoid disturbing Spiny Skeletonweed. However, in the case that singular or multiple individuals of this plant species are disturbed by testing, the impacts to the overall population and the viability of the species would be minor and short-term.

Long Billed Curlew – The Long-billed Curlew breeds in mixedgrass prairie habitats and moist meadows throughout Montana. It prefers to nest in open, short-statured grasslands and avoids areas with trees, dense shrubs, or tall, dense grasses (Dugger and Dugger 2002).

The project area possesses these characteristics, and it is possible that the long-billed curlew may be utilizing the project area. The selection of the action alternative would introduce minor and

short-term impacts in the form of visual and audible disturbances to any individuals of the long-billed curlew utilizing the project area. Adjacent grasslands are abundant in the area and would be expected to be able to accommodate the disturbed individuals temporarily.

Sage Thrasher - In Montana, the Sage Thrasher breeds in habitats dominated by Big Sagebrush. Sage Thrasher abundance is positively correlated with sagebrush cover and negatively correlated with grass cover. The Sage Thrasher uses sagebrush habitats, grasslands, and other semi-arid habitats during spring and fall migration and tends to avoid areas of human habitation (Reynolds et al. 1999).

The project area is mostly comprised of grasslands and does not contain significant amounts of sagebrush. Therefore, it is unlikely that the Sage Thrasher will be utilizing the project area. However, if there are individuals of the species utilizing the project area, the action alternative is not expected to significantly impact any individuals of the species. The impacts would be similar to those that were explained for the Long-billed curlew.

Grizzly Bear - In Montana, Grizzly Bears primarily use meadows, seeps, riparian zones, mixed shrub fields, closed timber, open timber, sidehill parks, snow chutes, and alpine slabrock habitats. Habitat use is highly variable between areas, seasons, local populations, and individuals (Servheen 1983, Craighead and Mitchell 1982, Aune et al. 1984). Historically, the Grizzly Bear was primarily a plains species occurring in higher densities throughout most of eastern Montana**.**

The project area is outside of any designated Grizzly Bear recovery zones, and is adjacent to pre-existing human disturbances such as housing, an airport and a highway. Although the habitat of the project area may be suitable for a Grizzly Bear, it is unlikely that an individual of the species would utilize the area for anything more than a travel corridor between more suitable habitat. If the action alternative were selected, it is unlikely that any bear would be disturbed by the activity, however if an individual of the species were in the project area during the testing operations, they would likely leave the project area temporarily and seek other suitable habitat nearby. Due to the nature of the disturbance, it is unlikely that the selection of the action would impact Grizzly Bears in a significant manner. Overall, the impacts would be expected to be short-term and minor.

Ferruginous Hawk - Species is distributed across steppe habitats in central and eastern Montana. It is currently declining and faces threats from loss of habitat due to conversion to agriculture and to a lesser degree, a warming climate. It is also impacted by wind energy production due to collision with turbines.

The project area is approximately 1.3 miles away from the nearest known Ferruginous Hawk nest. The project area, much like the surrounding area may act as hunting grounds for the individuals utilizing this nest. The selection of the action alternative would not be expected to have significant impacts upon the species' ability to hunt. The action alternative would likely have a minor impact on the individuals' ability to hunt in the project area during testing activities. Upon completion of the testing activities the hawks would be expected to be able to utilize the area for hunting again. Overall the impacts would be minor and short-term.

Thick-billed Longspur – The habitat for the Thick-billed Longspur is described as: Semi-arid shortgrass steppe, characteristically open with sparse vegetation, provides nesting habitat; so do structurally similar habitats like overgrazed pastures (With 2010).

The project area does offer some similarities to the preferred habitat above, however it contains consistent vegetation rather than sparse. Any individuals of the species present during project testing would be expected to experience impacts similar to those described for the long-billed curlew.

Great Blue Heron - Great Blue Herons are equally at home in urban wetlands and wilderness settings. Most Montana nesting colonies are in cottonwoods along major rivers and lakes; a smaller number occur in riparian ponderosa pines and on islands in prairie wetlands. Nesting trees are the largest available. Active colonies are farther from rivers than inactive colonies. The number of nests in the colony corresponds to the distance from roads (Parker 1980). Great Blue Herons build bulky stick nests high in the trees when nesting near the shores of rivers and lakes and on the ground or in low shrubs when nesting on treeless islands.

The project area does not contain wetlands or habitat that would be expected to be suitable for Great Blue Heron. Immediately across the Highway (287) from the project area, lies Boulder Creek. Boulder Creek may contain habitat suitable for Great Blue Herron. Considering that the highway would be between the expected habitat, and the project area, the disturbance from testing would not be expected to impact any Great Blue Heron in the area, as the highway, being closer in proximity to the potential habitat would likely create disturbances that would drown-out the disturbances from the testing.

Townsend's Big Ear Bat - Of all of Montana's bat species, Townsend's Big-eared Bat is the most closely associated with caves, mines, and other similar features such as talus caves and erosion cavities found in badlands and river breaks. Caves and abandoned mines are used for maternity roosts and hibernacula (Worthington 1991, Hendricks et al. 1996, Hendricks 2000, Hendricks et al. 2000, Foresman 2012, Hendricks and Kampwerth 2001); use of buildings in late summer has also been reported (Swenson and Shanks 1979). In hibernacula, ambient temperatures ranged from -1.0 to 8.0 degrees (30 to 46 when torpid Townsend's Big-eared Bats were present) (Hendricks and Kampwerth 2001). Temperatures at maternity roosts are poorly documented; the temperature was 12 degrees (54 in mid-July near a colony in an abandoned mine in Lake County), and 18 degrees (66 in August near a colony in a large and relatively open cave chamber in Lewis and Clark County). Most caves and mines in Montana appear to be too cool in summer for use as maternity roosts.

A cave has been identified approximately 2.75 miles away from the project area. The action alternative would likely have no impact on the bat species as it is to occur during daylight hours when the bats will be in their roost. However, if any individuals of the bat species is impacted by testing activities, the impacts would be audible in nature and would be expected to be minor and short-term.

Burrowing Owl - Burrowing Owls are found in open grasslands, where abandoned burrows dug by mammals such as ground squirrels (*Spermophilus* spp.), prairie dogs (*Cynomies* spp.) and Badgers (*Taxidea taxus*) are available. Black-tailed Prairie Dog (*Cynomys ludoviscianus*) and Richardson's Ground Squirrel (*Spermophilus richardsonii*) colonies provide the primary and

secondary habitat for Burrowing Owls in the state (Klute et al. 2003). The burrows may be enlarged or modified, making them more suitable. Burrowing Owls spend much time on the ground or on low perches such as fence posts or dirt mounds.

A colony of Burrowing Owls has been identified approximately 2.75 miles away form the project area. The relative distance from the colony and the nature of the disturbance being minor and short-term suggest that no impact would be experienced by the owls if the action alternative is selected.

Bat Roost - As mentioned in the Townsend's Big Ear Bat section of this analysis, a cave exists approximately 2.75 miles away from the project area. At this distance, the project area is not expected to impact the Roost.

Is the testing area contained within the boundaries of the DNRC Habitat Conservation Plan (HCP)?

No.

Is the testing area within Core or General Sage Grouse Habitat?

No.

Is the testing area within one-half mile of an active Bald or Golden Eagle Nest?

No.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

A Class I (literature review) level review was conducted by the DNRC staff archaeologist for 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. The Class I search revealed that no cultural or paleontological resources have been identified in the APE. Because the project is unlikely to impact any kind of cultural or paleontologic resources, no additional archaeological investigative work will be conducted.

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:

Are there other studies, plans, or projects currently in place on this tract?

Yes, the Department currently leases the tract for grazing to Longhorn Ranch LP. The selection of the action alternative would have minor impacts to the grazing lessee's ability to graze livestock on the land. There would be a minor reduction in available forage after testing has been completed for the remainder of the season. The proponent must pay the lessee for real and actual damages to their leasehold interest per ARM 36.25.138. By the 2026 growing season the testing sites would be expected to begin revegetating.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:

Are there any locally adopted environmental plans and goals for the tracts upon which aggregate testing is proposed?

Madison County planning has implemented special permitting and regulations for an area near the Ennis airport know as the airport affected area or "AAA." The author contacted the Madison County planning department to determine if any special authorization was needed for the project. Cody Marxer of Madison County communicated that no special permits or authorizations were needed through the county if the action alternative was selected.

Checklist EA Prepared By:	**Name: Zack Winfield**	**Date:** 6/23/2025
	Title:Petroleum Engineer	

V. FINDING

25. ALTERNATIVE SELECTED:

After a thorough review of the programmatic environmental analysis, the applicable rules and statutes related to aggregate testing, this checklist EA, and the management and mission of State of Montana School Trust Lands; I have decided to select the action alternative, and the Department will issue an aggregate testing permit as applied for and amended by the proponent. This decision is consistent with the mission of the State of Montana School Trust Lands and will protect the future income generating capacity of the land.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I have concluded that through the adoption of the standard stipulations and the checklist EA that all potential impacts have either be addressed through the checklist, programmatic EA or reduced to insignificance by the adoption of stipulations.

Stipulations to be included in the aggregate testing permit:

1. The permittee shall only conduct testing operations under dry or frozen conditions. Testing under wet or muddy conditions is not allowed under this permit.
2. No testing shall occur in areas where the slope is steeper than 4:1.
3. The permittee shall abide by a 100-foot buffer from all surface water including wetlands.
4. The permittee shall inspect and wash any equipment being utilized in testing prior to commencing work. This shall mitigate the risk of fire and the spread of noxious and invasive weeds.
5. The permittee shall be responsible for the elimination of noxious and invasive weeds that are introduced or exacerbated resulting from aggregate testing activities.

6. The permittee shall only spread a native, weed-free seed mix on the disturbance. The mixture must be approved by the unit office prior to the spreading of seed.
7. The permittee shall keep a fire extinguisher readily available during testing operations. A fire start caused by testing operations is the sole responsibility of the permittee.
8. The Department may postpone testing operations if they are deemed as a fire risk.
9. If any previously unidentified historical, archeological or paleontological resources are encountered during testing, the permittee shall avoid disturbing these resources, shall stop work, and immediately contact the Department's archeologist. Work may only continue after a professional assessment of the site is made by the Department's archeologist.
10. The proponent shall contact the surface lessee and negotiate any damages in accordance with the administrative rules of Montana. The surface lessee damages settlement form shall be returned to the Department prior to testing.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

☐	EIS	☐	More Detailed EA	x	No Further Analysis

Checklist EA Approved By:	**Name:**	Kara Huyser
	Title:	Bozeman Unit Manager
Signature: Kara Huyser	**Date**:	07/14/2025

Appendix A: Letter sent to Surface Lessee June 17, 2025

Bozeman Unit—CLO
2273 Boot Hill Ct, Ste 110
Bozeman, MT 59715

June 17, 2025

Longhorn Ranch, LP
PO Box 278
Ennis, MT 59729

RE: Grazing Lease 3294, Township 6S, Range 1W, Section 36, Madison County Montana - 240 Acres

Dear Lessee,

This letter is to inform you the Trust Lands Management Division of the Montana DNRC received an application to test for a potential gravel pit on the above referenced tract. Our Bozeman Unit has attempted to reach you multiple times via telephone but were unsuccessful. As you may know, The Trust Lands Management Division administers and manages the state trust timber, surface, and mineral resources for the benefit of the common schools and the other endowed institutions in Montana, under the direction of the State Board of Land Commissioners. This is done in a responsible and sustainable manner. Projects such as your grazing lease, gravel pits, and others are essential to the functionality and success of Montana Public Schools. We would like to gain your perspective and answer any questions that may arise from this letter.

Thank you,

Kara Huyser
Bozeman Unit Manager
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Forestry & Trust Lands Division