

CHECKLIST ENVIRONMENTAL ASSESSMENT

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|--------------------------------------|--|
| Project Name: | Right-of-Way for Buried Fiber Telecommunication Cables |
| Proposed Implementation Date: | July 2026 |
| Proponent: | Triangle Communications |
| Location: | S2SW4 Section 21, T27N R19E |
| County: | Blaine |
| Trust: | Common Schools |

I. TYPE AND PURPOSE OF ACTION

The proposed action is the authorization of a Right-of-Way for the installation, operation, and maintenance of underground fiber-optic infrastructure across state-owned land. The purpose of the action is to allow the applicant to construct telecommunications facilities necessary to provide and improve broadband service within the project area, while ensuring the use of state land is consistent with DNRC's trust responsibilities, existing land uses, and applicable management requirements.

II. PROJECT DEVELOPMENT

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

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

The Department of Natural Resources and Conservation (DNRC)
Northeastern Land Office (NELO) & Lewistown Unit Office
Proponent: Triangle Communications
Surface Lessees: AG#237 Cowan and Sons
Other: The Montana Sage Grouse Habitat Conservation Program

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

The DNRC has jurisdiction over the proposed project, which would be administered by the Northeastern Land Office (Lewistown Unit). The proponent is responsible for obtaining all necessary permits for the proposed project and for resolving any surface damage with the surface lessees.

3. ALTERNATIVES CONSIDERED:

Alternative A (No Action) – Under the No Action Alternative, the Department would not approve the requested Right-of-Way authorization, and the proposed installation of underground fiber-optic facilities across state-owned land would not occur. Existing land uses and management practices would continue unchanged.

Alternative B (the Proposed Action) – Under the Action Alternative, the Department would approve and issue a Right-of-Way authorization for the installation, operation, and maintenance of underground fiber-optic facilities across state-owned land, subject to applicable terms, conditions, and permitting requirements. The proponent would be responsible for obtaining all necessary permits and for addressing surface disturbance and reclamation in coordination with surface lessees.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

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

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

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

The project area is primarily composed of grazing land soils that have been managed for livestock use. No unusual geologic features, fragile soils, or unstable slopes are present within the proposed disturbance footprint. Construction activities, including trenching or plowing for buried fiber, could temporarily compact soils and disturb the surface layer. These effects would be localized and short-term.

Reclamation would include backfilling trenches, restoring soil profiles where practicable, and reseeding or returning disturbed areas to preexisting rangeland conditions. Standard construction practices would minimize erosion, compaction, and moisture loss, helping to maintain soil quality and stability.

Given the small scale of the disturbance and the existing grazing use of the land, cumulative impacts to soils within the surrounding landscape are expected to be minimal. No long-term or significant adverse effects to soil quality, stability, or moisture are anticipated.

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:

Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.

No perennial surface waters are located within the proposed disturbance footprint. Surface water in the surrounding area consists primarily of intermittent or ephemeral drainages associated with agricultural fields. Groundwater resources are present but at depths below typical construction activity.

Construction could result in short-term, localized increases in sediment or turbidity if excavation occurs near drainage features or during wet conditions. The use of best management practices, such as erosion control, minimizing disturbed areas, and immediate reclamation of trenches, would reduce potential impacts. Compliance with applicable water quality standards and avoidance of in-stream work would prevent violations of ambient water quality standards or drinking water at maximum contaminant levels.

Because the project would disturb a limited area within an already managed agricultural landscape, cumulative effects to water quality and quantity in the surrounding area are expected to be minimal. No long-term or significant adverse impacts to surface or groundwater resources are anticipated.

6. AIR QUALITY:

What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.

Short-term impacts to air quality would include minor dust and exhaust emissions from construction equipment. No long-term impacts on air quality are anticipated beyond short-term dust and exhaust emissions during construction. No significant cumulative impacts to air quality are anticipated.

7. VEGETATION COVER, QUANTITY AND QUALITY:

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

The project area consists primarily of rangeland and previously disturbed areas. Construction would temporarily remove or disturb vegetation along the ROW, including native grasses and forbs. Impacts would be localized and short-term, with vegetation expected to recover following reclamation and reseeding to preexisting rangeland conditions.

Temporary use of a backhoe may be permitted; if used, disturbed areas will be promptly reseeded to minimize the spread of invasive and noxious weeds. Weed management is required within sage-grouse habitat to maintain habitat quality.

Because the area has historically been managed for grazing, the action is not expected to result in significant changes to vegetation cover, quantity, or quality at the landscape scale. With proper reclamation and adherence to standard erosion control and weed management measures, cumulative effects to vegetative communities are anticipated to be minimal.

8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:

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

The project area consists of rangeland and previously disturbed areas managed for grazing. Construction activities may temporarily displace wildlife; these effects would be localized and reversible following reclamation and reseeding to preexisting rangeland conditions. No perennial waters are present within the disturbance footprint, so direct effects to fish or aquatic habitat are not anticipated.

The footprint occurs within general habitat for greater sage-grouse and black-footed ferret. To minimize impacts to these species and comply with Executive Order 12-2015:

- No fiber installation will occur between March 15 and July 15 within two miles of any active sage-grouse lek.
- Trenchless methods will be utilized where feasible to minimize surface disturbance.
- Temporary use of a backhoe may be permitted; disturbed areas will be promptly reseeded to reduce the spread of invasive and noxious weeds.
- Weed management measures are required within sage-grouse habitat to maintain habitat quality.
- Construction outside primary nesting periods for other sensitive birds will be implemented where practicable, and avoidance buffers will be established around sensitive habitats.

With these measures in place, construction impacts are expected to be minor, localized, and short-term. No significant direct, indirect, or cumulative impacts to terrestrial, avian, or aquatic habitats, including sage-grouse and black-footed ferret habitat, are anticipated.

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

Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

The project area contains portions of designated sage-grouse and black-footed ferret habitat. Other species of concern potentially occurring in or near the project area include the American bumble bee, golden eagle, and prairie shrew; a full list is provided in Appendix C. Construction activities could temporarily disturb wildlife through noise, vegetation removal, or soil disturbance; however, these effects would be localized and short-term, and habitat within the immediate disturbance footprint is limited to previously disturbed rangeland.

No wetlands are located within the disturbance footprint, and no direct impacts to aquatic habitat are anticipated. Specific mitigation measures include:

- No fiber installation between March 15 and July 15 within two miles of any active sage-grouse lek.
- Use of trenchless methods where feasible to minimize surface disturbance.
- Prompt reseeding of areas disturbed by backhoe use to prevent the spread of invasive and noxious weeds.
- Implementation of weed management measures within general sage-grouse habitat.
- Construction outside primary nesting periods for other sensitive birds where practicable, with avoidance buffers around sensitive habitats.

Given the small scale of disturbance, prior land use for grazing, and the proposed mitigation measures, no significant direct, indirect, or cumulative impacts to threatened, endangered, or sensitive species, including sage-grouse and black-footed ferrets, are expected.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

A Class I (literature review) level review was conducted by the DNRC staff archaeologist for the area of potential effect (APE). This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards. The Class I search results revealed that no cultural or paleontological resources have been identified in the APE.

Because the Areas of Potential Effect (APEs) are located within actively grazed and/or previously cultivated fields, there is a low likelihood for the presence of cultural or paleontological resources. Issuance of the proposed project easements will result in No Effect to antiquities as defined under the Montana State Antiquities Act. Therefore, no additional archaeological investigation is warranted.

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.

The project area consists primarily of grazing lands and is not located on prominent topographic features. The ROW and construction activities would be largely within the existing landscape and generally not visible from populated areas or designated scenic viewpoints.

Short-term visual changes could occur during construction, including the presence of equipment, trench lines, and temporary soil disturbance. Noise from construction machinery would be localized and temporary, limited to the work period, and would not extend beyond the immediate project area. No artificial lighting is proposed that would noticeably alter the visual character of the area.

Because of the limited scale of the project and the existing rangeland context, cumulative effects to aesthetics in the surrounding area are expected to be minimal. Long-term visual or auditory impacts are not anticipated once reclamation and revegetation are complete.

12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:

Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.

The proposed project would require limited use of environmental resources during construction, including fuel for equipment, water for dust control, and temporary disturbance of soil and land surface for trenching or plowing. Energy demands would be minimal and primarily associated with operation of construction machinery and temporary power use for equipment or splicing operations.

Because the project is confined to an existing rangeland landscape and does not involve high-demand industrial operations, it is not expected to significantly affect nearby activities or compete with other resource users. Standard construction practices, including erosion control, dust suppression, and prompt reclamation, would minimize temporary demands on soil, water, and air resources.

Cumulative effects on environmental resources are expected to be minimal, as the scale of the disturbance is small and the project occurs in an area already managed for grazing. No long-term or significant impacts to land, water, air, or energy resources are anticipated.

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.

Other environmental studies and planning documents relevant to the project area include rangeland management plans, previous DNRC Right-of-Way authorizations, and local county land use plans. The project area contains portions of designated sage-grouse and black-footed ferret habitat; no recently completed environmental impact assessments have been documented within the immediate project footprint.

Cumulative impacts in the analysis area may result from ongoing grazing management, infrastructure maintenance, and other authorized ROW projects. Future state actions under MEPA review or permitting within the analysis area are expected to be minor and localized, similar in scale to the current project. When combined with the proposed action, these activities are not anticipated to result in significant cumulative effects to environmental resources in the surrounding landscape.

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.

Short-term construction risks include slips, trips, falls, and equipment-related hazards. These risks will be minimized through compliance with OSHA standards, use of appropriate personal protective equipment, and standard safety practices. The completed underground fiber-optic facility will not pose a risk to public health or safety. No significant impacts to human health or safety are anticipated.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:

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

The project will not add to or deter from existing industrial, commercial, or agricultural activities in the area. No significant direct, indirect, or cumulative effects are anticipated.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:

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

The project will not create, relocate, or eliminate any jobs. No significant effects to the local or regional employment market are anticipated.

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:

Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

No changes to tax revenue are expected. No significant direct, indirect, or cumulative impacts are expected.

18. DEMAND FOR GOVERNMENT SERVICES:

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

The project will not increase traffic, school attendance, or need for additional fire or police services. No significant cumulative impacts are anticipated.

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.

No applicable zoning or management plans affect this project. No significant impacts are anticipated.

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

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

No recreational or wilderness areas will be affected. No significant impacts are anticipated.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:

Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing

The project does not involve housing or population changes. No significant impacts are anticipated.

22. SOCIAL STRUCTURES AND MORES:

Identify potential disruption of native or traditional lifestyles or communities.

No native, unique, or traditional communities are present; no significant impacts are anticipated.

23. CULTURAL UNIQUENESS AND DIVERSITY:

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

No unique cultural, historical, or aesthetic qualities will be affected. No significant impacts are anticipated.

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.

The project will result in a one-time \$1000.00 fee to Common Schools Trust. No significant cumulative economic or social impacts are anticipated.

V. FINDING

25. ALTERNATIVE SELECTED:

Alternative B (the Proposed Action) – The Department would approve and issue a Right-of-Way authorization for the installation, operation, and maintenance of underground fiber-optic facilities across state-owned land, subject to applicable terms, conditions, and permitting requirements. Existing land uses would continue, and reclamation measures would be implemented following construction.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

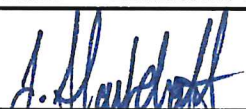
Based on the analysis of the proposed action and alternatives, potential impacts to environmental resources are expected to be minor, localized, and temporary. Short-term effects may occur during construction, including temporary soil disturbance, vegetation removal, dust generation, and noise from equipment. These effects would be mitigated through standard construction practices, reclamation, and revegetation measures.

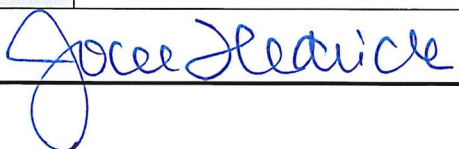
The disturbance footprint is limited to previously disturbed rangeland within sage-grouse and black-footed ferret habitat. Mitigation measures will minimize potential effects on these and other sensitive species. No perennial waters, unusual geologic features, or visually prominent landscapes would be affected. Air and water quality impacts would be minimal and short-term, and cumulative effects from existing or reasonably foreseeable activities in the area are expected to be negligible.

Given the limited scale of the project, the existing rangeland context of the site, and the mitigation measures proposed, the action is not expected to result in significant direct, indirect, or cumulative environmental impacts. Under the No Action Alternative, no environmental impacts would occur, and existing conditions would be maintained.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

☐ EIS ☐ More Detailed EA ☒ No Further Analysis

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| EA Checklist Prepared By: | Name: Josh Stoychoff |
| | Title: Lewistown Unit Manager |
| Signature: |  |
| | Date: 1/27/26 |

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| EA Checklist Approved By: | Name: Jocee Hedrick |
| | Title: Area Manager, Northeastern Land Office |
| Signature: |  |
| | Date: 1/27/26 |

Appendix A: Soil Ratings

| Table -- Shallow Excavations -- Summary by Rating Value | | | | |
|---|--------------|----------------|--|--|
| Summary by Rating Value | | | | |
| Rating | Acres in AOI | Percent of AOI | | |
| Somewhat limited | 314.5 | 90.7% | | |
| Very limited | 32.1 | 9.3% | | |
| Totals for Area of Interest | 346.6 | 100.0% | | |

| Table -- Soil Compaction Risk -- Summary by Rating Value | | | | |
|--|--------------|----------------|--|--|
| Summary by Rating Value | | | | |
| Rating | Acres in AOI | Percent of AOI | | |
| Medium | 346.6 | 100.0% | | |
| Totals for Area of Interest | 346.6 | 100.0% | | |

Appendix B: Reclamation Seed Mix

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

Appendix C: Species of Concern

Observed Species of Concern

| MT Status | Species Group | ELCODE | Common Name | Scientific Name | Habitat | Distribution | Global Rank | MT State Rank |
|-----------|---------------|-----------------------------|------------------------|---------------------------|----------------------|--------------------------|-------------|---------------|
| SOC | Fish | AFCJIB31020 | Northern Redbelly Dace | Chrosomus eos | Small prairie rivers | Resident Year Round | G5 | S2 |
| SOC | Birds | ABNLC12010 | Greater Sage-Grouse | Centrocercus urophasianus | Sagebrush | Resident Year Round | G3 | S2 |
| SOC | Birds | ABNKC19120 | Ferruginous Hawk | Buteo regalis | Sagebrush grassland | Migratory Summer Breeder | G4 | S3B |

Potential Species of Concern

| MT Stat | Species Group | ELCODE | Common Name | Scientific Name | Habitat | Distribution | Global Rank | MT State Rank |
|---------|-----------------|----------------------------|-------------------------------|-------------------------------------|--|--------------------------|-------------|---------------|
| SOC | Mammals | AMABA01030 | Preble's Shrew | Sorex preblei | Sagebrush grassland | Resident Year Round | G4 | S3 |
| SOC | Mammals | AMABA01230 | Merriam's Shrew | Sorex merriami | Sagebrush grassland | Resident Year Round | G4 | S3 |
| SOC | Birds | ABNIF02020 | Long-billed Curlew | Numenius americanus | Grasslands | Migratory Summer Breeder | G4 | S3B |
| SOC | Birds | ABPRV02050 | Sprague's Pipit | Anthus spraguei | Grasslands | Migratory Summer Breeder | G3G4 | S3B |
| SOC | Birds | ABPRV03010 | Thick-billed Longspur | Rhynchophanes mccownii | Grasslands | Migratory Summer Breeder | G4 | S3B |
| SOC | Vascular Plants | PMACP03350 | Crave's Sedge | Carex crawei | Wetland/Riparian | Present | G5 | S2S3 |
| SOC | Vascular Plants | PMHYD03010 | Long-sheath Waterweed | Elodea bifoliata | Wetland/Riparian (Shallow water) | Present | G4G5 | S27 |
| SOC | Birds | ABNIB03100 | Mountain Plover | Anarhynchus montanus | Grasslands | Migratory Summer Breeder | G3 | S2B |
| SOC | Vascular Plants | PQROS161E0 | Platte Cinquefoil | Potentilla platensis | Grasslands/Sagebrush (Mesic) | Present | G4 | S3 |
| SOC | Birds | ABPRV04040 | Brewer's Sparrow | Spizella breweri | Sagebrush | Migratory Summer Breeder | G5 | S3B |
| SOC | Birds | ABPRV04010 | Sage Thrasher | Oreoscoptes montanus | Sagebrush | Migratory Summer Breeder | G4 | S3B |
| SOC | Invertebrates | BHYM24280 | American Bumble Bee | Bombus pensylvanicus | Fields, farmland, grasslands | Resident Year Round | G3G4 | S3 |
| SOC | Vascular Plants | PQAST8H1S3 | Scribner's Ragwort | Senecio integerrimus var. scribneri | Sagebrush shrublands and grasslands, usually with clay soils | Present | G5T2T3 | S2S3 |
| SOC | Mammals | AMACC01010 | Little Brown Myotis | Myotis lucifugus | Generalist | Resident Year Round | G3G4 | S2S3 |
| SOC | Mammals | AMAFR06010 | Black-tailed Prairie Dog | Cynomys ludovicianus | Grasslands | Resident Year Round | G4 | S3 |
| SOC | Birds | ABPRV05010 | Baird's Sparrow | Centronyx bairdii | Grasslands | Migratory Summer Breeder | G4 | S3B |
| SOC | Birds | ABPRV05010 | Bobolink | Dolichonyx oryzivorus | Moist grasslands | Migratory Summer Breeder | G5 | S3B |
| SOC | Birds | ABUSB10010 | Burrowing Owl | Athene cunicularia | Grasslands | Migratory Summer Breeder | G4 | S3B |
| PSOC | Mammals | AMABA01230 | Prairie Shrew | Sorex haydeni | Grasslands | Resident Year Round | G5 | S3S4 |
| PSOC | Birds | ABUSB13040 | Short-eared Owl | Asio flammeus | Grasslands | Resident Year Round | G5 | S4 |
| SOC | Vascular Plants | PQCAV00040 | Slim-pod Venus'-looking-glass | Triodanis leptocarpa | Grasslands | Present | G5? | S3 |
| SOC | Birds | ABPRV05040 | Chestnut-collared Longspur | Calcarius ornatus | Grasslands | Migratory Summer Breeder | G5 | S2B |
| SOC | Vascular Plants | PQCAN00040 | Heart-leaved Buttercup | Ranunculus cardiophyllus | Grasslands (Moist, Montane) | Present | G5 | S3 |