

CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	3 Rivers Communications, Sheridan Fiber-to-the Home Project 2023
Proposed Implementation Date:	Spring -Summer 2023
Proponent:	3 Rivers Communications
Location:	T6S – R4W, Section 18 (Montana Tech Trust) T6S – R4W, Section 19 (Montana Tech Trust) T6S – R4W, Section 20 (Montana Tech Trust) T7S – R4W, Section 29 (Montana Tech Trust) T7S – R4W, Section 16 (Common Schools Trust)
County:	Madison

I. TYPE AND PURPOSE OF ACTION

3 Rivers Communications has applied to the MT DNRC, Dillon Unit to provide Fiber to the Home (FTTH) facilities that will cross 5 tracts of state land in the Dillon Unit in Madison County. The new (FTTH) facilities would provide telephony, high-speed data, and broadband services to the rural Sheridan area. Currently the rural Sheridan exchange is serviced by ageing copper cables that have reached their useful life limit, preventing 3 Rivers Telephone Coop from being able to fulfill service requests, including full deployment of DSL services. The proposed facilities will be buried fiber optic cables placed within existing cable corridors along state highway or county road rights-of-way both in public rights-of-way and utilizing some private easements.

Buried placement of new facilities will be accomplished using plowing, trenching and boring, where appropriate, and for the most part with the use of a vibratory plow drawn by a crawler tractor. The latter process involves insertion of the cable to a depth of 36" to 42" through a temporary surface opening of approximately 6"ins width. This opening is closed and repaired immediately behind the plow following insertion of the cable. All construction will be completed in accordance with RUS procedures and utilizing RUS plans and specifications.

The guide in these matters is the new Montana State Telecommunications Plan as mandated by Rural Utilities Service (RUS), an agency of the Department of Agriculture, and defined in Final Rule 7 CFR Part 1751 entitled, "Telecommunications Systems Planning and Design Criteria and Procedures."

Ground disturbance would be minimal, except for the placing of hand holes at points along the installation route to access the buried cable. Hand holes are a rectangular box approximately 20" tall by 25" wide by 32" long that the traditional phone pedestal sits on. They are buried flush to the ground and provide room under the pedestal to allow access to the fiber-optic cable for splicing or repairs.

The upgrade will allow for clearer communications and make available high-speed internet and digital television service to customers in the area.

The width of the combined easement over the 5 state tracts would be 20 feet wide, 10 feet each side of centerline and would encompass approximately 3.39 acres of state land. See attached maps.

3 Rivers Communications plans to start construction on this project in Spring of 2023 and complete the construction of the project by the fall of 2023.

PROJECT DEVELOPMENT

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

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

Scoping notices were sent to the following parties seeking comments for the proposed project:

Fish, Wildlife and Parks: Wildlife Biologists, Dean Waltee

All DNRC State Land lessees affected by this proposal were contacted by 3 Rivers Communications to sign settlement of damages forms.

Madison County Commissioners,
DNRC: Archaeologist, Patrick Rennie
Montana Natural Heritage Program

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

The Madison County Weed Board administers the state weed laws in Madison County.

3. ALTERNATIVES CONSIDERED:

Alternative A: Action Alternative Grant 3 Rivers Communications 5 utility Rights-of-way easements over state land sections for the installation of telecommunications cable. These easements would be granted for the specific purpose of installation and maintenance of an underground telecommunication cable and to upgrade current facilities and services.

Alternative B: No Action Alternative – Deny 3 Rivers Communications 5 utility rights-of-way easements over state land sections for the installation of fiber optic cable.

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 proposed underground telecommunication cable routes follow existing state, county, and private roads where disturbance has occurred in the past and the terrain is favorable. A vibratory plow drawn by a dozer will plow a temporary surface opening of approximately 6 inches in width. The opening would be closed immediately behind the plow to eliminate any berms. The line would be placed a minimum of 42 inches deep in the shoulder of existing roads. Disturbance would be minimal, except for placing hand holes at points along the road which would be placed within the existing ROW. Soils identified on the tract within the route of the project are of varying soil types. The scope of this project will cause very little disturbance of soils with little chance of erosion occurring from the proposal.

Action Alternative: Minor soil disturbance will occur under this alternative. No long term or cumulative effects to soils are anticipated.

No Action Alternative: No disturbance or impacts to soil resources would occur under this alternative.

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.

Action Alternative: The proposed action alternative will not impact any perennial or intermittent streams on DNRC lands. The nearest perennial stream is the Ruby River located approximately one mile to the east. The ground where the cable will be installed is flat along existing road corridors and no erosion or delivery of sediment to streams or wetlands would be anticipated. No impacts or cumulative effects to water quality would occur under the action alternative.

No Action Alternative: No impacts to water quality would occur under this alternative.

6. AIR QUALITY:

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

Action Alternative: During the installation phase of this proposal, a small increase in dust particulates will occur. This change in air quality standards would only be short term, and no long term or cumulative effects would be anticipated. The area currently meets EPA ambient air quality standards and is not located in a class I air shed. Any impacts from construction would be temporary and should not result in significant impacts to air quality. No long term or cumulative effects would be anticipated from this alternative.

No Action Alternative: No changes or impacts to air quality will occur under this alternative.

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.

Action Alternative: Some minor vegetative disturbance is expected under this alternative. The disturbance would occur during initial telecommunication cable installation activities that require tracked equipment driving along the proposed route to bury the cable. It is not expected that the disturbed areas will need to be re-seeded with grass seed due to the small amount of disturbance that will occur. Any noxious weed infestations caused by construction on state land will be the responsibility of the proponent to control. All weed plans will be submitted to the Madison County Weed Board for approval. If a large area of surface disturbance to vegetation does occur 3 Rivers Communications will need to revegetate this area by spreading grass seed on the disturbed area. A suitable grass seed mix will be prescribed to the proponent for any restoration work that is required.

No Action Alternative: No impacts to vegetative cover would occur under this alternative.

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.

Action Alternative: A variety of big game, small mammals, raptors, songbirds, may use these areas along the installation corridor. Installation of the underground telecommunication cable would be near other existing buried cables, overhead transmission lines and public road rights-of-way. Due to the relatively small disturbance area and brief installation period, minimal impacts are anticipated. The telecommunication cable will be buried. The amount of disturbance will be minimal. No long-term change in habitat will occur and no long term or cumulative effects to these species are anticipated under the action alternative.

No Action Alternative: No impacts to terrestrial, avian and aquatic life and habitats would occur if this alternative were chosen.

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 Montana Natural Resource Information Service (NRIS) was queried for information regarding sensitive or endangered species located near the project area. The query results are listed below:

Bald Eagles have been documented along the Ruby River which is located approximately one mile to the east of the proposed project area. No Bald Eagles have been documented within the proposed project area and the proposed project area likely occurs outside of any Bald Eagle nesting home range. No direct, indirect, or cumulative effects to Bald Eagles associated with this proposed project are anticipated. No other threatened or endangered species have been documented within the proposed project area.

A search of the Montana Natural Heritage Program found two vertebrate animal species of special concern, the western spotted skunk, and the Bobolink, in the vicinity of the proposed project area. Western spotted skunk is known to inhabit the area encompassing the proposed project area and Bobolinks have been observed approximately one-half mile to the north of the proposed project area. No significant impacts are expected. An additional inferred extent report of greater sage grouse and pigmy rabbit was also identified.

Greater sage grouse have not been documented in the quarter lati/long (L37D) that encompasses the proposed project area (Skaar 1996, MNHP 2003). No sage grouse leks are known to occur within the proposed project area. However, portions of sections 18, 19, & 29 T6S R4W are in general sage grouse habitat. Proponent applied to the Montana Sage Grouse Habitat Conservation Program for project approval. The project was approved with mitigation measures. The approval letter is made a part of this checklist EA.

No other sensitive species/species of special concern have been documented or observed within the proposed project area. No impacts are expected to occur to any endangered, threatened, or sensitive species.

Action Alternative: During the installation of the underground cable some of the species of concern could be disturbed. The project will be of short duration and a limited number of disturbed acres will occur. Under this alternative some short-term impacts may occur, but no long-term or cumulative effects are anticipated to any endangered, threatened, or sensitive species.

No Action Alternative: No impacts to terrestrial, avian and aquatic life and habitats would occur if this alternative were chosen.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

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

Action Alternative A Class III inventory was conducted of the area of potential effect (APE). A prospect pit an(24MA2866) and two historic irrigation ditches (24MA1722 and 24MA1752) are within the APE on State School Trust Land. The prospect pit will be avoided with cable installation work and the ditches will be restored to preconstruction conditions.

Proposed cable installation work will have *No Effect* to *Antiquities*. No additional archaeological investigative work will be conducted in response to this proposed development. A report of findings is on file with the DNRC and the Montana State Historic Preservation Officer.

No Action Alternative: No impacts to historical or archaeological sites would occur under this alternative.

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.

Action Alternative: The location of the proposed project is in sparsely populated areas and will not impact aesthetics significantly. The new cable will be buried underground and will not be visible once installed. Due to the relative remoteness of the project area and short duration of the cable installation period, aesthetics should not be adversely affected. No long term or cumulative effects to aesthetics are anticipated from this alternative.

No Action Alternative: No impacts to aesthetics will occur under this alternative.

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.

Action Alternative: No demands for additional environmental resources are required for this project. No short term, long term or cumulative effects on Environmental Resources should result from this proposed alternative.

No Action Alternative: No impacts on the demand for environmental resources of land, water, air, or energy will occur under this alternative.

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.

No other known environmental documents pertinent to the area are currently under consideration. The DNRC Administrative Rules for State Land Surface Management ARM 36.25.101 through 36.25.817.

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.

Action Alternative: This proposal could cause some safety concerns during the installation phase of the project. Additional traffic on rural roads and heavy equipment could increase the possibility of a traffic accident. Mitigation measures include requiring 3 Rivers Communications to provide signage or flagman during the plowing of the cable along the installation route.

No Action Alternative: No impacts to Health and Safety would occur under this alternative.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:

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

Action Alternative: No changes to agricultural activities would occur if this alternative were chosen.

No Action Alternative: No impacts on agricultural activities will occur under this alternative.

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.

Action Alternative: The proposal will not create nor eliminate permanent jobs in the area under this alternative.

No Action Alternative: No impacts to quantity and distribution of employment will occur.

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.

Action Alternative: This proposed alternative will not increase tax revenues or result in an increase or decrease of the tax base.

No Action Alternative: No impacts to the local or state tax base or tax revenue will occur.

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.

Action Alternative: The proposal will not increase demand for government services under this alternative.

No Action Alternative: No increase in demand for government services will occur under this alternative.

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.

Action Alternative: No known zoning laws or management plans are in place for any of the proposed locations under this alternative.

No Action Alternative: No impact to local government plans will occur under this alternative.

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.

Action Alternative: The proposed project would not affect recreational access. No impacts to recreational activities are anticipated under this alternative.

No Action Alternative: No impacts to access and quality of recreational and wilderness activities would occur if this alternative is chosen.

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.

Action Alternative: This alternative will not affect distribution of population or housing in the Lima or surrounding areas of Southwestern Montana.

No Action Alternative: No impacts to population would occur under this alternative.

22. SOCIAL STRUCTURES AND MORES:

Identify potential disruption of native or traditional lifestyles or communities.

Action Alternative: This proposed alternative will have no effect on social structures or mores of the surrounding area.

No Action Alternative: No impacts will occur.

23. CULTURAL UNIQUENESS AND DIVERSITY:

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

Action Alternative: This alternative will not affect cultural uniqueness and diversity of the area. The cable will be underground and will not be visible to the public.

No Action Alternative: No impacts will occur to cultural uniqueness and diversity under this alternative.

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.

Action Alternative: This alternative will provide state-of-the-art telecommunications capacity to the rural Twin Bridges residents, including high speed DSL internet coverage. It will also generate \$1,230.00 for the Deaf & Blind Trust, \$2,557.00 for the Common School Trust, and \$108.00 for the Western/Eastern Trust. The total amount generated under this alternative would be \$3,895.00.

No Action Alternative: Under this alternative the Twin Bridges area would not receive an upgrade in telecommunications coverage and no money would be generated for the three state land trusts.

EA Checklist Prepared By:	Name: Timothy Egan	Date: June 2, 2023
	Title: Dillon Unit Manager	

V. FINDING

25. ALTERNATIVE SELECTED:

Alternative A: Action Alternative Grant 3 Rivers Communications 5 utility Rights-of-way easements over state land sections for the installation of telecommunications cable. These easements would be granted for the specific purpose of installation and maintenance of an underground telecommunication cable and to upgrade current facilities and services.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

Significant impacts are not expected to occur because of the proposed activity. The telecommunication line will be installed along an existing road corridor and consequently the site has been previously disturbed. There will be temporary and short-term disturbance of vegetation during the installation process, but natural re-vegetation is expected to occur as it has in the past. Mitigation measures include the following.

1. Disturb as little ground as possible.
2. Treat any weeds in the area to be disturbed before and after disturbance.
3. Monitor and spray noxious weeds and invasive grasses if they occur.
4. Adhere to Montana Sage Grouse Habitat Conservation Program mitigation measures where applicable.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

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EIS

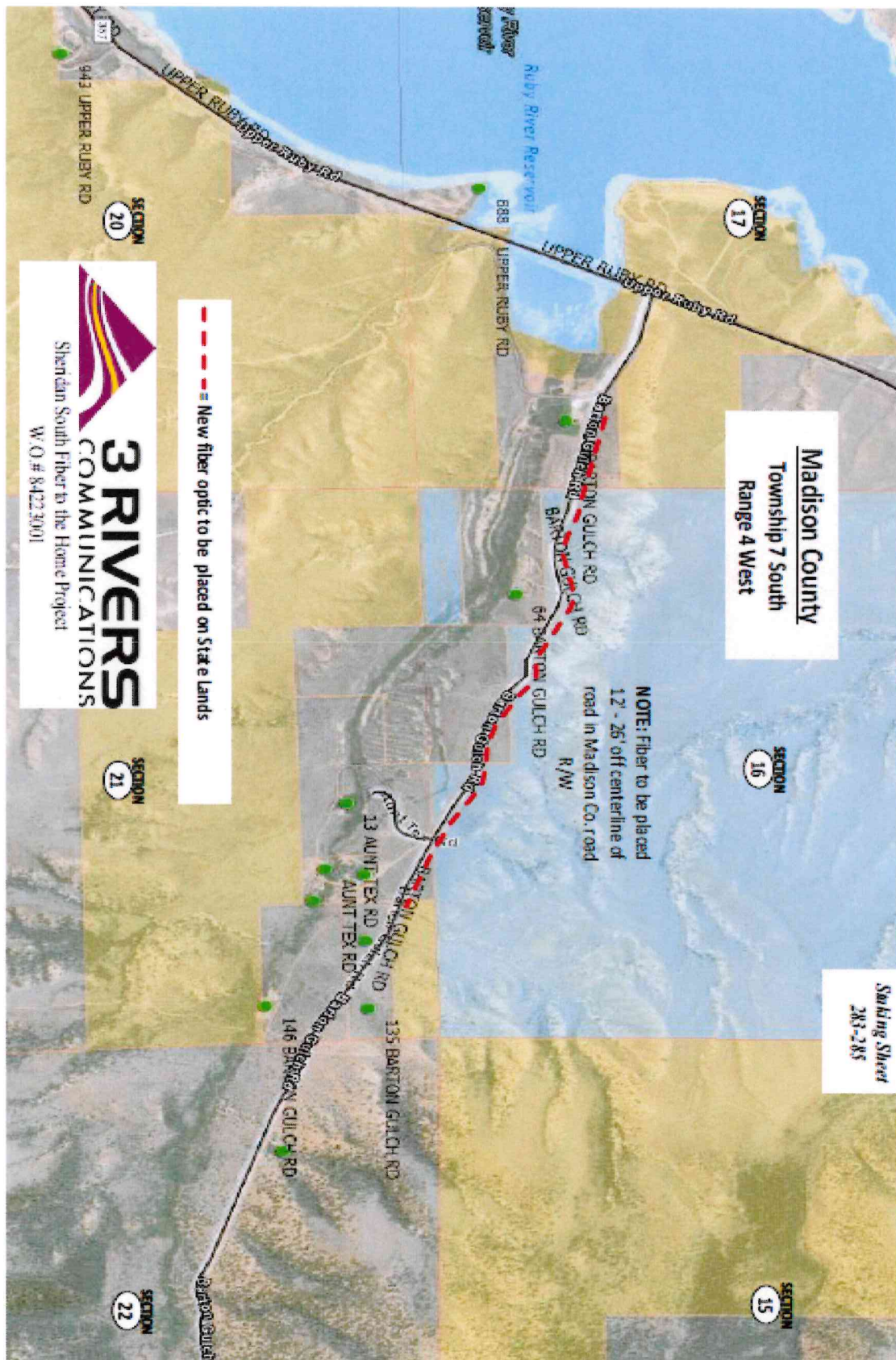
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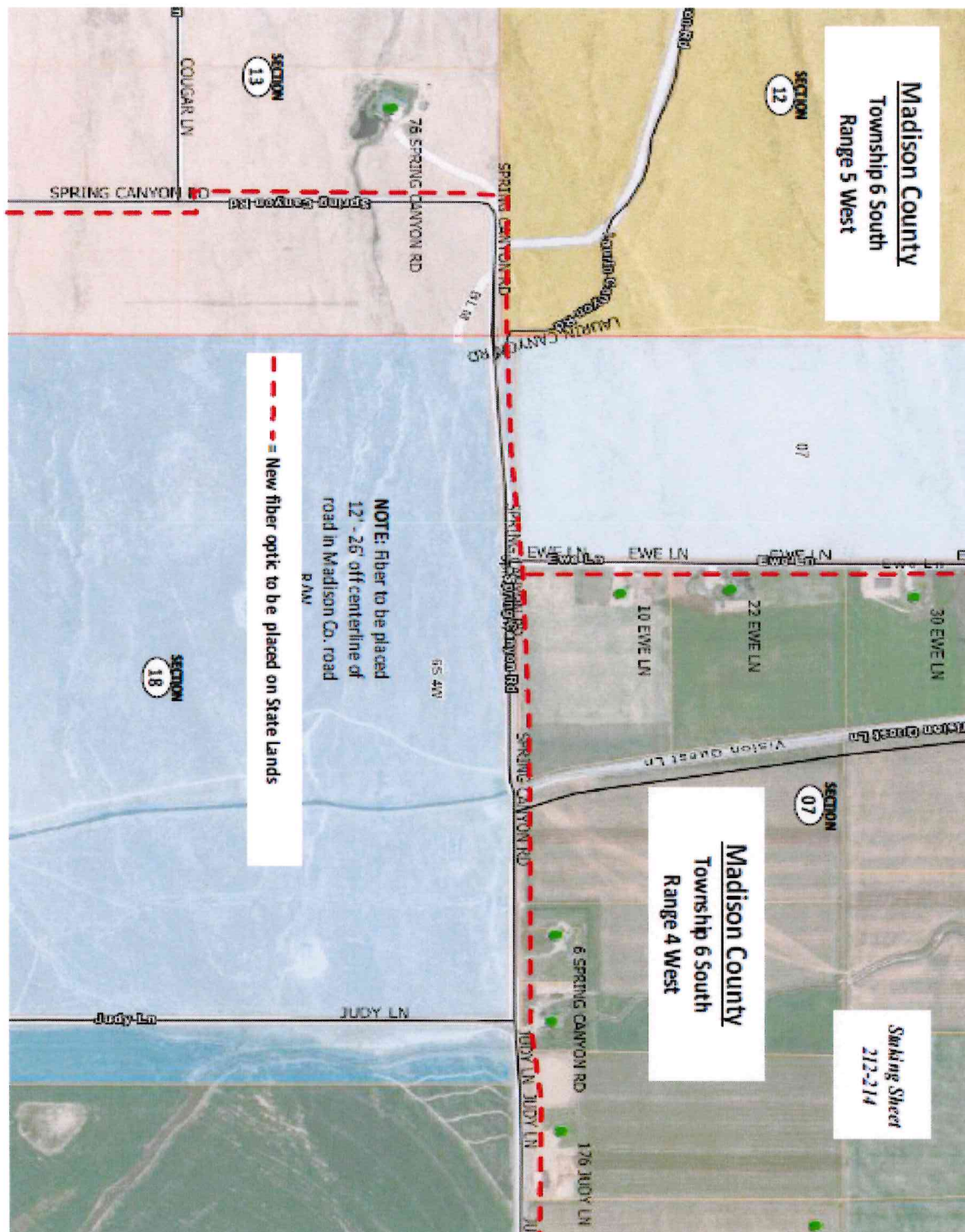
More Detailed EA

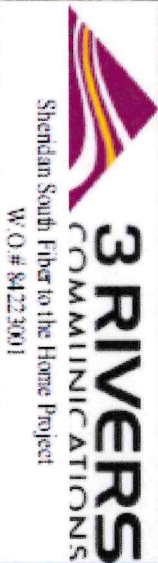
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No Further Analysis

EA Checklist Approved By:	Name: A Andy Burgoyne Title: CLO Trust Land Program Manager
Signature: 	Date: June 2, 2023







MONTANA SAGE GROUSE HABITAT CONSERVATION PROGRAM



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

STATE OF MONTANA

PHONE: (406) 444-0554
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PO BOX 201601
HELENA, MONTANA 59620-1601

Project No. 4996
Governor's Executive Orders 12-2015 and 21-2015
Sheridan South Fiber to the Home

Ron Dauwalder
3 Rivers Telephone Cooperative, Inc.
P.O. Box 429
Fairfield, MT 59436

November 29, 2022

Dear Mr. Dauwalder,

The Montana Sage Grouse Habitat Conservation Program received a request for consultation and review of your proposed activity on November 4, 2022. Additional information necessary for Program review was received on November 22, 2022. Based on the information provided, portions of this Project are located within a Core Area and General Habitat for sage grouse. The Bureau of Land Management (BLM) classifies portions of this area as either a Priority Habitat Management Area (PHMA) or a General Habitat Management Area (GHMA).

Executive Orders 12-2015 and 21-2015 set forth Montana's Sage Grouse Conservation Strategy. Montana's goal is to maintain viable sage grouse populations and conserve habitat so that Montana maintains flexibility to manage our own lands, our wildlife, and our economy and a listing under the federal Endangered Species Act is not warranted in the future. Similarly, the BLM has incorporated sage grouse conservation measures into their Resource Management Plans.

The Program has completed its review, including:

Project Description:

Project Type: Infrastructure – Communication

Project Disturbance: Total of 136.7 Miles of Buried Fiber Optic Cable

- 97.14 Miles within General Habitat
- 2.12 Miles within a Core Area
- 37.24 Miles Outside of Designated Habitat

Construction Dates: April 17, 2023 to December 1, 2023; Temporary (<1 Year)

Operation Duration: December 2, 2023, Permanent (> 25 Years)



Hosted by the Montana Department of Natural Resources and Conservation
Director's Office: (406) 444-2074



Project Location:

Legal: Township 5 South, Range 3 West, Sections 19, 20, 29, 30, 31
Township 5 South, Range 4 West, Sections 8, 17, 18, 19, 20, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
Township 5 South, Range 5 West, Sections 1, 9, 10, 11, 12, 13, 15, 22, 23, 24, 25, 26
Township 6 South, Range 3 West, Sections 31, 32, 33
Township 6 South, Range 4 West, Sections 4, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 36
Township 6 South, Range 5 West, Section 13
Township 7 South, Range 3 West, Section 5
Township 7 South, Range 4 West, Sections 4, 8, 9, 16, 17, 19, 20, 21, 22, 30, 31
Township 7 South, Range 5 West, Sections 25, 36
Township 8 South, Range 4 West, Sections 6, 7, 17, 18, 19, 20, 28, 29, 33, 34
Township 8 South, Range 5 West, Sections 12, 13, 23, 24, 26
Township 9 South, Range 3 West, Sections 7, 17, 18, 20, 21, 27, 28, 33, 34
Township 9 South, Range 4 West, Sections 1, 2, 3, 11, 12
Township 10 South, Range 3 West, Sections 3, 4, 9

County: Madison

Ownership: County Government, Montana Department of Transportation, State Trust Lands, Private, Bureau of Land Management, Forest Service

Project Description and Executive Orders 12-2015 and 21-2015 Consistency:

The Sheridan South Fiber to the Home Project proposes to install new fiber optic cable and replace existing copper cable in both a Core Area and General Habitat for sage grouse.

The 3 Rivers Telephone Cooperative Inc. proposes to install a total of 136.7 miles of buried fiber optic cable spanning approximately 33 miles, west of Virginia City, Montana. See Figure 1 (Sheridan South Fiber to the Home Project Location Map). Of the 136.7 miles of cable, 125.4 miles will be replacing existing cable and 11.3 miles of buried fiber optic cable will be installed where copper cable does not presently exist.

The 125.4 miles that will replace the existing copper cable with fiber optic cable will be placed adjacent to or directly on top of the existing copper line footprint. Therefore, they are considered an existing disturbance.

To implement this Project, 3 Rivers will utilize a static and/or vibratory plow drawn by a crawler tractor; this is considered a trenchless method. Directional Boring will be used to place the fiber optic cable under existing roads or stream beds.

The 11.3 miles of new fiber optic cable installation is comprised of 17 fiber optic segments. All but two segments are located along the MSGOT approved co-location zones of either: (1) 50 feet on either side of a local road or (2) 100 feet on either side of county roads.



Portions of the remaining two segments are not within any MSGOT approved co-location zone and appear to go cross country. However, both segments are located as such at the request of the private landowner and in both cases, will be installed within existing utility corridors. Therefore, these two sections were determined by the Program to meet the spirit of co-location.

Based on the information you provided, your project is 1.26 miles from the nearest sage grouse lek in a Core Area. Your Project is not within two miles of any active sage grouse lek in General Habitat. See Figure 2 (Sheridan South Fiber to the Home Project Lek Location Map).

The 3 Rivers Telephone Cooperative Inc. has voluntarily committed to adhere to the seasonal use stipulation set forth in Executive Order 12-2015 for segments within four miles of a sage grouse lek in a Core Area. Segments within this area will not be installed between March 15 and July 15. Therefore, activities associated with the Project are not expected to deviate from Executive Order 12-2015.

Density Disturbance Calculation Tool (DDCT) Analysis

Approximately 2.12 miles of the proposed Project is to occur in a designated Core Area for sage grouse. The Program has calculated the density and disturbance levels within the project area using the DDCT. The results were compared to allowable thresholds set forth in the Executive Order 12-2015. Your Project results are as follows.

DDCT Analysis Area Acres: 28,412.88
Total Preliminary Disturbance Acres: 2.57
Total Disturbed Acres in Analysis Area: 573.26
DDCT Result: 2.02%
New Disturbed Acres: 0.51
Affected Leks Within the DDCT Analysis Area: 1

Discussion:

On June 9, 2020, The Montana Sage Grouse Oversight Team (MSGOT) approved a modified policy approach to mitigation which may be applied to disturbance types that are buried using equipment that meets the definition and criteria of “trenchless methods” and that are not otherwise exempted from Executive Order 12-2015.

This modified approach applies only to buried disturbances that are implemented using machinery that meets a standardized definition. The precise design and configuration of trenchless equipment is expected to evolve over time. Currently, the key distinguishing features are a narrow vertical slot is opened up and filled back in during a single pass of machinery. Typical equipment names include: static plow, vibratory plow, or pull plow. Equipment that would not be considered a trenchless method include trenchers, back hoes, bull dozers, or scrapers.



Additionally, this modified approach is to be applied to buried disturbance types that meet the following criteria:

- machinery is equipped with a shank or vertical blade that penetrates the surface to bury cable, electric line or pipe as the shank is pulled forward; and
- machinery opens a slot in the ground about 6" wide, typically 3 -5' deep; and
- conduit, cable or pipe is fed into the ground, through a chute behind the blade as the slot opening is made; and
- soil is not scraped or removed; and
- vegetation and its root structure are not excavated, or removed; and
- ground disturbance is primarily associated with the vertical blade/shank; and
- vegetation may be crushed out to 12 feet by the equipment but is expected to grow back within one growing season.

In addition to meeting the standardized definition of trenchless methods, the project will also be analyzed to determine whether or not the buried features are co-located with existing surface disturbance associated with a road corridor or meets the spirit of being co-located. The co-location zone for trenchless method projects is defined according to the road size category (e.g. 100 feet for local roads, 200 feet for county roads, 240 feet for state highways and 260 feet for interstate highways).

Activities that meet both the standardized definition of "trenchless methods" and are determined to be co-located with existing surface disturbance are not subject to mitigation, but seasonal stipulations or other aspects of Executive Order 12-2015 may still apply.

Here, the new fiber optic cable will be installed using the direct plow method which creates a narrow opening in the soil, inserts the cable, covers the cable, and smooths the disturbed soil in a single pass. This method falls within the "trenchless method" standardized criteria. In addition, all cable segments were found to either be located within (1) the 100-foot co-location zone for local roads, (2) the 200-foot co-location zone for county roads, or (3) meet the spirit of co-location.

The modified trenchless approach allows for the temporary use of a backhoe during installation of fiber optic cables. The Program and MSGOT realize that trenchless machinery is incapable of cutting through some obstacles, which must be removed before the trenchless machinery can proceed. In these scenarios, the backhoe may be needed for a short distance and may be brought to the site of the obstacle to remove it.

The Density Disturbance Calculation Tool (DDCT) for the project is 2.02%. This does not exceed the disturbance threshold allowed under the surface disturbance stipulation in Executive Order 12-2015.

The Project is 1.26 miles from the nearest active sage grouse lek in a Core Area. The 3 Rivers Telephone Cooperative Inc. has voluntarily committed to adhere to the seasonal use stipulation set forth in Executive Order 12-2015 for segments within four miles of a sage grouse lek in a



Core Area. Segments within this area will not be installed between March 15 and July 15. Therefore, activities associated with the Project are not expected to deviate from Executive Order 12-2015.

The Program has determined that the Sheridan South Fiber to the Home Project meets the trenchless guidelines and will remain consistent with Executive Order 12-2015. Therefore, no compensatory mitigation is required.

Program Recommendations:

The State of Montana appreciates and welcomes the opportunity to collaborate with BLM to implement Executive Orders 12-2015 and 21-2015 and the BLM land use plans, respectively. We have a shared goal to conserve sage grouse and the habitats upon which they depend, consistent with the “all lands, all hands, all threats” approach.

The following stipulations are taken from Montana Executive Order 12-2015. These stipulations are designed to maintain existing levels of suitable sage grouse habitat by managing uses and activities in sage grouse habitat to ensure the maintenance of sage grouse abundance and distribution in Montana. Development should be designed and managed to maintain populations and sage grouse habitats.

- Under the modified trenchless approach, the temporary use of a backhoe may be permitted in conjunction with the directional bore method. The Program recommends that active reseeded and weed monitoring occur in these areas to prevent invasion and spread of weeds or non-native species in sage grouse nesting habitat.
- Reclamation should re-establish native grasses, forbs, and shrubs during interim and final reclamation. The goal of reclamation is to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to the benefit of sage grouse and replace or enhance sage grouse habitat to the degree that environmental conditions allow.
- Weed management is required within both a Core Area and General Habitat for sage grouse. Reclamation of disturbed areas must include control of noxious weeds and invasive plant species, including cheatgrass (*Bromus tectorum*) and Japanese brome (*Bromus japonicas*).

I encourage BLM to give full consideration to guidance within its own land use plans with respect to sage grouse and implement any special considerations or stipulations consistent with Montana Executive Order 12-2015 as appropriate.

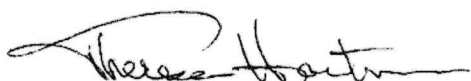
Your proposed project or activity may need to obtain additional permits or authorization from other Montana state agencies or possibly federal agencies. They are very likely to request a copy of this consultation letter, so please retain it for your records.



Please be aware that if the location or boundaries of your proposed project or activity change in the future, or if new activities are proposed within one of the designated sage grouse habitat areas, please visit <https://sagegrouse.mt.gov/> and submit the new information.

Thanks for your interest in sage grouse and your commitment to taking the steps necessary to ensure Montana's Sage Grouse Conservation Strategy is successful.

Sincerely,



Therese Hartman
Montana Sage Grouse Habitat Conservation Program Manager

Attachments:

Figure 1. Sheridan South Fiber to the Home Project Location Map

Figure 2. Sheridan South Fiber to the Home Project Lek Location Map



Figure 1

