CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	Pipe Creek Gravel Testing
Proposed Implementation Date:	Spring – Summer 2024
Proponent:	TCI, Inc
Location:	T31N-R31W-Sec 16 (Common Schools Trust) 73.37 acres of the NENE ¼, SENE ¼, and the SWNE ¼ (Common Schools)
County:	Lincoln

I. TYPE AND PURPOSE OF ACTION

TCI, Inc. henceforth referred to as the proponent, has applied for a gravel test permit on Montana State Trust Lands within the above-referenced tracts in Lincoln County. The project area can be seen on Attachment A on page number 19. This project would utilize a backhoe to dig holes to a depth of approximately 20 feet. Testing and documenting would be performed by employees or sub-contractors of TCI, Inc.

If approved, the proponent would be issued an aggregate testing permit to determine the gravel resource contained within the above-referenced tracts. Gravel and dirt would be excavated from the ground and sub-surface. Topsoil would be saved in a separate pile, and the disturbance created would be reclaimed immediately upon completion of documenting the test pit by backfilling the hole, replacing topsoil, spreading native grass seed. The test pit areas would be seeded with Lolo C Forest seed mix supplied by the proponent.

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 proponent submitted a permit to test for aggregate on January 22, 2024, to the DNRC to explore gravel resources in the project area. The Minerals Management Bureau has been in communication with the Libby Unit regarding the application.

The proponent must obtain written permission through one of the following parties to access the testing area.

- JMF Services Inc.
- Noble Excavating, Inc.

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

- Montana DNRC – FTLD – MMB – Permit to Test for Aggregate

3. ALTERNATIVES CONSIDERED:

***No Action Alternative*:** The permit to test for aggregate would be denied and the proponent would not test for aggregate from the Montana State Trust Lands tracts referenced above.

***Action Alternative*:** The permit to test for aggregate would be approved with stipulations and mitigations identified within this analysis. The proponent would be allowed to dig test holes in the proposed project area.

SUMMARY OF POTENTIAL IMPACTS TO THE PHYSICAL AND HUMAN ENVIRONMENT

The impacts analysis identifies and evaluates direct, secondary, and cumulative impacts.

• **Direct impacts**: impacts that occur at the same time and place as the action that causes the impact

• **Secondary impacts**: further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action.

• **Cumulative impacts**: collective impacts on the human environment of the proposed action when considered in conjunction with other past and present actions related to the proposed action by location or generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact study evaluation, or permit processing procedures.

Where impacts are expected to occur, the impacts analysis estimates the duration and severity of the impact.

The duration of an impact is quantified as follows:
• **Short-term**: impacts that would not last longer than the proposed operation of the site, including reclamation of the site.
• **Long-term**: impacts that would remain or occur following reclamation of the proposed site.

The severity of an impact is measured using the following:
• **No impact**: There would be no change from current conditions.
• **Negligible**: An adverse or beneficial effect would occur but would be at the lowest levels of detection.
• **Minor**: The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
• **Moderate**: The effect would be easily identifiable and would change the function or integrity of the resource.
• **Major**: The effect would alter the resource.

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.

Current Conditions:

Geology: Site geology consists of glacial deposits of gravel.

Soils: According to the USDA's Web Soil Survey, the project area is comprised of lacustrine and glacial outwash terraces.

This soil exhibits the following properties:

Shallow excavations – This rating is the property that influences the ease of digging and resistance to sloughing. The project area soil exhibits a somewhat limited rating to shallow excavations, with their ratings being from 0.01 to 0.15 on a scale of 0.00 to 1.00.

Soil compactibility risk – Soils found in the project area exhibit a medium risk to soil compactibility.

Wind erodibility group – Soils found in the project area exhibit a low risk to wind erosion.

Soil restoration potential – Soils found in the project area exhibit a high potential to soil restoration.

Soil rutting hazard – Soils found in the project area exhibit a slight to severe soil rutting hazard.

Alternatives

No Action Alternative:

The selection of the no action alternative would not be expected to have any direct, secondary, or cumulative impacts to the geology and soil quality, stability, and moisture.

Action Alternative:

Direct Impacts: The proponent would use existing roads to access the testing area. The proponent would then track a backhoe and light-duty trucks off road to test hole sites. The proponent would begin by stripping and stockpiling topsoil prior to continuing to dig to an approximate depth of 20 feet below ground surface, upon reaching the desired depth, the proponent would evaluate the aggregate resource present by taking pictures, measurements, and samples. The removal of topsoil and any potential aggregate resource would be reversible by replacing substrate back into the hole and spreading topsoil over the stripped area. Testing would be conducted in areas with mild topography and under dry or frozen conditions. This should mitigate the risk of displacing, compacting, or otherwise impacting the soils beyond the direct areas of testing. The test pits will be backfilled immediately upon digging and measuring. Areas impacted by testing activities would be expected to achieve full reclamation within two growing seasons, upon revegetation. The impacted areas would return to their current uses shortly after project completion. Negligible, short-term impacts to geology and soil quality and moisture would be expected from the selection of the action alternative.

Secondary Impacts: There are no secondary impacts expected to geology and soil quality, stability and moisture from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected to geology and soil quality, stability and moisture from the selection of the action alternative.

Duration: Impacts from the selection of the action alternative are expected to be short-term.

Mitigations
The potential selection of action alternative would include the following stipulation in the permit to test for aggregate:

- Testing activities shall only be conducted when the ground is dry or frozen to reduce potential for rutting.
- Topsoil will be saved in a separate pile and disturbance would be reclaimed immediately upon completion of logging the test hole.

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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.

Current Conditions

Surface Water: The project area boundary ranges in distance to Pipe Creek from 442 to 775 feet to the west and approximately 230 feet higher in elevation than Pipe Creek.

Ground Water: A search of the Montana Ground Water Information Center's website yields 28 water wells within 1 mile of the project area. Each well is summarized below in Table 1. Inaccurate reporting, less refined legal descriptions and poor mapping accuracy by the well drillers may lead to inconsistencies between the reported and physical location of groundwater wells. Surface elevations were obtained by taking the surface elevation of the reported well location according to Montana State Library lidar.

GWIC ID	LATTITUDE	LONGITUDE	SURFACE ELEVATION	STATIC WATER LEVEL	Calculated Water Level
88267	48.462002	-115.56105	2355	4	2351
88269	48.469263	-115.555748	2562	46	2516
88270	48.46562	-115.555748	2100	4	2096
88271	48.461977	-115.550316	2552	109	2443
88272	48.462888	-115.548958	2558	100	2458
88273	48.462888	-115.551674	2540	126	2414
88274	48.461066	-115.551674	2547	380	2167
88275	48.461066	-115.548958	2550	118	2432
88276	48.461066	-115.557106	2545	140	2405
88277	48.461066	-115.557106	2545	143	2402
88278	48.458334	-115.555748	2539		UNKNOWN
88279	48.458334	-115.555748	2539	350	2189
88280	48.459245	-115.548958	2545	440	2105
130656	48.457467	-115.584238	2506		UNKNOWN
139733	48.461977	-115.550316	2552	351	2201
139734	48.461977	-115.555748	2549		UNKNOWN
139735	48.461977	-115.555748	2549	145	2404
141894	48.459245	-115.55439	2542	351	2191
180260	48.461066	-115.551674	2545	130	2415
195034	48.461066	-115.55439	2545	143	2402
200265	48.461977	-115.550316	2552	111	2441
223287	48.46562	-115.555748	2394	40	2354
225635	48.4674326	-115.5750976	2529	270	2259
271260	48.46106616	-115.5543902	2545	131	2414
273520	48.46197697	-115.5503164	2552	355	2197
326487	48.463799	-115.547601	2562	60	2502
329277	48.46106616	-115.5489585	2552	351	2201
329292	48.46379859	-115.5476005	2562	340	2222

TABLE 1

Alternatives

No Action Alternative:
The selection of the no action alternative would not be expected to have any direct, secondary or cumulative impacts to water quality, quantity, and distribution.

Action Alternative:

Direct Impacts: The average calculated groundwater elevation from nearby water wells is approximately 2327 feet above sea level. The surface water Pipe Creek in the area directly west of the project area is approximately 2257 to 2306 feet above sea level. The relative consistency of the calculated average elevation of groundwater and the observed elevation of surface water provides a confidence interval in which ground water is expected to exist. The project area elevations are approximately 2509-2529 feet above sea level, which is more than 182 feet greater than the calculated groundwater elevation. The action alternative would only dig test holes approximately 20 feet deep. Groundwater would not be expected to be encountered during testing activities, if it is encountered the digging will stop, and the test hole will be backfilled after completion of documenting the gravel resource. If groundwater is encountered, some temporary local turbidity would be expected to occur locally. However, no appreciable changes to groundwater quantity or quality are expected if it is intersected during testing operations. The action alternative is expected to have no, or negligible, short-term impacts to

groundwater quality and quantity in the project area. Surface water quality and quantity are not expected to be impacted by the selection of the action alternative.

Secondary Impacts: There are no secondary impacts expected to surface or ground water quality or quantity resulting from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected to surface or ground water quality or quantity from the selection of the action alternative.

Duration: Any impacts would be expected to be short term, until project completion.

Mitigations
The potential selection of action alternative would include the following stipulation in the permit to test for aggregate:

- All equipment utilized in testing activities must be regularly maintained and inspected to ensure it is not leaking fluids, spreading noxious weeds or creating an undue fire hazard.
- If groundwater is intersected during testing activities, the permittee shall quit digging and begin backfilling after the completion of documenting the gravel resource.

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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.

Current Conditions

Currently significant emission sources in the project area are from vehicles travelling on Pipe Creek Road and other adjacent roads. As well as emissions from heating homes and other buildings in the greater Libby area. Fugitive dust from adjacent lessee operations, a gravel pit and an application site for septage disposal contribute a varying amount of airborne particulate matter in the area.

Alternatives

No Action Alternative:

Direct Impacts: The selection of the no action alternative would not be expected to have any direct, secondary or cumulative impacts to air quality.

Action Alternative:

Direct Impacts: Fugitive dust would be generated from testing activities such as travelling to testing sites, digging test holes, and reclaiming test holes. The dust created from these activities is expected to be minimal and stay within direct vicinity of the source before settling. Wind velocities would introduce variability in dust dispersion in the area. Air quality could be temporarily impacted during testing activities; however, those impacts are expected to be short-term and negligible. The project is anticipated to create 0.1524 metric tons of carbon dioxide from the use of the anticipated 15 gallons of diesel fuel. There are no anticipated long-term impacts to air quality. Any impact to air quality resulting from the selection of the action alternative would be expected to correlate directly with testing operations which are expected to last one to two days.

Secondary Impacts: There are no secondary impacts expected to air quality resulting from the selection of the action alternative.

Cumulative Impacts: Air quality in the area can vary depending on the time of year due to seasonal weather patterns, wildfire smoke, heating of homes, and traffic within the area. The small amounts of additional dust and emissions beyond what is currently created by existing activities, is not expected to have appreciable impacts on the environment. Anticipated emissions could create 0.1524 metric tons of carbon dioxide from the use of the anticipated 15 gallons of diesel fuel. The additional impacts from testing activities would be expected to be negligible.

Duration: Impacts to air quality are expected to be short-term.

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.

Current Conditions

The proposed testing area canopy is covered by a coniferous forest comprising of lodgepole pine, Douglas-fir, western larch, grand fir and Ponderosa pine with Montane Grassland system below. Montane Grassland system is comprised of perennial bunch grasses and forbs, dominated by Rough Fescue.

An inventory of the Montana Natural Heritage Program's Species of Concern database was conducted for the project area. The search yielded no vegetative species of concern.

Alternatives

No Action Alternative:

Direct Impacts: The selection of the no action alternative would not be expected to have any direct, secondary, or cumulative impacts to vegetation cover quantity and quality.

Action Alternative:

Direct Impacts: The use of excavation equipment would temporarily damage some areas of the plant community; no trees would be impacted by the selection of the action alternative. The disturbance would occur from the vegetation being compacted and excavated by equipment. Per the stipulations of the permit, the proponent would be responsible for the management and mitigation of invasive weeds at the testing sites and on equipment travel routes. The proponent will also be responsible for reseeding the impacted areas with a native seed mixture, Lolo C Forest Mix. Overall, the impacts to vegetation cover, quantity and quality, including the species of concern would be expected to be minor. No appreciable changes to vegetation are expected to occur resulting from the selection of the action alternative.

Secondary Impacts: Secondary impacts may occur in the form of noxious weed propagation from testing sites. Weed impacts can be mitigated to negligible with proper efforts, such as monitoring and chemical treatment if necessary.

Cumulative Impacts: Noxious weed introduction and propagation is a serious concern throughout Montana. Mitigations must be considered for actions that could further exacerbate the problem. Mitigations are offered below and would be implemented within the testing permit if the action alternative is selected.

Duration: Impacts to vegetation cover, quantity and quality are expected to be short-term.

Mitigations

The potential selection of action alternative would include the following stipulation in the permit to test for aggregate:

- The Proponent will be responsible for the management, mitigation and elimination of invasive weeds introduced or propagated from testing activities. Such activities include digging and the transportation of equipment to and from each testing site.
- Trucks and testing equipment should be washed and inspected, prior to activities, to limit the possible spread of noxious weeds.
- The testing sites will be monitored by the proponent for a period of three growing seasons to ensure revegetation, and to accommodate any weed infestations within the test sites.
- The Proponent will be responsible for reseeding the affected areas with the certified weed free seed mixture, Lolo C Forest Mix, that can be found at Westland Seed, seed description below:

Broadcast Lbs/Ac	Variety
4	Annual Rygrass
4	Mountain Brome
5	Bluebunch Wheatgrass
3	Rough Fescue (Sub Idaho)
3	Idaho Fescue
5	Slender Wheatgrass
1	Prairie Junegrass

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.

Current Conditions

The project area maybe used by a variety of terrestrial and avian wildlife, including white-tailed deer, mule deer, elk, moose, black bears, grizzlies, coyotes, foxes, raptors, rodents, and songbirds. Generally, many of these species are common in the region. Proximity to Pipe Creek Road, residences, present commercial leases, and other forms of human disturbances have likely altered the usefulness of the project area by wildlife.

Alternatives

No Action Alternative:

The selection of the no action alternative would not be expected to have any direct, secondary or cumulative impacts to terrestrial, avian, and aquatic life and habitats.

Action Alternative:

Direct Impacts: The action alternative would create minor audible and visual disturbances for a short time frame to animals that occupy the project area or its surroundings. Wildlife may pass through the project area as part of their movements between habitats. Hiding cover and space to promote movement from the project area exists. As indicated earlier, disturbance in the vicinity, including the effects of Pipe Creek Road, human residences, various commercial lease activities, and other forms of human disturbance have likely impacted the ability of the area to be used for wildlife habitat. Given the current disturbances, many wildlife species have likely altered how they use the project area, and limit usage to times when human presence and disturbance is lessened, such as at night.

Similar habitat and forage can be found throughout the surrounding area and could sustain any impacted wildlife species temporarily. Grazing by domestic animals would continue. Only the impacts from gravel testing operations are evaluated within this analysis. Impacts to terrestrial, avian and aquatic life and habitat are expected to be minor.

Secondary Impacts: There are no secondary impacts expected to terrestrial, avian and aquatic life and habitats.

Cumulative Impacts: Cumulative impacts to terrestrial, avian and aquatic life and habitats would not be expected to appreciably change from the selection of the action alternative.

Duration: Impacts from the selection of the action alternative are expected to be short-term resulting in one to two days of increased activity within the project area.

Mitigations

The potential selection of action alternative would include the following stipulation in the permit to test for aggregate:

- Testing may only occur during daylight hours.

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.

Current Conditions

The Montana Natural Heritage Program's species of concern was conducted for the project area. The search yielded the following species of concern that have potential to be within the project area;

- Grizzly Bear – Grizzly Bears can be found throughout the much of western Montana in a variety of habitats that depend on the season, following food availability. The project area is approximately 0.75 miles from Cabinet-Yaak Ecosystem, Non-Recovery Occupied zone.
- Fisher – A medium-sized mammal occupying dense coniferous or mixed forests and tends to reside in tree hollows, under logs, in ground or rocky crevices or in the branches of conifers. The Fisher's diet consists of small mammals, birds, and fruit.
- Townsends Big-eared Bat – A native species of Montana found near caves, mines, rock outcrops and badlands.
- Great Blue Heron – A year-round resident of western and central Montana inhabit cottonwoods along major rivers and lakes.
- Great Gray Owl – A year-round resident of western Montana known to inhabit coniferous and hardwood forests foraging in wet meadows, forest, and meadows.
- Westslope Cutthroat Trout – One of two subspecies of native cutthroat found in the state. It has been designated as Montana's state fish. These species require cold water and seek out gravel substrates in riffles and pool crests for spawning habitat.
- Columbia River Redband Trout – A native of northwestern Montana found throughout streams, rivers and lakes. Preferring cool, clean, relatively low gradient streams.
- Torrent Sculpin – A native of northwestern Montana found in riffles of cold, clear streams.

Alternatives

No Action Alternative:

The selection of the no action alternative would not be expected to have any direct, secondary or cumulative impacts to unique, endangered, fragile or limited environmental resources.

Action Alternative:

Direct Impacts: The action alternative would create small, temporary, visual and audible disturbances for 1-2 days in the project area. Negligible changes to existing vegetation would occur, thus no appreciable changes in available habitats would be expected to occur. Some minor, short-duration disturbance to individuals of any of the above-mentioned species may occur if they are in the vicinity of the project area during testing activities. The action alternative would not be expected to impact species of concern beyond completion of the project.

Secondary Impacts: There are no secondary impacts expected to unique, endangered, fragile or limited environmental resources.

Cumulative Impacts: There are existing disturbances near the project area which include multiple gravel pits, a commercial lease, and several residences in proximity. All these disturbances have been present for long periods of time. The proposed activity would add to the disturbance, in a negligible and short-term manner. The additional impacts introduced from the selection of the action alternative are not expected to appreciably change cumulative impacts.

Duration: Impacts from the selection of the action alternative are expected to be short-term.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

Current Conditions

The DNRC archaeologist conducted a Class III cultural and paleontological resources inventory of the NE1/4 Section 16, T31N R31W. No cultural or paleontologic resources were identified. Proposed developments will have *No Effect* to *Antiquities* as defined under the Montana State Antiquities Act. A formal report of findings has been prepared and is on file with the DNRC and the Montana State Historic Preservation Officer.

Alternatives

No Action Alternative:

The selection of the no action alternative would not be expected to have any direct, secondary or cumulative No impacts to historical and archeological sites.

Action Alternative:

Direct Impacts: The selection of the action alternative would have no impact to antiquities as defined under the Montana State Antiquities Act. A formal report of findings has been prepared and is on file with the DNRC and the Montana State Historic Preservation Officer.
However, if previously unknown cultural or paleontological materials are identified during project related. activities, all work would cease until a professional assessment of such resources can be made.

Secondary Impacts: There are no secondary impacts expected, resulting from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected to historical and archeological sites from the selection of the action alternative.

Duration: No impacts are anticipated; therefore, the duration of impacts is not applicable.

Mitigations
The potential selection of action alternative would include the following stipulation in the permit to test for aggregate:

- If any cultural or paleontological resources are encountered during testing activities, all operations must stop, and the proponent shall contact DNRC.

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.

Current Conditions

The project area is currently comprised of vegetation as described in section 7 of this document, an area of forested land.
The current uses in the SE ¼ include active gravel mining and a commercial lease that uses 40 acres as a septage application. The current uses along with Pipe Creek road has significant impacts upon the audible aesthetics in the project area.

Alternatives

No Action Alternative:

The selection of the no action alternative would not be expected to have any direct, secondary or cumulative impacts to aesthetics.

Action Alternative:

Direct Impacts: An increase in noise from trucks and a single backhoe may be heard adjacent to the project area. From adjacent roads and public spaces, the testing may be visible although trees within the project area may shields activities from visibility and noise. The holes would be backfilled with the same substrate excavated during testing. Topsoil would then be spread upon the top of the disturbance and native grass seed would be spread by the proponent. The disturbance would be expected to remain visible for up to two growing seasons, while the disturbance is being revegetated. Noise impacts would be expected only during testing operations that will occur over a one- or two-day period. Upon reclamation, the site will be returned to a landscape consistent with the surroundings. Impacts to aesthetics are expected to be short-term and minor.

Secondary Impacts: There are no secondary impacts expected resulting from the selection of the action alternative.

Cumulative Impacts: Cumulative impacts in the form of added noise and visual disturbance would be expected to be negligible and short-term. Noise levels are expected to blend with the profile of motorists travelling on Interstate 90.

Duration: Noise impacts would be expected to only occur during testing operations. Visual impacts would be expected to last one or two growing seasons while the disturbances are revegetated.

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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.

Current Conditions

The composition of land, water and air is described within other sections of this document. Energy sources that would be required by the project are abundant in the area.

Alternatives

No Action Alternative:

The no action alternative would not be expected to have any direct, secondary or cumulative impacts on the demands on environmental resources of land, water, air or energy.

Action Alternative:

Direct Impacts: The proposed project would create individual test holes within a larger project area. The overall disturbances created within the project would be expected to have minor and short-term impacts on the environmental resources of the land. These impacts were identified in the vegetation and geology sections of this document. The expected impacts to water and air were identified earlier in this document. Energy resources in the area are abundant and any impact to energy resources would be expected to be negligible. The impact to other activities proposed is expected to be short term, as the proposed activities would span the course of one to two days. Impacts to other activities are further examined in section 13 of this document.

Secondary Impacts: There are no secondary impacts expected resulting from the selection of the action alternative.

Cumulative Impacts: Cumulative impacts for land, water and air are evaluated in their respective sections. There are no appreciable cumulative impacts expected to energy resources resulting from the selection of the action alternative.

Duration: Impacts of the selection of the action alternative are expected to be short-term.

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.

Current Conditions

The proposed project area has been actively managed as timber land by the Libby Unit office and the Forest Management Bureau. Directly south of the proposed project area is a permitted gravel pit and a commercial lease.

Alternatives

No Action Alternative:

The no action alternative would not be expected to have any direct, secondary or cumulative impacts to other environmental documents pertinent to the area.

Action Alternative:

Direct Impacts: The proposed project would create individual test holes within the project area. Testing activities would not inhibit future timber sales or the current gravel pit and commercial lease. Testing would only be expected to last one to two days.

Secondary Impacts: There are no secondary impacts expected resulting from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected resulting from the selection of the action alternative.

Duration: Impacts of the selection of the action alternative are expected to be short-term.

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.

Current Conditions

The current conditions of the tract pose no risk to human health or safety.

Alternatives

No Action Alternative:

The no action alternative would not be expected to have any direct, secondary, or cumulative impacts to human health or safety.

Action Alternative:

Direct Impacts: The proposed project is expected to have negligible impact to human health or safety, other than the occupational risks typically associated with aggregate testing machinery. The site is in a rural area away from residences. Impacts to air quality and water quality are evaluated in their respective resource sections of this document. During project activities there would be a minor increase in truck traffic and a single backhoe will be working within the project areas, the impact to human health and safety resulting from the selection of the action alternative is expected to be short-term and negligible as the activities would occur for one to two days with minimal increases in traffic.

Secondary Impacts: There are no secondary impacts expected resulting from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected resulting from the selection of the action alternative.

Duration: Impacts of the selection of the action alternative are expected to be short-term.

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15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

Current Conditions

The project areas are in a largely rural environment and industrial activities include gravel operations, commercial application of septage, and timber.

Alternatives

No Action Alternative:
The no action alternative would be expected to have any direct, secondary or cumulative impacts to industrial, commercial, and agricultural activities.

Action Alternative:

Direct Impacts: There are no direct impacts expected to industrial, commercial and agriculture activities resulting from the selection of the action alternative.

Secondary Impacts: There are no secondary impacts expected resulting from the selection of the action alternative.

Cumulative Impacts: There are no cumulative impacts expected resulting from the selection of the action alternative.

Duration: No impacts identified.

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16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.

Current Conditions

The closest town and employment center is Libby, Montana approximately 4.0 miles to the south of the project area.

Alternatives

No Action Alternative: The no action alternative is not expected to have any direct, secondary or cumulative impacts to the quantity and distribution of employment.

Action Alternative:
Direct Impacts: No direct impacts are expected to quantity and distribution of employment from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts could be expected.

Duration: No impacts identified.

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17. LOCAL AND STATE TAX BASE AND TAX REVENUES:
Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

Current Conditions

Trust land is exempt from local property tax. Operators and lessees conducting business on Trust Lands must pay business taxes.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary, or cumulative impacts on local and state tax bases or tax revenues.

Action Alternative:

Direct Impacts: No direct impacts to local and state tax base and tax revenue are expected from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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

Current Conditions

The traffic sources in the area are on Pipe Creek Road and other adjacent roads. Emergency services would likely come from Libby, MT.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary, or cumulative impacts on the demand for government services.

Action Alternative:

Direct Impacts: No direct impacts to the demand of government services are expected from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:
List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

Current Conditions

There are no known environmental plans or goals for this tract in the project vicinity.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary or cumulative impacts on locally adopted environmental plans or goals.

Action Alternative:

Direct Impacts: No impacts are expected to locally adopted environmental plans and goals from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.

Current Conditions

This site is not designated as wilderness, nor does it provide access to wilderness. Montana State Trust Lands are accessible for public use by purchasing the necessary conservation license through Montana Fish Wildlife and Parks.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary or cumulative impact on the access to and quality of recreational and wilderness activities.

Action Alternative:

Direct Impacts: The proposed project area does have public access through Bobtail Road which enters section 16 in the northwest quarter. Recreation accessibility is not expected to be hindered during testing activities. However, the quality of recreation sought by individuals visiting the tract may be impacted by the proposed activity. Impacts to recreation are expected to be minor and short-term and will only occur during testing activities.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: Impacts to recreation will occur during testing operations which would be expected to last 1-2 days.

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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.

Current Conditions

The closest population center to the project areas is Libby, MT.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary or cumulative impacts to the density and distribution of population and housing.

Action Alternative:

Direct Impacts: No direct impacts to the density and distribution of population and housing are expected from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

Current Conditions

The Flathead Reservation is approximately 114 miles to the southeast of the project area.

Alternatives

No Action Alternative:

The no action alternative is not expected to have any direct, secondary or cumulative impact to social structures, native or traditional lifestyles or communities.

Action Alternative:

Direct Impacts: No direct impacts are expected to native or traditional lifestyles.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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23. CULTURAL UNIQUENESS AND DIVERSITY:
How would the action affect any unique quality of the area?

Current Conditions

There are no known unique qualities of the area.

Alternatives:

No Action Alternative:

The no action alternative is not expected to have any direct, secondary or cumulative impact to cultural uniqueness or diversity.

Action Alternative:

Direct Impacts: No direct impacts are expected to the unique qualities of the area.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: No cumulative impacts expected.

Duration: No impacts identified.

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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.

Alternatives

No Action Alternative:

The $25 application fee would be retained by the Department. The denial of a testing permit would not be expected to generate potential future income from gravel. The other uses within section 16 would continue to generate revenue to the trust.

Action Alternative:

Direct Impacts: If the action alternative is selected the project would provide the trust with a $25.00 application fee. The results of testing would determine whether there is a viable resource for commercial gravel operations and help the Department and proponent understand potential assets present. Future revenue generating activity for the project area could include a gravel pit, current lessees. Gravel testing is not expected to hinder or impede any of the future potential in the project area. Social and economic circumstances are expected to be minor and short-term from the selection of the action alternative.

Secondary Impacts: No secondary impacts expected.

Cumulative Impacts: All funds generated from application fees go directly towards supporting Montana Trust Lands. While the $25 fee is minimal, it does contribute to an overall significant value attributed to the schools of Montana.

Duration: No impacts identified.

EA Checklist Prepared By:	**Name:** Thomas Palin	**Date:** June 14, 2024
	Title: Mineral Resource Specialist	

V. FINDING

25. ALTERNATIVE SELECTED:

The Action Alternative is selected.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The granting of the requested aggregate test permit pits on this tract of State Trust Lands is not expected to result in, nor cause significant negative environmental impacts. The proposed action satisfies the Trust's fiduciary mandate and ensures the long-term productivity of the land. An environmental assessment is the appropriate level of analysis for the proposed action.
I conclude that all identified potential impacts will be mitigated by utilizing permit requirements, including the stipulations listed below.

1. The permit holder shall be in compliance with 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.

2. Topsoil/sod will be stockpiled separately from subsoil for reclamation. The licensee shall fill holes with subsoil before covering them with topsoil and sod. All holes must be filled and reclaimed immediately prior to moving on to the next hole. No holes are to be left open overnight.

3. Geologic, geochemical/geophysical information (including but not limited to detailed sample site locations, areas disturbed by gravel pit testing, and sample results for each corresponding sample site) if collected for the tract will be provided to Minerals Management Bureau, TLMD MT-DNRC with a report on exploration activities. The lessee shall also concurrently provide GPS, GIS, or other data, detailed maps, and/or aerial photos associated with the associated permit to MMB. The licensee should advise the department if they consider this information confidential.

4. Testing will be limited to areas within the project area, see attached map Attachment A.

5. The permit holder agrees to avoid and not disturb historic buildings, foundations, or other cultural features on this tract. If any cultural or paleontological resources are encountered during testing activities, all operations must stop and the proponent shall contact DNRC.

6. The proponent will seed disturbances with Lolo C Forest Mix seed mix, before leaving project areas or at a time that will achieve successful germination. Seed mix below:

Broadcast Lbs/Ac	Variety
4	Annual Rygrass
4	Mountain Brome
5	Bluebunch Wheatgrass
3	Rough Fescue (Sub Idaho)
3	Idaho Fescue
5	Slender Wheatgrass
1	Prairie Junegrass

7. The Proponent will be responsible for the management, mitigation and elimination of invasive weeds introduced or propagated from testing activities for a period of three growing seasons. Such activities include digging and the transportation of equipment to and from each testing site.

8. All equipment utilized in testing activities must be regularly maintained and inspected to ensure it is not leaking fluids, spreading noxious weeds or creating an undue fire hazard.

9. If groundwater is intersected during testing activities, the permittee shall quit digging and begin backfilling after the completion of documenting the gravel resource.

10. Testing may only occur during daylight hours.

11. Testing activities shall only be conducted when the ground is dry or frozen to reduce potential for rutting.

12. The proponent will contact the DNRC at least 48 hours before project activities commence.

13. The proponent must obtain written permission through one of the following parties to access the testing area.
    - JMF Services Inc.
    - Noble Excavating, Inc.

14. Montana DNRC will coordinate with the other lessees within section 16.

15. If any damages to fences are incurred the proponent will fix damages.

16. Food, garbage, and other attractants will be stored in a bear-resistant manner.

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27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ]	EIS	[ ]	More Detailed EA	[X]	No Further Analysis

EA Checklist Approved By:	**Name:** Doug Turman **Title:** Libby Unit Manager	
Signature: Doug Turman	**Date:** 4/14/24	

Attachment A