

PROGRAMMATIC ENVIRONMENTAL ASSESSMENT

Project Name:	Programmatic Environmental Assessment – Non-Mechanized Mineral Exploration Land Use Licenses
Proposed Implementation Date:	Fall 2026
Proponent:	DNRC – Trust Lands Management Division
Location:	Statewide
County:	NA
Trust:	NA

I. TYPE AND PURPOSE OF ACTION

The Montana Department of Natural Resources and Conservation (the Department or DNRC) through its Minerals Management Bureau (MMB), manages the mineral exploration and extraction (aggregate, metalliferous, nonmetalliferous, coal, and oil and gas) program on State of Montana School Trust Lands (trust lands). As part of this program, the MMB is responsible for evaluating and either granting or denying Land Use Licenses (LUL). An LUL can be utilized for a variety of permissions on Trust Lands, they are commonly used as a catch-all license for activities that aren’t specifically authorized by other leases, licenses, or permits. Non-mechanized mineral exploration LUL activities include mapping, geochemical, geophysical, and rock sampling for minerals. The use of machinery or extraction of minerals are not allowed through this license. This programmatic analysis relates only to applications and the evaluation of “non-mechanized mineral exploration” LUL’s.

Proponents shall not, during the term of the LUL or any continuation thereof, remove any gems and/or metalliferous or non-metalliferous minerals from the licensed premises except in small quantities for test purposes or as may be permitted by the Department.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED: <i>Provide a brief chronology of the scoping and ongoing involvement for this project.</i>

- The MMB conducted an internal scoping period to identify potential resource concerns that are important to local area staff and other Trust Land Bureaus.
- On May 15, 2026, the MMB published an external 30-day scoping document and public notice on the DNRC website that solicits public comment to inform this analysis. A legal notice for public comment was published in both the Helena IR on May 21st and 28th, 2026, and the Billings Gazette on May 20th and 28th, 2026.
- No comments were received during the initial scoping notice.
- A draft version of this document will be published for public review. Depending upon the comments received, a public hearing may be held.
- All comments received will be read and responded to either directly or categorically.

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

- None

3. ALTERNATIVES CONSIDERED:

No Action Alternative: The “No Action Alternative” would reject the adoption of this programmatic analysis for non-mechanized mineral exploration on State of Montana Trust Lands. Each application for non-mechanized mineral exploration would be analyzed as it currently is – via a narrative environmental assessment.

Action Alternative: The “Action Alternative” programmatic analysis would be adopted by the Minerals Management Bureau and serve as a basis for all non-mechanized mineral exploration applications over the next ten years. A list of standard stipulations that would be applied to all nonmechanized mineral exploration permits will be created, and a checklist for unique and project specific considerations would also be developed and utilized in place of a narrative EA.

SUMMARY OF POTENTIAL IMPACTS:

The impact analysis will identify and estimate whether the impacts are direct or secondary impacts. Direct impacts occur at the same place as the action that causes the impact. Secondary impacts are a further impact to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts will be described.

Cumulative impacts are the collective impacts on the human environment within the borders of Montana of the proposed action when considered in conjunction with other past and present actions related to the proposed action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through preimpact statement studies, separate impact statement 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
• <i>RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.</i> • <i>Explain POTENTIAL IMPACTS AND MITIGATIONS following each resources heading.</i> • <i>Enter “NONE” if no impacts are identified or the resource is not present.</i>

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: <i>Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils</i>

Alternative

No Action Alternative: The geology, soil quality, and moisture would continue to be elevated on a site-by-site basis within a narrative EA.

Action Alternative:

Direct Impacts: Geology and soil quality, stability and moisture vary widely across the State of Montana. However, despite the uniqueness from site to site, the impacts from non-mechanized mineral exploration to these resources are largely consistent throughout the state. Non-Mechanized mineral exploration does not alter the soil or geology in any meaningful way. Some minor amounts of soil may be displaced from the manual removal of topsoil with handheld shovels. Any topsoil removed by non-mechanized means, are stored and used to reclaim the disturbance to pre-exploration quality and stability. Overall impacts are short-term and negligible. In areas where soils are more susceptible to erosion or loss, the Minerals Management Bureau typically implements customized stipulations to mitigate impacts.

Secondary Impacts: No secondary impacts are expected from non-mechanized LUL activities.

Cumulative Impacts: Cumulative impacts to geology and soil quality from non-mechanized mineral exploration are expected to be negligible. Non-mechanized mineral exploration does not impact a large enough area to change the cumulative impacts of geology or soil. Non-mechanized mineral exploration is the first step in determining whether a viable resource is present to mine metalliferous and/or nonmetalliferous material for commercial and industrial projects. Should viable resources be determined, further mineral exploration, extraction, or development may occur, these actions would be evaluated through a separate analysis.

Duration: Non-mechanized mineral exploration Land Use Licenses may be issued for up to five years. The disturbances created from the non-mechanized exploration are backfilled and blended immediately after the hole has been excavated. Impacts on geology and soil quality, stability, and moisture are short-term.

Standard Stipulations:

The following stipulations are proposed as standard mitigations, which means they would be incorporated into all future nonmechanized if the action alternative is selected:

- The licensee shall only conduct non-mechanized exploration under dry or frozen conditions.
- No non-mechanized exploration shall occur in areas where the slope is steeper than 4:1 ratio.
- All vehicle traffic, including trucks and ATV’s, must stay on established roads/trails unless written authorization for off-road/trail travel is provided by the Department in writing. 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.
- Topsoil/sod will be stockpiled separately from subsoil for reclamation. The Licensee shall fill in holes with subsoil before covering with topsoil and sod. All exploration holes must be reclaimed immediately upon completion, and exploration results must be logged.

EA Checklist Items:

The following checklist items are proposed for the checklist EA review that would occur for each application if the action alternative is selected:

- Will the project impact on any unique geologic features?
 - o Yes - *Further evaluation is required.*
 - o No – *This project will not impact any unique geological features.*

5. WATER QUALITY, QUANTITY AND DISTRIBUTUION:
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. Identify cumulative effects to water resources.

Alternatives

No Action Alternative:

The water quality, quantity and distribution would continue to be evaluated on a site-by-site basis within a narrative EA.

Actional Alternative:

Direct Impacts: Nonmechanized exploration is not expected to have any direct impacts on water quality, quantity or distribution.. It is highly unlikely that groundwater will be encountered during non-mechanized LUL activities. A standard stipulation will be adopted that requires a setback of 100 feet from any surface water for licensed activities. By utilizing this standard stipulation in all licenses, no impacts are expected to surface water quality or quantity.

Secondary Impacts: There are no secondary impacts to groundwater or surface water quantity, quality or distribution from non-mechanized mineral exploration.

Cumulative Impacts: There are no changes to cumulative impacts to water quality or quantity from non-mechanized mineral exploration.

Duration: No impacts are expected, therefore duration is not applicable.

Standard Stipulations:

The following stipulations are proposed as standard mitigations, which means they would be incorporated into all future nonmechanized if the action alternative is selected:

- The licensee shall abide by a 100-foot buffer from all surface water including wetlands.

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.

Alternatives

No Action Alternative: Air quality would continue to be evaluated on a site-by-site basis using a narrative EA.

Action Alternative

Direct Impacts: Non-mechanized mineral exploration creates negligible impacts to air quality. When the licensee hand-digs a test hole limited to a maximum two feet by two feet opening, small amounts of dust may propagate from the site if it is windy. Typically, the dust settles within 100 yards of the site, but small dust particles may be carried further in high winds. Dust concentrations become more dispersed as they move further away from the site. Impacts related to dust dispersion from exploration are negligible.

Non-mechanized mineral exploration operations utilize hand tools such as shovels, trowels, rock hammers, drones, and handheld instruments. Vehicle and ATV/4-wheeler may be used by the proponent to travel to and from the licensed location. Combustion engine vehicles used for transportation to and from the licensed site, emit carbon dioxide exhaust. According to the US Energy Information Administration, 22.45 pounds of CO2 are emitted for each gallon of diesel fuel burned. Fuel consumption would be expected to be less than 50 gallons of diesel or gasoline for all equipment utilized in exploration operations. 50 gallons of diesel usage would equate to 1,123 pounds of CO2 or 0.51 metric tons. The impacts resulting from the burning of diesel fuel needed to complete non-mechanized mineral exploration are anticipated to be negligible.

Secondary Impacts: Both dust and emissions from exploration operations may extend beyond the project site. The relation of concentration of either dust or CO2 is expected to be inverse to the distance from the site. As the distance from the exploration site increases, the concentration of dust or CO2 from project operations will decrease. Concentrations at distances beyond the borders of the immediate exploration sites are expected to be low enough that they would create negligible impacts to air quality.

Cumulative Impacts: Overall, Montana has good to great air quality most times of the year. Some seasonal circumstances may degrade air quality, such as wildfire season and the heating of homes in the winter. Non-mechanized mineral exploration activities are not expected to appreciably change cumulative impacts to air quality. Emissions from project activities would add to the global emissions in a negligible manner.

Duration: Impacts to air quality from non-mechanized mineral exploration operations are both short-term and long-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.

Alternatives

No Action Alternative: Impacts to vegetation cover, quantity and quality would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative

Direct Impacts: During non-mechanized mineral exploration hand-dug disturbances are limited to a maximum two feet by two feet. This activity is expected to temporarily disturb overlying vegetation along with the topsoil. After measurements and samples are taken, the substrate is put back into the hole and topsoil is spread on top of the disturbance. Vegetation where the ground is disturbed from non-mechanized exploration may die. However, the organic matter is expected to be retained, and the disturbance would be seeded with a seed mixture prescribed by the DNRC unit office. The disturbance would also be monitored for weed introduction and propagation. It would be the responsibility of the licensee to mitigate and eliminate weed growth resulting from testing operations. The disturbance may be present for one to two growing seasons as the site is revegetated. Upon reclamation, the site is expected to return to its original productivity. Travelling from test site to test site in trucks or ATVs may temporarily damage vegetation. These areas would be expected to recover within one

growing season. Depending upon the season, there may be some risk of sparking wildfire. The proponent should always have a fire-extinguisher with them during licensed operations. The Department will reserve the right through a standard stipulation to postpone or limit testing to mitigate wildfire risks. Overall, the impacts to vegetation cover, quantity and quality from non-mechanized mineral exploration are minor.

Secondary Impacts: There are no secondary impacts to vegetation cover, quantity, and quality from non-mechanized mineral exploration. All disturbances to vegetation occur within the project area and are therefore direct impacts.

Cumulative Impacts: Noxious and invasive weeds are a significant problem in Montana and considerations should be taken to avoid the spread of these species. Non-mechanized mineral exploration operations have the potential to spread and propagate noxious and invasive weeds. However, mitigations such as equipment maintenance and washing can help prevent the introduction or spread of weeds. If the testing site remains undeveloped after testing, it is important to monitor the introduction of noxious and invasive species. While non-mechanized exploration itself has little impact on vegetation cover, quality, and quantity, if a viable resource is determined to be present, further mineral extraction development could have a significant impact on vegetation cover, quality, and quantity. Should the results of the non-mechanized mineral exploration lead to additional applications to further develop a resource, the impacts to vegetation cover, quality, and quantity would be evaluated in a separate assessment.

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

Standard Stipulations:

The following stipulations are proposed as standard mitigations, which means they would be incorporated into all future non-mechanized mineral exploration permits if the action alternative is selected:

- The Licensee shall inspect, wash, and maintain all equipment being utilized in non-mechanized exploration prior to commencing and during all non-mechanized exploration work. This is to reduce the spread of noxious weeds; mitigate chemical spills and leaks; and minimize fire hazards.
- The licensee shall be responsible for the elimination of noxious and invasive weeds that are introduced or exacerbated resulting from licensed activities.
- The licensee shall keep a fire extinguisher readily available during the exploration activities. A fire caused by exploration operations is the sole responsibility of the licensee. The Department may postpone operations if they are deemed as a fire risk.
- Topsoil/sod will be stockpiled separately from subsoil for reclamation. The Licensee shall fill in holes with subsoil before covering with topsoil and sod. All exploration holes must be reclaimed immediately upon completion, and exploration results must be logged and provided to the Department upon completion.

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.

Alternatives

No Action Alternative: Impacts to Terrestrial, Avian and Aquatic Life and Habitats would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative

Direct Impacts: Non-mechanized mineral exploration may occur in a variety of environmental settings including rangeland settings and timbered areas. No trees would be cut down or damaged by non-mechanized mineral exploration. The impacts on wildlife and their habitat would be minor. The removal of some forage and potential cover is expected to occur during licensed activities. However, as described within the previous section of this analysis, vegetation is expected to regrow within one to two seasons. Non-mechanized mineral exploration activities could temporarily disrupt wildlife movement and patterns. However, the minimally invasive exploration methods allowed by the license are expected to produce minor impacts.

Temporary visual and audible disturbances may occur to a variety of species in any given exploration area. However, these disturbances would be during daylight hours. Wildlife would be expected to return to the exploration area several hours to days after exploration has been completed. The areas adjacent to the exploration areas would be expected to be able to temporarily sustain any wildlife impacted by the non-mechanized mineral exploration operations. Impacts to wildlife species and their habitat are expected to be minor.

Secondary Impacts: The wildlife that is temporarily displaced by non-mechanized mineral exploration operations would be expected to move to other suitable habitat in the general vicinity of the project. The nearby habitat would be expected to sustain the displaced wildlife species temporarily. The secondary impacts to wildlife and their habitat are expected to be minor.

Cumulative Impacts: Typically, non-mechanized mineral exploration occurs close to current human disturbances such as roads, where wildlife have been conditioned to human presence. Due to the small relative disturbance, exploration operations would not be expected to significantly change the current cumulative impacts to wildlife in the testing areas. While non-mechanized exploration itself has little impact on terrestrial, avian, or aquatic habitats, if a viable resource is determined to be present, further mineral extraction development could have a significant impact on terrestrial, avian, and aquatic habitats. Should the results of the non-mechanized mineral exploration lead to further applications to develop the resource, the impacts to terrestrial, avian, or aquatic habitats would be evaluated in a separate analysis.

Duration: The duration of impacts to wildlife from testing operations would be short-term.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:
Consider substantial habitat values and use of the area by wildlife, birds, or fish. Identify cumulative effects to fish and wildlife.

Alternatives

No Action Alternative: Impacts to unique, endangered, fragile or limited environmental resources would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative

Direct Impacts: Non-mechanized mineral exploration operations may temporarily disturb unique, endangered, fragile or limited environmental resources. The MMB utilizes the Montana Natural Heritage Map Viewer to determine if any endangered species or species of concern have species occurrences within the project area. This should continue to occur if the action alternative is chosen, and a checklist EA is implemented for future non-mechanized mineral exploration. A checklist item should be created to list all the species of concern in the project area. Any listed species of concern should be evaluated further for the impacts that licensed activities may have on the species.

In 2010 the Montana DNRC implemented a multi-species habitat conservation plan (HCP) to address the potential take of federally listed species on forested state trust lands managed by the Trust Lands Management Division, now the Forestry and Trust Lands Division of the Montana DNRC. The HCP was developed to protect five species listed under the Endangered Species Act: grizzly bear, Canada lynx, bull trout, west slope cutthroat trout and interior Redband trout. If the action alternative is selected and a checklist EA is implemented for future non-mechanized mineral exploration, one of the items within the checklist should determine whether the testing site is within the project area covered by the HCP. If the testing site is contained within the boundaries of the HCP, further and more detailed evaluation regarding the impacts of testing within the boundary of the HCP shall occur.

Montana contains large areas of Sage Grouse Habitat. Projects that occur in Sage Grouse Habitat must be reviewed by the Montana Sage Grouse Habitat Conservation Program. If the action alternative is selected and a checklist EA is implemented, an item within the checklist should determine whether the testing site is contained within Sage Grouse Habitat.

The Montana DNRC observes the National Bald and Golden Eagle Management Plan and requires a half-mile setback from Bald and Golden Eagle nests during nesting season which occurs from February 1 to August 15. If the action alternative is selected and a checklist EA is implemented, an item within the checklist should determine whether the testing site is within one-half mile of an active eagle nest.

Secondary Impacts: Some disturbance may occur to sensitive species or species of concern if they are in the vicinity of non-mechanized mineral exploration during the time when exploration operations occur. Visual and audible disturbances may cause individuals of these species to seek areas outside of the direct testing area. The habitat and forage in the surrounding areas would be expected to sustain any displaced individuals during testing operations. Upon cessation of testing, the impacted individuals would be expected to return. Overall, secondary impacts to unique, endangered, fragile or limited environmental species would be expected to be minor.

Cumulative Impacts: Non-mechanized mineral exploration is not a substantive enough action to discernably change cumulative impacts to unique, endangered, fragile, or limited environmental resources. Non-mechanized mineral exploration may be the first step in determining whether a viable resource is present to mine metalliferous and/or nonmetalliferous material for commercial and industrial projects. Should viable resources be determined,

further mineral extraction development may be pursued by the exploration Licensee. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to the unique, endangered, fragile or limited environmental resources would be evaluated appropriately through an additional analysis.

Duration: The duration of impacts from non-mechanized mineral exploration to unique, endangered limited or fragile environmental resources would be expected to be short-term.

EA Checklist Items

Current Conditions:

List an inventory of the Montana Natural Heritage Program’s Species of Concern:

- Identify the impacts that the licensed activities would have on the species of concern listed.

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

- Yes, further evaluation required
- No – *This project is not located within designated Greater Sage Grouse General, Core or Connectivity Habitat.*

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

- Yes, consultation is required through the MT Sage Grouse Habitat Conservation Program.
- No – *This project is not located within designated Greater Sage Grouse General, Core or Connectivity Habitat.*

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

- Yes, further evaluation is required.
- No – *This project area is not within one-half mile of an active Bald or Golden Eagle Nest.*

10. HISTORICAL AND ARCHAEOLOGICAL SITES: <i>Identify and determine effects to historical, archaeological or paleontological resources.</i>
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Alternatives

No Action Alternative: Impacts to historical and archeological sites would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts, Secondary, and Cumulative Impacts: Impacts to historical and archeological sites vary significantly based upon the project’s location, which is dissimilar from many of the other resource sections in this document. The DNRC’s staff archeologist was consulted for his comments for this programmatic assessment. He determined that non-mechanized mineral exploration has such minimal ground disturbance that the potential to disturb historical or archeological sites is extremely low. If the action alternative is selected, the license should contain a standard stipulation that requires the licensee to stop work and contact the Department if any archeological or paleontological resources are discovered.

Duration: There are no impacts expected, therefore duration is not applicable.

Standard Stipulations:

The following stipulations are proposed as standard mitigations, which means they would be incorporated into all future nonmechanized if the action alternative is selected:

- If any previously unidentified historical, archaeological and paleontological resources are encountered during exploration, the licensee shall avoid disturbing these resources, shall stop work, and immediately contact the DNRC’s archaeologist. Work may only continue after a professional assessment of the site is made by the Department’s archaeologist. The Licensee agrees to avoid any previously identified archaeological, paleontological, and/or cultural features.

11. AESTHETICS:

Determine if the project is located on the 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.

Alternatives

No Action Alternative: Impacts to aesthetics would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration creates minor and temporary disturbances to aesthetics. During exploration operations, noise is emitted by trucks and ATV's utilized to travel to and from the licensed location, and non-mechanized equipment such as shovels, pickaxes, and hand-held core drills. The noise created by this equipment is minor and short-term. The exploration equipment may also be visible to the public from adjacent roads or property. At the completion of exploration, the aesthetics of the site are returned to pre-exploration levels. Minor ground disturbance may be present where the exploration took place. These disturbances will remain visible until they are revegetated, which was explained further in section seven of this document. Impacts to aesthetics would be minor during non-mechanized mineral exploration. Transportation to and from exploration sites would be on existing trails/roads. The areas where hand tools are used in the exploration process are reclaimed to their original aesthetic within the timeframe prior to the expiration of the Land Use License.

Secondary Impacts: Non-mechanized mineral exploration is not expected to have any secondary impacts on aesthetics.

Cumulative Impacts: Non-mechanized mineral exploration would not be expected to appreciably change the cumulative impacts to aesthetics in any given area. Non-mechanized mineral exploration may be the first step in determining whether a viable resource is present to mine metalliferous and/or nonmetalliferous material for commercial and industrial projects. Should viable resources be determined, further mineral extraction development may occur by the exploration Licensee. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to aesthetics would be evaluated in a separate analysis.

Duration: The duration of impacts to aesthetics from non-mechanized mineral exploration are short term.

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.

Alternatives

No Action Alternative: Impacts to demand on environmental resources of land, water, air or energy would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: The impacts to land, water and air have already been analyzed within this document. The project would utilize energy in the form of either gasoline or diesel fuel. Both of these energy resources are abundant throughout most of Montana. The fuel required for non-mechanized mineral exploration is expected to have negligible impacts to limited energy resources.

Secondary Impacts: Non-mechanized mineral exploration is not expected to have secondary impacts to energy. Impacts to land, water, and air are evaluated in previous sections of this document.

Cumulative Impacts: Non-mechanized mineral exploration may have negligible cumulative impacts to energy resources. As mentioned above, the machinery used in testing requires fuel to operate. Diesel Fuel and gasoline are made from non-renewable resources. However, currently, fuel is abundant and readily available throughout Montana. Non-mechanized mineral exploration does not utilize enough fuel for it to make appreciable changes to cumulative impacts.

Non-mechanized mineral exploration is the first step in determining whether a viable resource is present to mine metalliferous and/or nonmetalliferous material for commercial and industrial projects. Should viable resources be determined, further mineral extraction development may be of interest by the Licensee. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the demands on

environmental resources of land, water, air or energy would be evaluated appropriately for the proposed development.

Duration: The duration of impacts to energy resources from non-mechanized mineral exploration would 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.

Alternatives

No Action Alternative: Impacts to other environmental documents pertinent to the area would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct, Secondary and Cumulative Impacts: Non-mechanized mineral exploration may have some impact upon other studies, plans or projects on the tract. If the action alternative is selected and a checklist EA is implemented to review future non-mechanized mineral exploration applications, the checklist EA should contain an item determining whether there are other projects, studies, or plans on the tract. If there are, the author shall determine the impacts (Direct, Secondary, and Cumulative) that non-mechanized mineral exploration will have on the current activities.

Duration: If impacts on other studies, plans or projects are anticipated, then there should be a consideration of the duration of those impacts. If there are no other studies, plans, or projects, the duration would not be applicable.

EA Checklist Items

The following checklist items are proposed for the checklist EA review that would occur for each application if the action alternative is selected.

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

- If yes, please explain the impacts non-mechanized mineral exploration would have.
- No

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 resources 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.

Alternatives

No Action Alternative: Impacts to human health and safety would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Impacts to human health and safety from non-mechanized mineral exploration operations are limited to occupational safety and health to the employees of the licensed company or individual. It is the responsibility of the licensee to follow occupational safety and health guidelines associated with operating vehicles and non-mechanized equipment. Impacts can be mitigated to minor or negligible for those participating in exploration with proper occupational safety and health measures implemented by the licensee. All risks to human health and safety are assumed by the proponent who is responsible for mitigating the potential for accident and injury.

There are no impacts to human health or safety risks to individuals who are not actively participating in non-mechanized mineral exploration operations. Exposure levels to noise or any other harmful substances would not meet a threshold of concern for health risks.

Secondary Impacts: There are no secondary impacts to human health and safety that would result from non-mechanized mineral exploration operations.

Cumulative Impacts: There is no change to cumulative impacts to human health and safety that would result from non-mechanized mineral exploration operations. Non-mechanized mineral exploration may be the first step in determining whether a viable resource is present to mine metalliferous and/or nonmetalliferous material for commercial and industrial projects. Should viable resources be determined, further mineral extraction development may occur by the exploration Licensee. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to health and safety would be evaluated in a separate analysis.

Duration: The impacts to human health and safety for the employees of the licensee, those conducting the exploration activities, would be short-term and only occur during active exploration operations.

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

Alternatives

No Action Alternative: Impacts to industrial, commercial and agriculture activities would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration may have negligible impacts on agricultural activities. The exploration activities temporarily disturb vegetation as described in previous sections of this document. Exploration may be conducted in fields that are planted with hay or other crops. The disturbances will slightly decrease the available forage for cattle or other livestock grazing. Exploration activities are not large enough to significantly impact the availability of forage or damage crops. By law, the State of Montana Trust Lands’ surface lessee is entitled to real and actual damages created by exploration activities. However, the result of exploration activities are typically so minimal that a monetary transfer is not made between the non-mechanized licensee and the surface lessee. Coordination between the Licensee and Surface Lessee may also take place before or after grazing and/or agricultural activities are completed on the tract for the year. Damages shall be negotiated between the non-mechanized exploration licensee and the surface lessee.

Secondary Impacts: Non-mechanized mineral exploration are not expected to have any secondary impacts on industrial, commercial and agricultural activities.

Cumulative Impacts: Non-mechanized mineral exploration does not appreciably change the cumulative impacts to industrial, commercial or agricultural activities. While non-mechanized exploration itself has little impact upon industrial or commercial activities, if a viable resource is determined to be present, further mineral extraction development and a future mine could have a significant impact upon industrial, commercial and agriculture activities and production.

Duration: The duration of impacts to industrial, commercial and agricultural activities from Non-mechanized mineral exploration would be short-term.

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

Alternatives

No Action Alternative: Impacts to quantity and distribution of employment would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration operations do not impact the quantity and distribution of employment.

Secondary Impacts: Non-mechanized mineral exploration operations do not have secondary impacts to the quantity and distribution of employment.

Cumulative Impacts: Non-mechanized mineral exploration operations would not change the cumulative impact to the quantity and distribution of employment. Non-mechanized mineral exploration can lead to future development

of mineral resources. If a viable resource is determined to be present, further mineral extraction development and a future mine could have a significant impact on the quantity and distribution of employment.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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.

Alternatives

No Action Alternative: Impacts to local and state tax bases and revenues would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration operations would not have any impact to local and state tax base and revenue.

Secondary Impacts: Non-mechanized mineral exploration operations would not have any secondary impacts to local and state tax base and revenue.

Cumulative Impacts: Non-mechanized mineral exploration operations would not change the cumulative impact to local and state tax base and revenue. Non-mechanized mineral exploration can lead to future development of mineral resources. Additional development based on the result of non-mechanized mineral exploration could lead to impacts to the local and state tax base and revenue. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to the local and state tax base and tax revenue would be evaluated appropriately for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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.

Alternatives

No Action Alternative: Impacts to demands for government services would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration operations would not have any direct impact to demand for government services.

Secondary Impacts: Non-mechanized mineral exploration operations would not have any secondary impact to demand for government services.

Cumulative Impacts: Non-mechanized mineral exploration operations would not have any change to cumulative impacts to demand for government services. Non-mechanized mineral exploration can lead to future development of mineral resources. Additional development based on the result of non-mechanized mineral exploration could lead to impacts to the local economic and social dynamics of the surrounding communities, which may lead to an increased demand for Government Services. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to the demands for government services would be evaluated appropriately for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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.

Alternatives

No Action Alternative: Impacts to demands on locally adopted environmental plans and goals would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts, Secondary and Cumulative Impacts: Non-mechanized mineral exploration operations typically have negligible on locally adopted environmental plans, however if the action alternative is selected and a checklist EA is implemented, an item should be created on the checklist EA to determine whether the proposed site has any locally adopted environmental plans or goals. If the answer is no, there is no need for further analysis. If the answer is yes, further analysis should be conducted.

Duration: Duration is only applicable if impacts occur. Duration shall be analyzed if it is determined that impacts will occur.

EA Checklist Items

The following checklist items are proposed for the checklist EA review that would occur for each application if the action alternative is selected:

Are there any locally adopted environmental plans and goals for the tracts upon which non-mechanized mineral exploration is proposed?

- Yes - *Evaluate the impacts to these plans or goals that non-mechanized mineral exploration would create.*
- No - *No further evaluation is required.*

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational area 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.

Alternatives

No Action Alternative: Impacts to access to and quality of recreational and wilderness activities would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration does have minor impacts to quality recreational activities, but has negligible upon activities in wilderness areas, as there are no State of Montana Trust Lands contained in wilderness areas. Non-mechanized mineral exploration Land Use License may be issued for up to five years. During which handheld non-mechanized tools, such as shovels, trowels, rock hammers, drones, and handheld instruments would be used in collecting soil, stream sediment, biogeochemical, surface water, and rock samples are to be collected in small amounts. During active exploration periods, exploration activities may impact the quality of recreation sought by any individual or groups of people looking to recreate on the same lands that are being tested. Areas where exploration activities are being conducted are not closed for recreation, however, there may be temporary and minor disturbances. After exploration is completed, access to and quality of recreation are expected to return to pre-exploration conditions. Overall, the impacts to recreation are expected to be minor.

Secondary Impacts: Non-mechanized mineral exploration is not expected to have any secondary impacts on recreational and wilderness activities.

Cumulative Impacts: There is no discernible change in cumulative impacts to access to and quality of recreational and wilderness activities from non-mechanized mineral exploration. While non-mechanized exploration itself has little impact upon industrial or commercial activities, if a viable resource is determined to be present, further mineral extraction development and a future mine could have a significant impact upon access to and quality of recreational and wilderness activities. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to the access to and quality of recreational and wilderness activities would be evaluated in an additional analysis for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

21. DENSITY AND DISRIBUTION OF POPULATION AND HOUSING:
Identify any wilderness or recreational area 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.

Alternatives

No Action Alternative: Impacts to density and distribution of population and housing would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration has negligible impacts on the density and distribution of population and housing.

Secondary Impacts: There are no secondary impacts to density and distribution of population and housing from non-mechanized mineral exploration.

Cumulative Impacts: There is no discernible change in cumulative impacts to density and distribution of population and housing from non-mechanized mineral exploration. While non-mechanized exploration itself has little impact upon industrial or commercial activities, if a viable resource is determined to be present, further mineral extraction development and a future mine could have a significant impact upon density and distribution of population and housing. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to density and distribution of population and housing would be evaluated in an additional assessment for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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

Alternatives

No Action Alternative: Impacts to social structures and mores would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration has no impact to social structures and more.

Secondary Impacts: There are no secondary impact to social structures and more from non-mechanized mineral exploration.

Cumulative Impacts: There is no discernible impact on cumulative impacts to social structures and more from non-mechanized mineral exploration. While non-mechanized exploration itself has little impact upon social structure and more, if a viable resource is determined to be present, further mineral extraction development and a future mine could have a significant impact. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to social structure and more would be evaluated in an additional analysis for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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

Alternatives

No Action Alternative: Impacts to cultural uniqueness and diversity would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Non-mechanized mineral exploration has no impacts on cultural uniqueness and diversity.

Secondary Impacts: There are no secondary impacts to cultural uniqueness and diversity from non-mechanized mineral exploration.

Cumulative Impacts: There is no discernible change in cumulative impacts to cultural uniqueness and diversity from non-mechanized mineral exploration. If a viable resource is determined to be present, further mineral extraction development and a future mine could have significant impacts upon cultural uniqueness and diversity. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to cultural uniqueness and diversity would be evaluated in an additional analysis for the proposed development.

Duration: No impacts were identified for the non-mechanized mineral exploration; therefore, duration is not applicable.

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: Impacts to other appropriate social and economic circumstances would continue to be evaluated on a site-by-site basis through a narrative EA.

Action Alternative:

Direct Impacts: Each non-mechanized mineral exploration land use license generates a 25-dollar application fee.

Secondary Impacts: Non-mechanized mineral exploration has no secondary impacts on social and economic circumstances.

Cumulative Impacts: There is no discernible change in cumulative impacts to social and economic circumstances from non-mechanized mineral exploration. Non-mechanized mineral exploration can lead to future development of mineral resources. This could lead to impacts for the local economic and social dynamics of the surrounding communities. Mineral development may also produce income for the designated Trust beneficiaries through royalties. Should the results of the non-mechanized mineral exploration lead to applications to further develop a resource, the impacts to social and economic circumstances may be significant and would be evaluated in an additional analysis for the proposed development.

Duration: Non-mechanized mineral exploration application fees are distributable, so the duration of economic impacts to the Trust Beneficiaries are short-term.

Programmatic EA Prepared By:	Name: Kelly Bertellotti Title: Mineral Resource Specialist	Date: 9/14/2026
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APPENDIX A: List of Standard Stipulations for future non-mechanized mineral exploration Land Use Licenses, if action alternative is selected.

The following stipulations are proposed as standard mitigations, which means they would be incorporated into all future nonmechanized if the action alternative is selected:

- The Licensee shall only conduct non-mechanized exploration under dry or frozen conditions.
- No non-mechanized exploration shall occur in areas where the slope is steeper than 4:1 ratio.
- All vehicle traffic, including trucks and ATV’s, must stay on established roads/trails unless written authorization for off-road/trail travel is provided by the Department in writing. 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.
- Topsoil/sod will be stockpiled separately from subsoil for reclamation. The Licensee shall fill in holes with subsoil before covering with topsoil and sod. All exploration holes must be reclaimed immediately upon completion, and exploration results must be logged and provided to the Department upon completion.
- The Licensee shall abide by a 100-foot buffer from all surface water including wetlands.
- The Licensee shall inspect, wash, and maintain all equipment being utilized in non-mechanized exploration prior to commencing and during all non-mechanized exploration work. This is to reduce the spread of noxious weeds; mitigate chemical spills and leaks; and minimize fire hazards.
- The Licensee shall be responsible for the elimination of noxious and invasive weeds that are introduced or exacerbated resulting from licensed activities.

- The Licensee shall keep a fire extinguisher readily available during the exploration activities. A fire caused by exploration operations is the sole responsibility of the licensee. The Department may postpone operations if they are deemed as a fire risk.
- If any previously unidentified historical, archaeological and paleontological resources are encountered during exploration, the licensee shall avoid disturbing these resources, shall stop work, and immediately contact the DNRC’s archaeologist. Work may only continue after a professional assessment of the site is made by the Department’s archaeologist. The Licensee agrees to avoid any previously identified archaeological, paleontological, and/or cultural features.

APPENDIX B: EA Checklist Analysis document if action alternative is selected:

CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:
Proposed Implementation Date:
Proponent:
Location:
County:
Trust:

I. TYPE AND PURPOSE OF ACTION

Introduction: In the spring 2026, the Minerals Management Bureau of the Forestry and Trust Lands Division of the Montana DNRC, completed a programmatic environmental analysis for nonmechanized mineral exploration. The programmatic environmental analysis goes into further detail and evaluates a wider scope of resources than this checklist environmental assessment. This checklist environmental assessment should be read and understood in conjunction with the programmatic environmental analysis. The programmatic environmental assessment can be found on the Departments website at: [HYPERLINK](#)

II. PROJECT DEVELOPMENT

An explanation of the proposed project, application, and timeline of correspondence.

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED: <i>Provide a brief chronology of the scoping and ongoing involvement for this project.</i>
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3. ALTERNATIVES CONSIDERED:

Action Alternative: The proponent’s application would be granted, and the proponent would be allowed to conduct non-mechanized methods of mineral exploration for a time-period not to exceed five years.

No Action Alternative: The proponent’s application would be denied, and the proponent would not be allowed to conduct non-mechanized mineral exploration for a time-period not to exceed five years.

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 resources 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

- Will the project impact any unique geologic features?
- Yes - Further evaluation is required.
 - No – This project will not impact any unique geological features.

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

Consider substantial habitat values and use of the area by wildlife, birds, or fish. Identify cumulative effects to fish and wildlife.

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

- Is the exploration area contained within the boundaries of the DNRC Habitat Conservation Plan (HCP)?
- Yes - Further evaluation required
 - No – This project is not located within designated Greater Sage Grouse General, Core or Connectivity Habitat.

- Is the project area within Core or General Sage Grouse Habitat?
- Yes - Consultation is required through the MT Sage Grouse Habitat Conservation Program.
 - No – This project is not located within designated Greater Sage Grouse General, Core or Connectivity Habitat.

- Is the project area within one-half mile of an active Bald or Golden Eagle Nest?
- Yes - Further evaluation is required.
 - No – This project area is not within one-half mile of an active Bald or Golden Eagle Nest.

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.

- Are there other studies, plans, or projects currently in place on this tract?
- Yes – Add any of the following that are included on the trust land tract(s). Grazing Leases; Mineral Leases; Easements; other activity
 - No – There are no other studies, plans, or projects currently in place on this tract.

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.

- Are there any locally adopted environmental plans and goals for the tracts upon which non-mechanized mineral exploration is proposed?
- Yes - evaluate the impacts to these plans or goals that Mineral exploration would create.
 - No – There are no locally adopted environmental plans and goals

Checklist EA Prepared By:	Name:	Date:
	Title:	

V. FINDINGS

25. ALTERNATIVE SELECTED:

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

Checklist EA Approved By:	Name:
	Title:
Signature:	
Date:	

APPENDIX C: Public Comment

The Department received no public comment during the initial scoping period that ended June 15, 2026.