

## CHECKLIST ENVIRONMENTAL ASSESSMENT

<b>Project Name:</b>	Three Proposed Non-Mechanized LUL's for Mineral Exploration for Rare Earth Elements
<b>Proposed Implementation Date:</b>	~ Spring 2026 through Spring 2029 (for non-mechanized mineral exploration)
<b>Proponent:</b>	Idaho Strategic Resources, Inc. 201 North 3 <sup>rd</sup> Street Coeur d'Alene, ID 83814
<b>Location:</b>	<b>Township 10 South, Range 15 West</b> <b>Section 21: Lots 1, 2, 3 SW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>, SW<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>, S<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>, 270.78 acres, more or less (Common Schools Trust)</b> <b>Section 27: E<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>, W<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>, 160 acres, more or less (Common Schools Trust)</b> <b>Section 28: S<sup>1</sup>/<sub>2</sub>N<sup>1</sup>/<sub>2</sub>, S<sup>1</sup>/<sub>2</sub>, 480 acres, more or less (Common Schools Trust)</b> Beaverhead County, Montana

### I. TYPE AND PURPOSE OF ACTION

Idaho Strategic Resources, Inc. henceforth referred to as the proponent, has applied to the Department of Natural Resources and Conservation (DNRC) for non-mechanized Land Use Licenses (LULs) in the areas noted above (see Figures 1 and 2) to conduct geologic mapping and collect rock samples for geochemical multi-element analyses for Rare Earth Elements, (REE), in these areas. The proponent's plan of operations includes non-mechanized mineral exploration to further characterize the geology and mineral potential for Rare Earth Elements. Exploration goals include identification of possible lode deposits containing Rare Earth Elements, many are listed as critical minerals by the U.S. Geological Survey (USGS) in 2022.

For State land and minerals in Sections 21, 27, and 28 of Township 10 South, Range 15 West, the proponent proposes to begin with geologic mapping and collection of rock chip samples from surface outcrops. The proponent plans to send the samples to a laboratory for geochemical analyses. DNRC expects additional work to include sampling of historic prospect pits, and collection of soil samples. Sampling of soil and rock material would be with hand tools, such as rock hammers, trowels, and shovels.

The proponent plans to access these tracts by existing roads. They indicated the primary route for them would be from Lemhi Pass on the Montana/Idaho border, then 2 miles east on Lemhi Pass Road (Road 83) to Frying Pan Road (Road 1564), then south on Frying Pan Road 2 miles to the common corner between Sections 21, 22, 27, and 28. They plan to access potentially mineralized areas on foot from this common corner. DNRC would only allow vehicle access on open roads/trails on the State Sections proposed for the non-mechanized LUL areas. Geological mapping and sample collection would be done on foot from established roads. The LUL's will contain vehicle requirements, including remaining on open roads/trails.

## II. PROJECT DEVELOPMENT

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

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

State of Montana DNRC: TLMD Staff re: Land Use Licenses for non-mechanized mineral exploration  
State of Montana DEQ Mining Bureau: Eric Dahlgren, Supervisor, Hard Rock Section and Katie Garcin-Forba, Supervisor, Field Services and Technology Section  
DNRC grazing lessee – Lease #9740 – section 21– Lemhi Frontier, LLC  
DNRC grazing lessee – Lease #2411 – section 27 & 28– Sloan JR, O Temple  
Bureau of Land Management, Dillon Field Office, Steven Lubinski, Geologist

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

Montana Sage Grouse Habitat Conservation Program hosted by Montana Department of Natural Resources and Conservation

### 3. ALTERNATIVES CONSIDERED:

No Action Alternative: The three proposed non-mechanized Land Use Licenses (LULs) would not be granted. Existing DNRC Trust Land Management activities would continue, including those associated with grazing leases and timber management.

Action Alternative: The three non-mechanized Land Use Licenses would be granted to Idaho Strategic Resources, Inc. to explore via non-mechanized methods for lode deposits of REEs. Existing DNRC Trust Land Management activities would continue, including those associated with grazing leases and timber management.

## 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.*

Sections 21, 27, and 28 in Township 10 South, Range 15 West (T10S, R15W) are located approximately 60 miles southwest of Dillon, MT and approximately 28 miles to the west of Clark Canyon Reservoir, near Lemhi Pass on the Montana/Idaho border. The geology of the area contains glacial and volcanic deposits that overlie Precambrian fine-grained, clastic sedimentary rocks, i.e., quartzite. Van Gosen, B.S., Gillerman, V.S., and Armbrustmacher, T.J., (2009) in U.S. Geological Survey Circular 1336 cited earlier work that noted quartz veins in the Lemhi Pass district that are enriched in REE and thorium-bearing minerals, including monazite, allanite, and thorite. The quartz veins occur in fractures of the Precambrian quartzite and siltite. Some small quartz veins in the district may contain minimal amounts of some other metals, gold, and/or copper. Lewis, R.S., et al. in

Northwest Geology (2017) noted an exposure of the thorium-REE-iron oxide-bearing quartz veins at the Cago mine in Idaho, about 1.5 to 3.9 miles from the areas noted above. The veins have a steep to moderate dip and vary in size. They noted that monazite is the major REE-bearing mineral in the district and thorite is the main thorium-bearing mineral. Both are microscopic in grain size.

The Geologic Map of the Lemhi Pass Quadrangle, Lemhi Co. Idaho, and Beaverhead Co. Montana Digital Web Map 183, by Burmester, Russell F., et al. (2018) indicates the occurrence of Tertiary quartzite-bearing ash flow tuff (Tqt) in the eastern part of Section 27 and N $\frac{1}{2}$ NE $\frac{1}{4}$  part of Section 21. The predominant rock in the area is quartzite, possibly Precambrian Gunsight Formation (Yg?) or a new member of the Apple Creek Formation.

Mafic lava flows (Tlm) (Eocene) occur southwest of the Dan Patch Fault on the east side of Section 28 and the W2SW4 of Section 27. Section 28 also includes an elongated ribbon of rock of Cambrian age. Notes for the map describe this rock as fine-grained, equigranular to porphyritic diorite, lamprophyre and related mafic intrusive rocks, mostly in dikes.

Burmester, et al. (2018) mapped the Dan Patch Fault trending NW to SE approximately through the area in the northern part of Section 28, the E2SW4 of Section 27, and the SW4 of Sec 21. This normal fault has its downthrown side to the southwest.

A few scattered prospect pits are present on State minerals in Sections 21 and 28. The geologic map of the area shows about 515 feet of a NW-SE striking quartz vein extending into the SW4NE4 of Section 21. About 200 feet of vein is mapped on/near the south border of the SW4SE4 of this Section. The USGS topographic map covering the State mineral estate of interest shows two prospect pits in the State-owned portion of Section 28 and three in Section 21.

A number of prospect pits occur in N $\frac{1}{2}$ N $\frac{1}{2}$  of Section 28 and the NE $\frac{1}{4}$ SE $\frac{1}{4}$  of Section 21 where the State does not own the minerals. Idaho Champion Resources LLC acquired by Idaho Strategic Resources, Inc. recently staked Federal mineral estate in Section 21, 27, and 28. Thorium Energy Partners LLC has active claims in Section 28 located in 2007 and 2014. One noted in the SW $\frac{1}{4}$  of Section 28 could be in error.

According to the USDA Web Soil Survey, Section 21, 27, and 28 contain stony soils that are predominately found in mountainous areas and steep slopes. Much of the soil's parent materials consist of volcanic ash over glacial till derived from quartzite, colluvium derived from quartzite, slope alluvium, and colluvium. A small area in Section 28 has the soil parent material noted as colluvium derived from andesite and/or rhyolite and/or tuff. Soils include gravelly/stony sandy loam, gravelly ashy loam to very gravelly sandy loam and/or sandy clay loam, very cobbly clay loam, extremely gravelly loam, and some very gravelly clay, clay loam, and clay.

This project would have minimal impacts on soil quality and stability. The project would include foot traffic and hand tools for sampling. The proponent would be required to stockpile topsoil separately while digging. When pits are refilled, the proponent would replace the subsoil first then all topsoil and sod.

No action alternative: The current geology and soils in the project area would remain undisturbed, as they currently exist, unless affected by other activities in the area.

Action alternative: The proponent would be granted three non-mechanized mineral exploration LULs to explore for REEs through geological mapping, sampling of rock outcrops and soils. Non-mechanized soil sampling with hand tools would cause minimal soil disturbance on a possible grid 50 to 100's of feet apart, or scattered locations throughout the areas of interest. The LULs will include a requirement to reclaim any disturbances of soil immediately after samples are taken.

**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.*

Intermittent ephemeral streams, including North Frying Pan Creek, South Frying Pan Creek, and Trapper Creek, flow down the Beaverhead Mountains through part of the areas of interest.

**Section 21: Lots 1, 2, 3 SW $\frac{1}{4}$ NE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$ , S $\frac{1}{2}$ SW $\frac{1}{4}$**

Intermittent North Frying Pan Creek flows through the N $\frac{1}{2}$  of the S $\frac{1}{2}$  of Section 21 where the State owns just the surface estate. Only a small reach of this creek traverses the SW $\frac{1}{4}$ SE $\frac{1}{4}$  of this Section. The headwaters of an unnamed intermittent stream are present in Lot 1.

The intermittent North and South Forks of Frying Pan Creek converge near the boundary between Section 21 and 22 to create perennial Frying Pan Creek.

**Section 27: E $\frac{1}{2}$ SE $\frac{1}{4}$ , W $\frac{1}{2}$ SW $\frac{1}{4}$**

Intermittent Trapper Creek flows through the SE $\frac{1}{4}$ SE $\frac{1}{4}$  and NE $\frac{1}{4}$ SE $\frac{1}{4}$  of Section 27 and continues downstream to intersect a perennial reach of Frying Pan Creek. The headwaters of an unnamed intermittent stream and a spring occur in the NW $\frac{1}{4}$ SW $\frac{1}{4}$  of Section 27.

**Section 28: S $\frac{1}{2}$ N $\frac{1}{2}$ , S $\frac{1}{2}$**

Part of intermittent South Frying Pan Creek flows through part of the S $\frac{1}{2}$ N $\frac{1}{2}$  of Section 28. An unnamed intermittent stream also flows through part of the E $\frac{1}{2}$  of this Section and intersects South Frying Pan Creek.

**Groundwater**

According to Montana's Ground Water Information Center there are no water wells within one mile of the project area.

The Land Use Licenses will include the following special stipulation that covers springs, wetlands, and streams:

Soil disturbance within 50 feet of springs, wetlands, and/or the ordinary high-water mark of streams is not permitted without prior written approval by DNRC Minerals Management Bureau.

If soil disturbance within 50 feet of these features is proposed in exploration plans, MMB would review and require appropriate mitigation measures as warranted. No effects to water resources are anticipated.

No action alternative: The current ground and surface water in the area will not change in abundance or quality unless affected by weather conditions or other activities in the area.

Action alternative: The apparent depth to groundwater, the use of the buffer stipulation for streams, springs, and wetlands and the non-mechanized nature and scope of the project would produce few if any impacts to the water resources on these tracts due to implementation of the action alternative.

**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 closest Class I airsheds to the State lands propose for non-mechanized mineral exploration are the Red Rock Lakes, located about 78 miles away from the tracts. Non-mechanized mineral exploration activities would not impact these airsheds due to the distance between them and the proposed LUL boundaries and to the nature of the activity proposed.

Emission sources in the vicinity of the areas proposed for the LULs include vehicle travel from ranching operations and reaching areas for recreational purposes, such as hiking. The activities would also create fugitive dust that is expected to settle within close proximity to the roads/trails, or pastures.

The company estimates a maximum of 10 site visits per year over the 3-year term of the LULs. One to two pickup trucks could traverse existing unimproved roads trail(s) on the licensed areas per site visit. A short-duration, minimal increase in airborne pollutants and particulates would be expected. Exploration activities would be carried out on foot and vehicles will be restricted to open roads/trails.

Dust could be stirred up during the short-term site visits. The dust is expected to stay close to the source, the roads/trails. Increased wind velocities would likely increase dust dispersion in the area due to existing conditions.

The combustion of gasoline or diesel fuel at the sites would release GHGs, primarily carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O) and much smaller concentrations of non-combusted fuel components, including methane (CH<sub>4</sub>) and other volatile organic compounds (VOCs).

U.S. Environmental Protection Agency (EPA) notes information on GHG emissions, “automobiles using gasoline produce carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) from the tailpipe.” Leaking air conditioners result in hydrofluorocarbon (HFC) production. EPA indicates that the HFC emissions are small in comparison to CO<sub>2</sub>. <https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle> (accessed on March 24, 2025).

U.S. EPA estimates CO<sub>2</sub> emissions from a gallon of gasoline as 8,887 grams CO<sub>2</sub>/gallon and from a gallon of diesel fuel as 10180 grams CO<sub>2</sub>/gallon. According to the U.S. EPA, an average passenger vehicle with a fuel efficiency of 22.2 miles per gallon (MPG) emits about 400 grams of CO<sub>2</sub> per mile (see EPA-420-F-23-014 published in June 2023).

Idaho Strategic Resources, Inc. may use one to two 4X4 pickup trucks powered by gasoline or diesel fuel with a non-city or non-highway fuel efficiency unknown to MT-DNRC. MT-DNRC assumes an efficiency of 10 miles per gallon (MPG) over unimproved road(s)/trail(s) on the tracts. MT-DNRC

also assumes the approximate maximum length of the open unimproved road(s)/trail(s) that will be traversed on the tract(s) to be about 3.6 miles total.

Using the EPA information, MT-DNRC calculated that for one gas-powered pickup traversing the approximate 3.6 miles twice per visit, 10 times per year during the 3-year license term, production of about 0.19 metric tons of CO<sub>2</sub> is expected. This amount increases to 0.38 metric tons for two gasoline-powered pickups. A larger amount of CO<sub>2</sub> would be expected if diesel-powered pickups are used, about 0.22 metric tons for one vehicle or 0.44 metric tons for two. Use of one gasoline-powered pickup and one diesel-powered pickup would contribute about 0.41 metric tons of CO<sub>2</sub> over the 3-year term of the LUL's. In each scenario, these are negligible amounts compared with annual emissions in the State of Montana, the United States, or the World.

Variations in air quality can occur throughout the year due to occurrences such as weather patterns, wildfire smoke, and ranching activities. The small amounts of additional dust and emissions created by non-mechanized mineral exploration are not expected to appreciably increase amounts resulting from existing activities.

A short duration increase in airborne pollutants and particulates could occur from hand digging and vehicular traffic to and from the sites on the existing open, unimproved two-track roads/trails on State land.

Minimal short-term impacts to air quality are expected.

On February 12, 2026 the US Environmental Protection Agency (EPA) finalized the repeal of the 2009 Greenhouse Gas (GHG) Endangerment Finding.

No action alternative: No impacts expected.

Action alternative: The proponent would be granted LULs to map the geology of the licensed area and collect samples. There is a short-term minimal impact to the air quality 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.*

The sections proposed for non-mechanized exploration contain predominantly Montane Sagebrush Steppe system and Conifer-dominated Forest and Woodland system vegetation communities. These systems are found throughout the landscape of southwestern Montana.

DNRC personnel conducted a field visit to Sections 21, 27, and 28, T10S, R15W, PMM on September 8, 2022. Personnel noted native vegetation on the sites includes native grassland, shrubs, and trees.

Research of the Montana Natural Heritage Program's Species of Concern database was conducted for the project area. The search yielded three plant species of concern in the project area's vicinity; Meadow Horsetail, '*Equistum pratense*,' Lemhi Beardtongue, '*Penstemon lemhiensis*,' and Whitebark Pine, '*Pinus albicaulis*.' Meadow Horsetail is a native plant and range is found throughout western Montana. Lemhi Beardtongue is a native plant with smaller range located in Idaho and Beaverhead,

Deer Lodge, Ravalli, and Silverbow Counties of Montana. Whitebark Pine ranges all through western Montana but remains threatened due to Mountain Pine Beetle and Blister Rust causing extensive mortality. The closest Montana Natural Heritage Program (MT-NHP) Whitebark Pine site, last observed in 2017, locates about 0.4 miles from Section 28 and about 0.7 miles from Section 21. The 2022 Fry Bear Timber Sale Environmental Assessment Checklist (EAC) did not note this tree in existing vegetation conditions for areas of the sale, including Sections 21, 27, and 28.

Douglas Fir, and Lodgepole Pine predominate in the area. Smaller amounts of Subalpine Fir, and Engelmann spruce are also present. The Fry Bear Timber Sale EAC noted “Forested stands in the project area occur as fragmented and isolated patches within a broad grassland/shrubland matrix.”

The Fry Bear Timber Sale EAC also indicated that MT-NHP had included Sensitive/Rare Plants: Meadow Horsetail (*Equisetum pratense*) and Lemhi Beardtongue (*Penstemon lemhiensis*) in a report for the area. “Meadow horsetail primarily occurs in riparian and wetland areas.” The 50-foot buffer stipulation planned for use in the LULs would cover concerns regarding this plant.

Lemhi Beardtongue prefers sparsely vegetated areas generally below or near the lower extent of Douglas-fir and/or lodgepole pine forest. It occurs on moderate to steep east- to southwest-facing slopes (Montana Field Guide for Lemhi Beardtongue accessed 2023). “Lemhi beardtongue is most vulnerable during its active growing season; from mid-May to mid-July” (Fry Bear Timber Sale EAC, 2022). The closest MT-NHP site for this plant occurs about 0.87 miles from the closest state minerals in Section 21. Some grasslands are present on the areas proposed for the LUL’s. MMB will include an avoidance stipulation for Lemhi beardtongue on each of the LUL’s.

Invasive weed species identified in the area include Cheatgrass, ‘*Bromus tectorum*,’ as a regulated weed, and Spotted Knapweed, ‘*Centaurea stoebe*,’ Canada Thistle, ‘*Cirsium arvense*,’ and Common Hound’s-tongue, ‘*Cynoglossum officinale*,’ being noxious weeds. As part of Land Use Licenses, the Licensee is responsible for the management and mitigation of noxious weeds introduced by the Licensee’s activities in the licensed areas.

No action alternative: The current vegetation would remain unchanged unless affected by other activities in the area.

Action alternative: The vegetation in the project area would experience limited disturbance from the proposed action, including possible minor clearing of vegetation using hand tools. Vehicle use would be restricted to established roads/trails and to times when the soil moisture content is below 20 percent. No impacts are expected to occur from the proposed activity that would not be addressed by mitigation measures. Mitigation of impacts on vegetation are covered through the proponent’s repair of soil damage created by mineral exploration activities. DNRC will provide information on Lemhi Beardtongue for recognition and require location and avoidance.

Spread of noxious weeds is a concern and the proponent would be required to monitor exploration sample sites and control noxious weeds during the license period. DNRC will require washing of vehicles prior to entry onto the tracts to help reduce the spread of noxious weeds. DNRC would require vehicles to have adequate fire suppression equipment available and follow guidance from the Dillon Unit, CLO. Water and hand tools will be required to be on hand during activities on the licensed areas. The proponent will be advised to call 911 if a fire starts.

## **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.*

These areas proposed for the LUL's provide habitat for a variety of big game, large and small mammals, raptors, greater sage grouse, and variety of other birds. Wildlife activities, if present on the tract, may experience temporary disruption due to the proposed project, but no more than what is currently occurring from human activity in the area. Minimal impacts are anticipated from non-mechanized exploration.

### **Section 21 (Lots 1, 2, 3 SW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>, SW<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub>, S<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>):**

MT Natural Heritage Program (MT-NHP) information shows a Great Gray Owl site on State Surface/BLM minerals in Section 21. It was last observed in 1978 with no evidence of breeding. MT-NHP shows a 1996 site for Westslope Cutthroat Trout in Frying Pan Creek, about 0.76 miles from state ownership in Section 21.

Sites last observed in 2020 for Clark's Nutcracker and Great Grey owl, with no evidence of breeding are present on the southern portion of Section 21 and northern portion of Section 28. Other sites, about 0.5 miles from state ownership in Section 21 also did not have evidence of breeding. A Black-backed Woodpecker site, last observed in 2018 with indirect evidence of breeding noted, occurs in the northern portion of Section 28 near Section 21's SW<sup>1</sup>/<sub>4</sub>. Northern Goshawk sites, last observed in 2018 and 2020 with no evidence of breeding, occur in the northern portion of Section 28. The 2018 site locates near Section 21.

Section 21 occurs within Executive Order Greater Sage Grouse Core and General Habitat areas. Approximately the NE<sup>1</sup>/<sub>4</sub> of Section 21 locates inside the boundary of core habitat. The remainder of Section 21 falls within general sage grouse habitat. A sage grouse Executive Order stipulation will be utilized on the Land Use License for this Section. The closest MT-NHP active sage grouse lek with indirect evidence of breeding locates about 7 miles from the proposed license area's closest point. Their data notes this lek was last observed in 2022. A site with no evidence of breeding, last observed in 2021, occurs about 1 mile from Section 21. A sage grouse Executive Order stipulation will be utilized on the Land Use License for this Section.

MT-NHP data shows a grizzly bear site, last observed in 1999, approximately 0.6 miles from Section 21's closest point. This Section does not locate in a grizzly bear recovery zone or non-recovery occupied habitat areas.

### **Section 27: E<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub>, W<sup>1</sup>/<sub>2</sub>SW<sup>1</sup>/<sub>4</sub>**

MT-NHP data notes another Great Gray Owl site on BLM Land in Section 27. It was last observed in 1978 with no evidence of breeding.

MT-NHP data shows the closest site for Westslope Cutthroat Trout in intermittent Trapper Creek in Section 34, about 0.46 miles from the E<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub> of Section 27. This site was last observed in 1993. Other upstream MT-NHP Westslope Cutthroat Trout sites in Trapper Creek in Section 34 were last observed in 1993 and 1982. Trapper Creek flows into the E<sup>1</sup>/<sub>2</sub>SE<sup>1</sup>/<sub>4</sub> of Section 27 and intersects

perennial Frying Pan Creek in Section 23. The data indicates this trout is considered sensitive by both BLM and the United States Forest Service (USFS.)

Section 27 occurs within Executive Order Greater Sage Grouse General Habitat area. The closest active sage grouse lek to the E2SE4 of Section 27 locates about 6 miles from this part of state surface and mineral estate proposed for non-mechanized mineral exploration. This lek was last observed in 2022 and MT-NHP data notes indirect evidence of breeding. A sage grouse Executive Order stipulation will be utilized on the Land Use License for this Section.

MT-NHP data shows a grizzly bear site, last observed in 1999, approximately 1.4 miles from the area of interest's closest point in Section 27. This Section does not locate in a grizzly bear recovery zone or non-recovery occupied habitat areas.

**Section 28: S½N½, S½**

Section 28 occurs within Executive Order Greater Sage Grouse General Habitat area. The closest MT-NHP sage grouse site to Section 28 is located about 2.3 miles from the tract's state mineral ownership's closest point. This sighting took place in 2021 with no evidence of breeding. A 1977 site, about 2.5 miles from the State' part of Section 28 had direct evidence of breeding at that time. The closest sage grouse site to this area with indirect evidence of breeding locates about 7 miles from this part of state surface and mineral estate. This lek was last observed in 2020. A sage grouse Executive Order stipulation will be utilized on the Land Use License for this Section.

MT-NHP sites for Northern Goshawk, last observed in 2018 and 2020 with no evidence of breeding, occur in the N½N½ of Section 28. The 2018 site locates near Section 21.

MT-NHP data shows a grizzly bear site, last observed in 1999, approximately 0.4 miles from Section 28's closest point. This Section does not locate in a grizzly bear recovery zone or non-recovery occupied habitat areas.

Due to the non-mechanized mineral exploration activity proposed on these three tracts, fish, if present, would not be affected. There would be minimal, if any, additional effects other than those that may take place due to DNRC post-timber harvest or timber management activities. The Land Use Licenses will also contain a 50-foot stream buffer stipulation. All three tracts will have a sage grouse Executive Order stipulation included in the license for each.

No action alternative: The project area would remain undisturbed by non-mechanized mineral exploration.

Action alternative: The proponent would be granted a LUL and impacts to habitats would be negligible. The size of the project area and length of the action alternative are not substantiative enough to permanently disrupt wildlife in the area. Similar habitat and forage can be found throughout the area and could sustain the wildlife species present.

**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.*

As noted above, Section 21, T10S, R15W occurs within Executive Order Greater Sage Grouse Core and General Habitat areas. Approximately the NE¼ of Section 21 locates inside the boundary of core habitat. The remainder of Section 21 and Sections 28 and 27 fall within general sage grouse habitat. A sage grouse Executive Order stipulation will be utilized on the Land Use Licenses for the applicable sage grouse habitat.

Searches of Montana Natural Heritage Program (MT-NHP) Internet site on various days facilitated identification of seven other animal species of concern in proximity to the sections of the proposed activity: Golden Eagle (last observed 2020, No evidence of breeding (NEB), ~ 1 mile from Sec 21 closest point, another site occurs ~ 1.4 miles from Section 28's closest point (last observed in 2019, (NEB)). For Clark's Nutcracker, Black-backed Woodpecker, Great Gray Owl, and Westslope Cutthroat Trout, see discussion above in 8. Terrestrial, Avian, and Aquatic Life and Habitats.

MT-NHP data also contains an observation of a Grizzly Bear from 1999 within a mile of the proposed activity. However, the three tracts of interest do not locate in a grizzly bear recovery zone or in non-recovery occupied habitat areas.

The Fry Bear Timber Sale Environmental Assessment Checklist (EAC) noted some forested areas are considered lynx habitat. This EAC indicated that minimal adverse direct, indirect, and cumulative effects to Canada lynx would be anticipated. The proposed non-mechanized mineral exploration activities would be considerably less disruptive than for timber harvest, so little to no effects to Canada lynx would be likely due to the exploration.

No action alternative: The project area would not be disturbed by non-mechanized mineral exploration.

Action alternative: The proponent would be granted a land use license to map the geology of the area and collect rock and possibly soil samples. There could be a temporary disruption to species of concern if they are present on the tracts. Range lands and scattered mountainous timbered areas occur in the project's vicinity. Animals would utilize surrounding areas during the temporary disturbance with the ability to return to the sites upon project completion and/or reclamation, if required. The short duration and non-mechanized nature of this project should not interfere with wildlife species of concern and their habitat. The proponent would be working through the MT Sage Grouse Habitat Conservation Program per Provision 21, Stipulation 12.

**10. HISTORICAL AND ARCHAEOLOGICAL SITES:**

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

The DNRC staff archaeologist conducted a Class I (literature review) level review for the area of potential effect (APE) on State surface located in Sections 21, 27, and 28, T10S, R15W. 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 no cultural or paleontological

resources have been identified in the APE, but it should be noted that Class III level inventory work has not been conducted there to date.

Because the topographic setting and geology suggest a low to moderate likelihood of the presence of cultural or paleontologic resources, proposed geologic sampling will have *No Effect to Antiquities*. No additional archaeological investigative work will be conducted in response to this proposed development. However, if 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.

The Land Use Licenses will require the Licensee to stop work and contact DNRC if cultural or paleontological resources are encountered.

No action alternative: Non-mechanized mineral exploration would not occur. The project area would not be disturbed by this activity.

Action alternative: The proponent would be allowed to map the geology of the area and collect rock and/or soil samples for geochemical analyses. No effects to cultural, archeological, or paleontological resources are anticipated resulting from the action alternative. However, if any of these resources are encountered during exploration activities it is the operator's responsibility to cease action and call the DNRC per Provision 18 of the Land Use Licenses.

**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.*

Impacts to aesthetics would be minimal during the project. There will be no significant increases to noise, and minimal increase in traffic.

No action alternative: Aesthetics would remain in their current state.

Action alternative: The proponent would map the geology of the area and collect rock and/or soil samples on foot after travelling to the area via established roads (see page 1). Minimal disturbance for this exploration would not change the area's 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 to environmental resources.*

The proposed project would have minor, temporary impact on environmental resources.

If soil samples are taken, small sampling holes would be hand dug in various locations in Sections 21, 27, and 28 to facilitate collection of the soil for geochemical analyses. The proponent would reclaim all sample hole sites and any soil disturbance created by this project. DNRC's non-mechanized Land Use Licenses will limit the maximum size of the hand-dug sample holes/pits to 2 square feet unless approved by MMB-DNRC in writing. The LULs will require that sample holes should be properly filled with subsoil and topsoil. A buffer stipulation addresses concerns regarding springs, wetlands, and streams.

No action alternative: The area would not be impacted by non-mechanized mineral exploration.

Action alternative: The proponent would be allowed to use non-mechanized mineral exploration techniques, such as, geological mapping, rock sampling for geochemical analyses for REE, and possibly soil sampling, also to test for these elements. The licenses will contain a stipulation limiting the size of sample holes and require their refilling. The proposed project would not affect water quality or quantity and no water is required for the samples. Air quality may be temporarily affected by airborne dust generated by short-term vehicle use of existing two-track roads/trails, and by foot traffic and small hand-held equipment used in this project.

The action alternative would allow for the proponent to explore for REEs which are listed on the United States Geological Survey's list of critical minerals.

**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 Fry Bear Timber Sale Environmental Assessment Checklist (April 2022) noted proposed implementation date for this sale as May 2022. DNRC records show the effective date of this sale as June 30, 2022. RY Timber originally purchased this timber sale. It was concluded by Sun Mountain Lumber with the contract expiration date of Nov. 13, 2025. This timber sale harvest has been completed.

No action alternative: The State Land proposed for non-mechanized mineral exploration would not be evaluated for rare earth minerals. Existing Trust Land Management related activities would continue, including grazing operations and DNRC post timber-harvest activities.

Action alternative: The project area would be explored for rare earth minerals. Grazing and DNRC post timber-harvest-related operations would continue. Any sample holes dug with hand tools would be backfilled first with subsoil and then with the disturbed topsoil.

**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.*

No human and health safety risks were identified related to the proposed project other than the typical occupational hazards that coincide with non-mechanized mineral exploration operations.

No action alternative: No impact.

Action alternative: No impacts expected due to only small amounts of mineral dust generation.

**15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:**

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

The proposed project may have a short-term, minor effect on grazing and post-timber harvest activities. The LUL's will include contact and coordination stipulations. Effects on current or future industrial, commercial, and agricultural production activities are dependent on detailed exploration results that are unknown at this point.

No action alternative: No impact.

Action alternative: The action alternative has potential to provide an essential resource to industrial, commercial activities. Non-mechanized mineral exploration provides a starting point for evaluation of possible mineral resources that may/or may not be present.

**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.*

No action alternative: No Impact.

Action alternative: No Impacts 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.*

No action alternative: No Impact.

Action alternative: No Impacts expected.

**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.*

No action alternative: No Impact.

Action alternative: No Impacts expected.

**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.*

MT-DNRC produced a Habitat Conservation Plan (HCP) for Forest Management Bureau activities in western Montana in 2010. The HCP is meant to "avoid, minimize, and/or mitigate the impacts of incidental take of threatened and endangered species as a result of timber harvest and related activities to the maximum extent practicable." The plan covers these tracts for timber harvest and related activities. However, the proposed mineral exploration activities are not timber harvest and related activities.

The Bureau of Land Management (BLM) Dillon Field Office has undertaken a 15-year Resource Management Plan Evaluation. They expected to have the Evaluation Report finalized sometime in the summer of 2022. A small area of BLM land is adjacent to State Land in Section 21. There are no other known management plans or zoning plans in the area.

The year 2009 saw completion of the most recent Beaverhead/Deer Lodge National Forest Management Plan. The USFS had to complete a supplemental EIS for this plan in response to a 2015 court order regarding “analysis of snowmobile impacts on big game wildlife” and application of “the minimization criteria in the [2005 Travel Management Rule].” Federal Register September 11, 2015.

The Salmon Challis National Forest consolidated in 1998. Information from their website indicates they are currently revising their management plan.

Beaverhead-Deerlodge National Forest and Salmon-Challis National Forest finalized an Environmental Impact Statement in 2002 for the Lemhi Pass National Historic Landmark Management Plan and the Salmon National Forest Land and Resource Management Plan Amendment #8 and the Lemhi Pass National Historic Landmark Mineral Withdrawal. The U.S Department of Interior has recently extended the mineral withdrawal for about 1325 acres around Lemhi Pass with possible expansion of 175 acres. The purpose noted for this withdrawal is for continued preservation of the Lemhi Pass National Historic Landmark in Idaho and Montana for an additional 20 years as indicated in the Bureau of Land Management’s press release dated November 17, 2022. This extended withdrawal could increase interest in State of Montana mineral and surface estate in the area.

No action alternative: No Impact.

Action Alternative: No Impacts expected.

**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.*

No wilderness areas exist on or near Sections 21, 27, or 28, T10S, R15W. Sections 21 and 27 do contain some portions of Bureau of Land Management land. Sections 21 and 28 border US Forest Service land. The Lemhi Pass National Historic Landmark’s southern boundary in Montana locates about 0.6 miles from the closest portion of Section 21, T10S, R15W proposed for non-mechanized mineral exploration. The areas of interest in Sections 27 and 28 are over a mile away from the Landmark’s southern boundary.

No action alternative: No Impact.

Action alternative: Given that the tracts have public access through Frying Pan Road and on foot through State, BLM and US Forest Service land, the non-mechanized nature of the proposed exploration, the small amount of disturbance, and the short time-frame anticipated for the proposed activities, no impacts on recreational activities are anticipated.

**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.*

No action alternative: No Impact.

Action alternative: No Impacts expected.

**22. SOCIAL STRUCTURES AND MORES:**

*Identify potential disruption of native or traditional lifestyles or communities.*

No action alternative: No Impact.

Action alternative: No Impacts expected.

**23. CULTURAL UNIQUENESS AND DIVERSITY:**

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

No action alternative: No Impact.

Action alternative: No Impacts expected.

**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.*

No action alternative: Currently the project area is being utilized for grazing activities and has had recent timber harvest. The no-action alternative could limit future exploration of REE-bearing minerals on Trust Lands.

Action alternative: The proponent provided a \$25 payment for each Land Use License application fee and would provide an annual rental fee of \$2,732.34 for the Sections 21, 27, and 28 non-mechanized mineral exploration land use licenses ( $\$3 \times 910.78 = \$2,732.34$ ). The 3-year term of these three LUL would generate \$8,197.02 in rental for the Common Schools Trust if the proponent holds them for the complete term.

No cumulative economic and social effects from this non-mechanized exploration are expected.

<b>EA Checklist Prepared By:</b>	<b>Name:</b> Teresa Kinley	<b>Date:</b> 2/18/2026
	<b>Title:</b> Geologist/Hydrologist	

## V. FINDING

### 25. ALTERNATIVE SELECTED:

By completing this Environmental Assessment Checklist, the Department has identified impacts to the environment based on two potential alternatives. The Department has selected the action alternative and will authorize Idaho Strategic Resources, Inc. to conduct non-mechanical mineral exploration such as geological mapping, rock and possibly soil sampling for geochemical analyses. The Department believes this alternative can be implemented in a manner that is consistent with the long term sustainable natural resource management of the area and generate revenue for the Common Schools Trust.

### 26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I conclude all identified potential impacts will be mitigated by utilizing the stipulations listed in the accompanying attachments and no significant impacts will occur because of implementing the selected alternative.

1. Licensee shall follow all applicable state and federal laws, rules and regulations, including but not limited to those concerning safety, environmental protection, reclamation, drone flight requirements for photography and topographic mapping over the site, and sage grouse requirements.

Licensee shall submit copies of required permits or pertinent exemptions to the Department's Minerals Management Bureau (MMB).

2. All vehicle traffic must stay on established, open, roads/trails. Licensee shall abide by any road/trail closures. All vehicle traffic will be limited to time periods or conditions when use of the roads/trails will not create ruts, i.e. periods when the soil moisture content is below 20 percent.

All vehicles must be washed, particularly the undercarriage, to assure removal of dirt, plant material, and seeds prior to entering the tract.

All vehicles must be equipped with fire suppression equipment as follows: a 1-gallon or larger bucket, a usable shovel with a minimum overall length of 36 inches (with a round pointed head and a minimum width of 6 inches), or a pulaski; a 5-gallon container full of water at all times; and an operable, dry-chemical fire extinguisher (minimum 2.5-pound capacity and 4BC or higher rating). In addition, call 911 if a wildfire should get started.

3. The Licensee has the responsibility to keep themselves, staff, and contractors and their staff apprised of the boundaries of the non-mechanized LUL to keep mineral exploration activities within the licensed area. The attached Vicinity Map (Figure 1) and 2023 aerial photo Site Map (Figure 2) provide an approximate location for the areas covered by this non-mechanized LUL.

4. The Licensee will provide MMB with an annual exploration plan covering the licensed area for review and approval prior to beginning non-mechanized exploration each year. The plan should include type of non-mechanized exploration proposed within the licensed area and planned locations of sample sites and potential disturbance areas. Reclamation plans for disturbances should also be included.
5. Soil disturbance within 50 feet of wetlands, springs, and/or the ordinary high-water mark of streams is not allowed without prior written approval by Minerals Management Bureau, Montana Department of Natural Resources and Conservation (MT-DNRC). Panning of sediments is prohibited in streams or springs. Other mitigation measures may be required.
6. Licensee will repair soil damage/disturbance created by the Licensee, employees, contractors and /or subcontractors of the Licensee on the licensed area. The size of hand-dug disturbance is limited to a maximum 2 feet by 2 feet opening, outside the 50-foot buffer zone of streams, springs, wetlands, unless the Licensee receives prior written approval by MMB, MT-DNRC. Topsoil/sod will be stockpiled separately from subsoil for reclamation. Licensee and/or employees/contractors shall fill holes with subsoil before covering with topsoil and sod. All holes must be filled and reclaimed immediately prior to moving on to the next hole. MT-DNRC Dillon Unit will advise the Licensee as to the Unit's requirements regarding reseeding of disturbances.
7. Lemhi Beardtongue, a plant only found primarily in two Montana counties and considered Sensitive by the US Forest Service and BLM, has previously been found in this general Montana/Idaho area. DNRC will provide information on the plant to the Licensee to facilitate identification and avoidance of these plants by staff/contractors on the licensed area. Visual inspection prior to digging and providing a visual reminder of the plant's characteristics and habitat is advised. The Licensee is responsible for personnel, tools, and any survey apparatus avoiding Lemhi Beardtongue plants, if located on this tract. If plants are found, the Licensee is requested to flag and map/GPS their location, protect the plants, and provide DNRC with the plant location(s)/GPS coordinates.
8. Geologic, geochemical/geophysical information (including but not limited to detailed sample site locations, areas disturbed by non-mechanized mineral exploration, and sample results for each corresponding sample site) if collected for the tract will be provided to Minerals Management Bureau, TLMD MT-DNRC annually with a report on exploration activities. The Licensee shall also concurrently provide GPS, GIS, or other data, detailed maps and/or aerial photos associated with the non-mechanized exploration to MMB. Licensee should advise the department if they consider this information confidential.
9. The Licensee, and employees, including contractors, and/or operators shall comply with any requirements of fire restriction stages unless they obtain an exemption that may be issued by the Dillon Unit Manager or Acting Dillon Unit Manager after field review. Access on the tract may be temporarily denied should the fire restrictions rise to the level of closure.
10. To mitigate management conflicts during the term of this license, Licensee must contact and coordinate with MT-DNRC's surface lessee(s) and any future licensee/lessee.

- 11. This license is located within designated sage grouse general and/or core habitat. Proposed activities are subject to, and shall comply with, all provisions, stipulations, and mitigation requirements of the Montana Sage Grouse Habitat Conservation Strategy, as implemented by Governor's Executive Orders 10-2014, 12-2015, and amendments thereto. Contact the TLMD prior to preparing a project proposal.
- 12. The Licensee shall contact the Department's Trust Land Management Division, Minerals Management Bureau if any rare earth-bearing or thorium-bearing minerals, gold, silver, copper, and/or associated minerals are encountered on the licensed premises.
- 13. This license is subject to the requirements or rights of pre-existing rights-of-way/easements and/or agreements.

**27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:**

EIS                     
  More Detailed EA                     
  No Further Analysis

<b>EA Checklist Approved By:</b>	<b>Name:</b> Trevor Taylor
	<b>Title:</b> MMB Bureau Chief
<b>Signature:</b>	<i>Trevor Taylor</i> <b>Date:</b> 2/20/26

See attached Figure 1: Vicinity Map and Figure 2: Detail of 2023 aerial photo for Sections 21, 27, and 28.

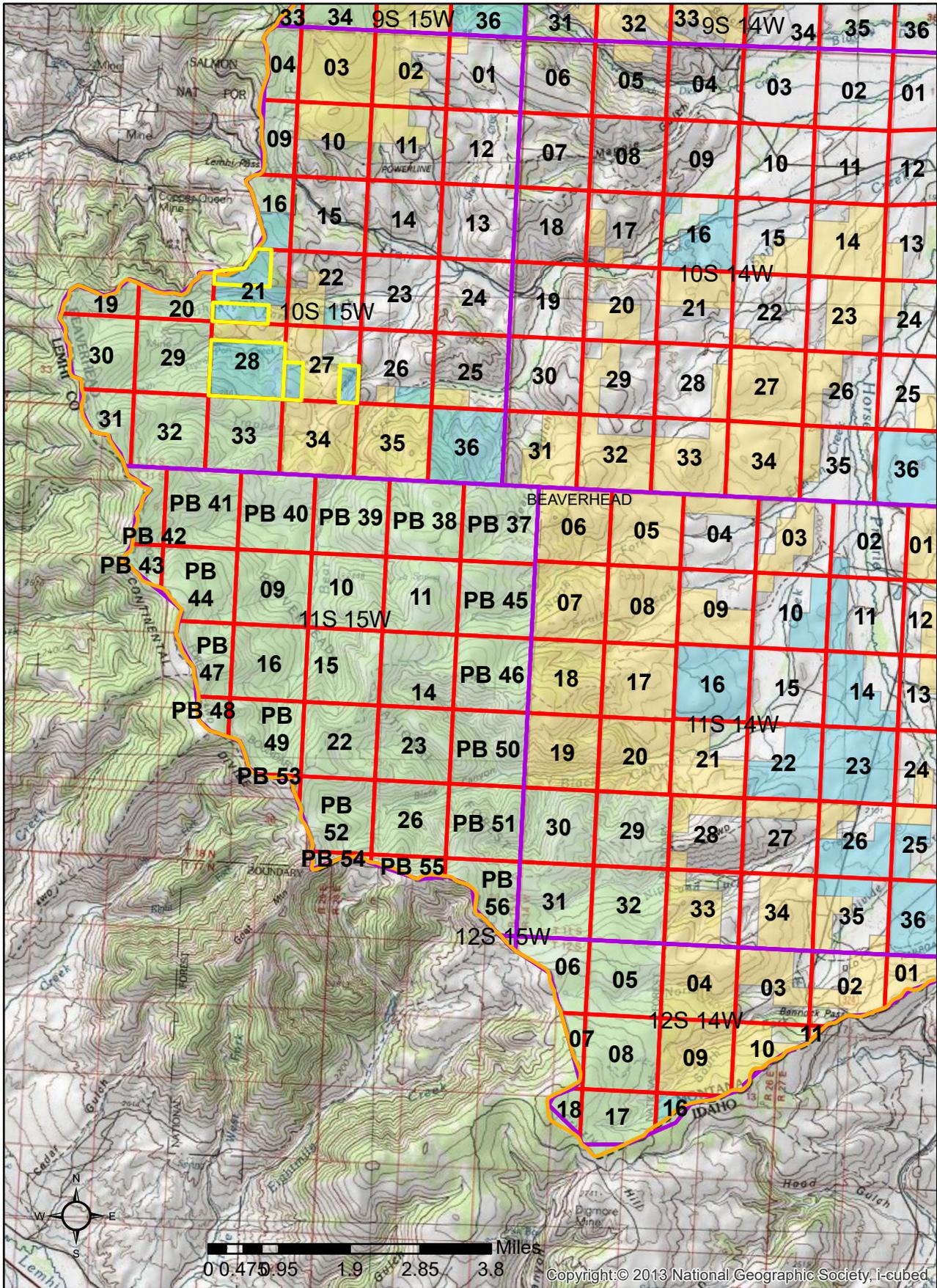


Figure 1: Vicinity Map for Proposed Non-Mechanized Land Use Licenses (yellow outline) in Sections 21, 27, and 28, T10S, R15W, PMM on USGS Topographic Maps. Section 21 occurs adjacent to Idaho. Purple lines indicate Montana's Township/Range grid and red lines show Sections and protracted blocks from 2021 CadNSDI info. Orange - approximate State Line. T. Kinley, MT-DNRC, August 29, 2025.

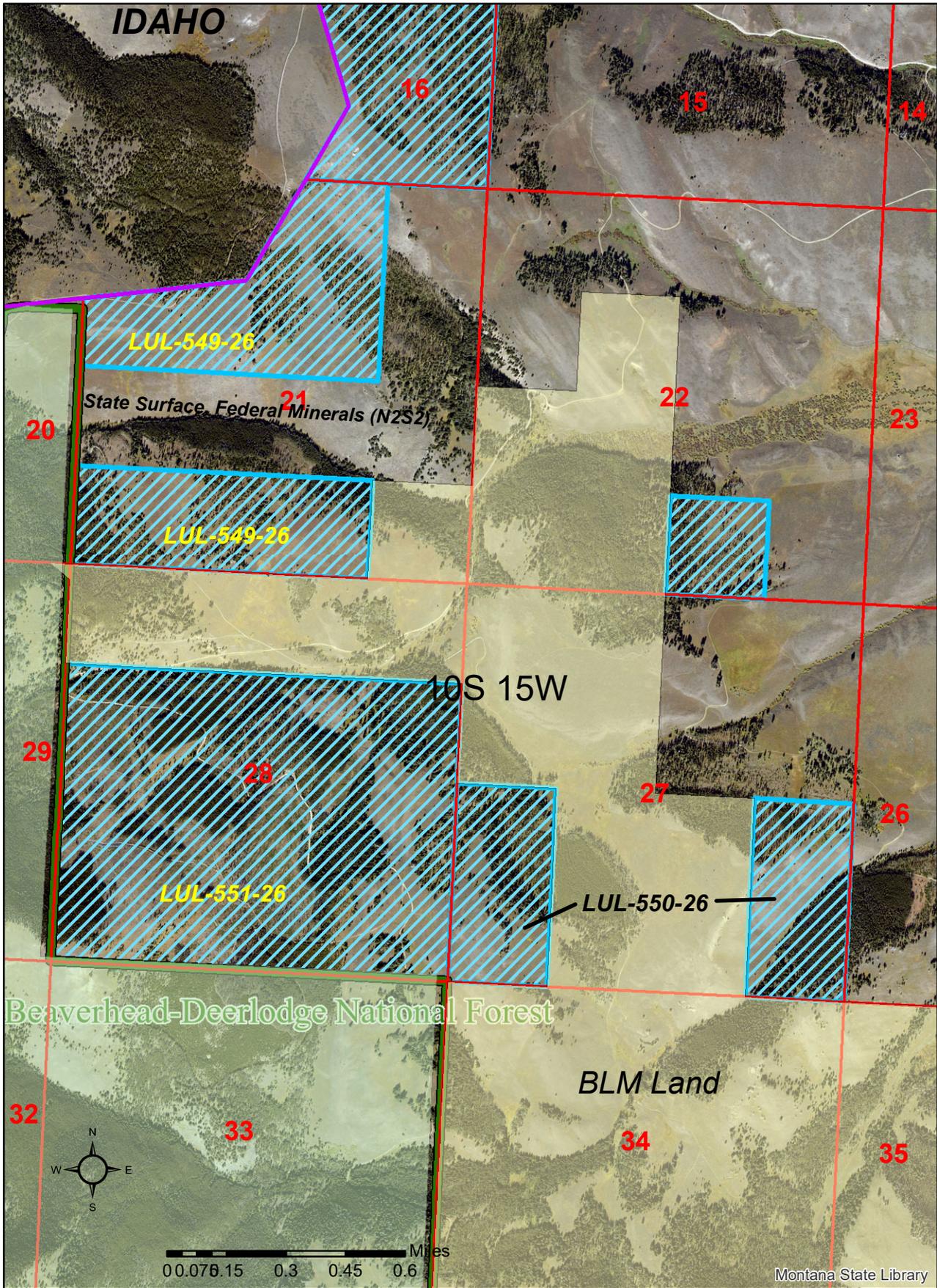


Figure 2: State of Montana Land Use License Areas for LUL 549-26, LUL 550-26, and LUL 551-26 in Sections 21, 27, and 28, T10S, R15W, M.P.M., respectively, in Beaverhead Co, Montana. Base is 2023 Aerial Photography with 2023 CadNSDI line data overlaid. Prepared by T. Kinley, MT-DNRC, February 18, 2026.