Draft Environmental Assessment March 2013

A Proposal By

MONTANA FISH, WILDLIFE & PARKS

To Purchase an Interest in Wildlife Habitat North of Drummond in Powell County, Montana, To Be Known As The

MURRAY DOUGLAS, MURRAY CREEK, AND DOUGLAS CREEK CONSERVATION EASEMENTS

Montana Fish, Wildlife & Parks
Region 2
3201 Spurgin Rd., Missoula, MT 59804

INTRODUCTION

Montana Fish, Wildlife & Parks (FWP) invites the public to comment on its proposal to acquire an interest in 10, 760 acres of important fish and wildlife habitat in Powell County north of Drummond, MT. The Lands subject to this proposal are currently owned by The Nature Conservancy (TNC, which bought it from Plum Creek Timber Company in 2004 as part of the Blackfoot Challenge's 89,000-acre Blackfoot Community Project), the Blackfoot River Ranch, Inc., and the Manley Family Limited Partnership. FWP began pursuing funds to help conserve these properties in 2007. In 2010, FWP was awarded $2,900,000 by the US Forest Service's Forest Legacy Program to purchase these three conservation easements (Figure 1).

This proposal represents the proposed application of the Forest Legacy Program funds and additional donations by the landowners. All three private landowners have generously agreed to donate up to 25% of the conservation easements' 2013 appraised values to provide the required match for the federal grant funding. The Forest Legacy Program grant would then provide the remaining 75% of the conservation easements' appraised value. Although no FWP funding would be used to acquire interest in these properties, FWP would agree to hold and monitor these three distinct conservation easements in perpetuity.

The purpose of these conservation easements would be to conserve regionally important fish and wildlife habitat by preventing subdivision, development, and other forms of habitat loss; perpetuate the ranching and logging lifestyle of the private landowners who own the land under easement; and guarantee fall public hunting access to the properties. The lands under easement would remain in private ownership and on state and county tax rolls. Traditional uses of the land, including livestock production and timber management, could continue under terms of the easements. The easements would endure in perpetuity, and would be enforceable upon future owners of the properties.

PURPOSE AND NEED FOR THE PROPOSED ACTION

Authorities/Direction

FWP is authorized by State law (§ 87-1-209, MCA) to purchase land in fee title or conservation easements in order to protect fish and wildlife habitat. The Montana Fish, Wildlife and Parks Commission (the Commission) is the decision-making authority for matters concerning acquisition of conservation easements or other interests in land proposed by FWP. Through its Habitat Montana Policy (Administrative Rules of Montana, 12.9.508-512), the Commission has directed FWP to deliver the following services and benefits with its acquisitions of conservation easements and other interests in wildlife habitat: (a) conserve and enhance land, water and wildlife; (b) contribute to hunting and fishing opportunities; (c) provide incentives for habitat conservation on private land; (d) contribute to non-hunting recreation; (e) protect open space and scenic areas; (f) promote habitat-friendly agriculture; and (g) maintain the local tax base. Following Commission approval of a proposed project, the Montana Board of Land Commissioners (the Land Board) must approve land acquisitions, disposals or exchanges involving FWP proposals over 100 acres or $100,000 in value.

The proposed Murray Douglas Conservation Easements are made possible by a grant from the federal Forest Legacy Program, pursuant to Section 1217 of Title XII of the Food, Agriculture, Conservation and Trade Act of 1990 (16 USC Section 2103C). The Forest Legacy Program was created to protect environmentally important private forest lands threatened with conversion to non-forest uses. FWP is the agency that administers the Forest Legacy Program in Montana, in close cooperation with Montana's Forest Stewardship Committee.

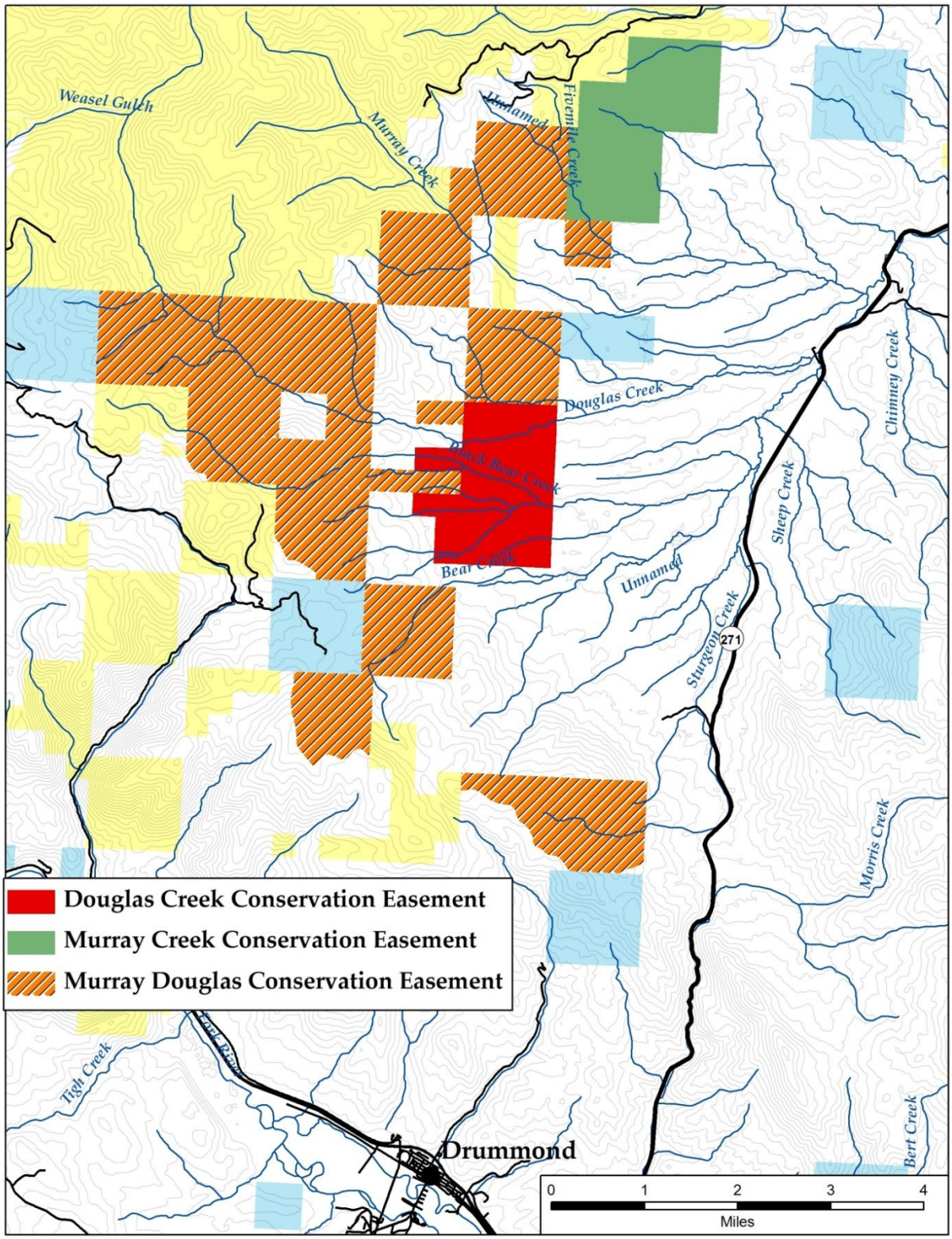

Figure 1. Location of the Project Area in Powell County. Landowners of parcels proposed for conservation easements (CEs): Douglas Creek CE = Manley Family Limited Partnership; Murray Creek CE = Blackfoot River Ranch, Inc.; Murray Douglas CE = The Nature Conservancy.

Project Need

This proposal represents an opportunity for FWP to conserve up to 10,760 acres of important wildlife habitat, working forest, range, and public recreational access in perpetuity. In addition, standards for grazing management would be extended to thousands of additional private acres associated with the conservation easements' associated grazing plans. This project would enact most of the land conservation strategy of the Blackfoot Challenge—with FWP as a partner—for the Murray Douglas area of the Blackfoot Community Project. The Blackfoot Challenge initiated the Blackfoot Community Project in Fall 2002—beginning with community meetings from Helmville to Seeley Lake—as a proactive response to the progressive parceling and development of Plum Creek timberlands across the watershed. As a result, The Nature Conservancy agreed to assume the financial risk of obtaining loans and purchasing up to 89,000 acres of Plum Creek property for the Blackfoot Challenge. TNC and Plum Creek closed on the first 42,000 acres of the Project in 2004, including lands subject to this proposal.

TNC's pivotal role in the Blackfoot Community Project—and as a partner in this proposed Forest Legacy project—is as the buyer and interim property holder, on behalf of the local communities. TNC relies in turn on its partners in the Blackfoot Challenge to develop and help implement a property disposition strategy by which permanent landowners may be found who will maintain the community values that were identified in the meetings of 2002, and thereafter. Among the community values at the top of the list are continued forest management, timber harvest, livestock grazing, noxious weed control, conservation of fish and wildlife habitat, and public recreational access. These values were provided for decades by the corporate timber companies, and were generally taken for granted by the neighbors and publics who benefited. This proposal reflects the disposition strategy of the Blackfoot Challenge for Plum Creek lands in the Murray Douglas project area as well as neighboring landowners' desire to conserve portions of their existing ranch lands. Most of the lands purchased and held by TNC as part of the Blackfoot Community Project have been protected and transferred to long-term public and private land stewards. Successful implementation of this proposal would nearly complete this monumental grassroots conservation initiative.

Public hunting access and continued active land management were specifically identified by the community and Blackfoot Challenge Disposition Working Group as priorities for the TNC land's disposition. TNC does not intend to retain any of its holdings in the Murray Douglas area long term but instead hopes to sell them, once protected by conservation easements, to adjacent private landowners.

Failure to act on this opportunity could make future success in conserving these lands more difficult as public funding becomes more difficult to secure and as the land passes to succeeding owners who may have different interests. The 2010 Forest Legacy Program grant was awarded to FWP with the understanding that all the lands identified in the application would be protected by application of the funds. Montana must either use the funds for their intended purpose or revert them; FWP cannot choose to only implement a significantly smaller portion of the proposal, nor can it use the awarded funds to conserve lands not identified in the 2010 application.

The Land's wildlife habitats, public access to them, and its continued working forest and range are clearly threatened. For example, a large and similar parcel directly adjacent to the project area has already been subdivided and developed for residential use (T12N R12W Section 30). The potential replacement of native vegetation with houses, fences, driveways, garages, barns, and other structures constitutes a direct habitat loss for native wildlife populations. Human activity associated with residential areas, including vehicle traffic and residents' pets, would displace many species from otherwise suitable habitat within an expanded radius around the homes. Conversely, the potential introduction of garbage,

bird feeders, fruit trees and other unnatural foods would likely attract deer, bears and mountain lions into nuisance situations that would not occur without rural residential development, and are difficult and expensive to mitigate or correct. Additionally, unencumbered private sale and development on the lands subject to this proposal would seriously decrease future hunting opportunities on those lands. As hunting is removed on more and more acres in a rural setting, there would be increasing potential for wildlife, particularly elk, to habituate and seek refuge in areas closed to hunting. Experience has shown that this can prevent FWP from effectively managing elk populations in balance with natural forage and from effectively controlling levels of private property damage caused by elk and other wildlife.

Area Description/Wildlife Resources

The proposed Murray Creek Conservation Easement parcels consist of approximately 1,450 acres within Murray and Fivemile Creeks. (See "Acreage Subject to Conservation Easement" in Appendix A, Draft Resource Management Plan.) These parcels are currently owned and managed for cattle production and timber by the Blackfoot River Ranch. The property is made up of variously stocked native forest rangeland, sagebrush grasslands, and riparian corridors.

The Douglas Creek Conservation Easement parcels consist of approximately 1,370 acres currently owned and managed by the Manley Family Limited Partnership. These parcels are a mix of open Douglas-fir and pine forest, native rangeland, hay meadows, and riparian corridors.

The Murray Douglas Conservation Easement parcels encompass approximately 7,940 acres in several distinct parcels ranging from Murray Creek in the north to Sturgeon Mountain in the south. These former industrial forest lands (now owned by TNC) are primarily sparsely stocked regenerating Douglas-fir and pine forests, with native grass understories intermixed with aspen stands and riparian vegetation near streams.

The lands lie within a matrix of Montana Department of Natural Resources and Conservation (DNRC), Bureau of Land Management (BLM), and private forest and ranch land in the eastern Garnet Range. The forest understory vegetation includes common snowberry, pinegrass, elk sedge, heartleaf arnica, white spirea, kinnikinnick, Oregon grape, serviceberry, and twinflower. Common forest habitat types are Douglas-fir/snowberry, Douglas-fir/twinflower, and Douglas-fir/ pine grass.

Timber harvest has significantly decreased the abundance of large-diameter ponderosa pine and Douglas-fir, especially on the Murray Douglas Conservation Easement area. Current forest stands generally include relatively open overstories of Douglas-fir with understories of sapling, seedling and pole-sized Douglas-fir on moist aspects and grass on drier aspects. Ponderosa pine and lodgepole pine regeneration is present but not abundant in most areas. Bluebunch wheatgrass, rough fescue, arrowleaf balsamroot and Idaho fescue are present on dry aspects and in forest openings. Fire suppression over the last 80 years has likely reduced the overall grassland acreage. Riparian corridors occur along perennial steams. Riparian vegetation is primarily alder and sedge, with lesser amounts of willow and cottonwood. No Montana State listed Plant Species of Concern are known to occur on the properties.

Several species of noxious weeds occur throughout the properties at various levels of infestation. Weeds are most prevalent along roadsides and on drier aspects with grassy understories and sparse forest canopy cover. The most prevalent weed species include cheatgrass, spotted knapweed, hound's tongue, and thistles. The private landowners involved in these proposed easements annually invest significant time and resources in weed treatment efforts.

The project area provides important summer and fall/transitional range for the East Garnets elk herd (numbering approximately 750 animals), hundreds of mule deer, white-tailed deer, and moose. Elk, mule deer, and moose use portions of the property during winter at times and during years when snowpack is less limiting. A portion of the East Garnet elk herd annually migrates out of the Helmville Valley to winter on the open faces between Bearmouth and Drummond. The subject lands lie within this migratory corridor. The area is popular with big game hunters throughout the open fall seasons.

The project area provides important habitat and hunting opportunity for other big game species including moose, black bear, wolf, and mountain lion. Bobcat, pine marten, mountain grouse, raptors, and dozens of passerine bird species are also common.

The project area does not include high quality Canada lynx habitat nor would production of lynx habitat be a reasonable management objective. That said, one of the southernmost, naturally occurring populations of Canada lynx in the American west occurs directly adjacent to project lands (in the higher elevation areas of the Garnet mountains) and the project area contributes to the function of a putative north/south movement and dispersal corridor.

Grizzly bear presence on and around the subject property has increased in recent years as the extent of the bear's range continues to expand south. Today, grizzly sightings on or near the properties are common.

Douglas Creek supports a native resident westslope cutthroat trout population. Both Douglas Creek and Black Bear Creek contribute to the overall health and function of the Blackfoot River by affecting sediment load and water temperature. Both creeks are significantly dewatered downstream of the subject property. FWP has ranked both creeks as being moderate restoration priorities.

DESCRIPTION OF THE PROPOSED ACTION

FWP proposes to purchase and hold three distinct conservation easements, totaling 10, 760 acres, from willing private sellers using Forest Legacy Program grant funds and private donations. The Forest Legacy Program would provide 75% of the respective conservation easements' appraised 2013 value. The private landowners will donate the remaining 25% of the easements' value in order to satisfy the Forest Legacy Program's matching fund requirement.

If this proposal is approved, FWP would purchase the Conservation Easements by the summer of 2013. All parties anticipate immediate subsequent sale of portions of the encumbered TNC land to neighboring landowners.

Management of all lands under conservation easement would be at the sole discretion of the several landowners provided that such actions comply and be consistent with the agreed terms of the Conservation Easements. In general the Conservation Easements would restrict or guide several significant land management activities, as follows:

<u>Subdivision and Development</u>. The landowner s may not construct permanent structures on the Land without prior approval from FWP. The land may not be subdivided, except as specifically provided for in the easements. The sellers and FWP have anticipated several sales of TNC lands to neighboring landowners; these and several additional land divisions have been specifically allowed for in the Easements. Any transfers of land to a public agency would not count as a subdivision for the purposes of

the Conservation Easement. Utility and energy generation improvements, habitat improvement activities, and road building may occur with the Prior approval of FWP.

Forest Management. Forest Stewardship Plans have been prepared for the properties proposed for conservation easement purchase. These Plans are intended to both provide a description of forest stand types on the property and a range of appropriate management prescriptions for those forest resources. The landowners retain the right, and are in fact encouraged, to actively manage forested habitat on the property consistent with the Conservation Easements' stated conservation values and the Forest Stewardship Plans. Any management activity that produces material to be sold or otherwise transferred off the property requires prior FWP notice and approval to ensure compliance with the Easement and Forest Stewardship Plan. The landowner or agent will prepare a Forest Management Plan describing the anticipated activity for FWP review and approval. Parties anticipate updating the Forest Stewardship Plan periodically and in collaboration with the landowner to account for forest succession and other significant changes to existing forest stand condition and resource need.

Grazing Management. The landowner may graze livestock on the property after developing and while following a FWP-approved Grazing Management Plan. The intent of the Grazing Plan is to ensure the long-term maintenance and improvement of livestock forage, native wildlife habitat, and riparian vegetation condition. Grazing management plans are intended to be flexible so that they can be collaboratively modified over time. FWP and the landowners have already agreed on grazing plans that will guide grazing management once the transactions are complete.

Public Recreational Access. The Conservation Easements require that the landowners provide recreational hunting access during the FWP-approved fall hunting season. The Conservation Easement does *not* require the landowner to grant access by any but non-motorized, non-mechanical means. Specific details of hunter access management may vary by landowner but the landowner(s) must generally allow public hunters to enter the Land via designated parking areas, adjacent public lands, or publically accessible roads. The landowners may choose to allow individuals additional motorized access to the properties and may deny access to anyone who is not conducting, or has in the past not conducted, themselves in a prudent, responsible, and safe manner.

FWP will work with landowners to develop a Recreation Access Plan to help manage public use of the properties. These Plans may direct the designation of parking areas, signage, road closure structures, etc. FWP will contribute material and manpower toward the development and implementation of these Access Plans.

Other Restricted Activities. The landowners may not, without prior approval or as otherwise provided for in the Conservation Easements: Significantly manipulate native vegetation; transfer, sell, or lease water rights; degrade wetland or riparian areas; conduct exploratory or extractive surface mining; operate a feed lot; install utilities; construct permanent structures; introduce non-native plants; operate an alternative livestock ranch, fur farm, shooting preserve, zoo, or other facility that holds or propagates native or non-native animals; rent or lease the land for recreational purpose (including outfitting) or charge trespass fees; or use the land for commercial or industrial use apart from forest management and livestock grazing.

Noxious Weed Management. The Forest Stewardship Plans provide basic information on the distribution and treatment of weeds on the property. The individual landowners are responsible for control of noxious weeds on their land.

ALTERNATIVES TO THE PROPOSED ACTION

Alternative A—No Action

FWP considered the alternative of taking no action. This would leave a full range of future management options for the subject lands, including development options, in the hands of current and future owners of the properties. FWP would retain the option to comment on subdivision and development proposals under existing laws and policies in Powell County; however, the effects of FWP's input on any future proposed subdivision are uncertain. Public access for hunting on the Land would remain at the discretion of current and future landowners. FWP would revert the $2,900,000 2010 Forest Legacy Program grant; these granted funds cannot be obligated to any project or use except for that described in the successful application.

IMPACTS

Neither the Proposed Action nor Alternative A would have any effect on the following concerns:

Solid/hazardous wastes	Water rights
Wild and scenic rivers	Floodplains

Wildlife Populations and Use Currently Associated with the Property

Threatened and Endangered Species: Grizzly bears, a Threatened Species under the federal Endangered Species Act, are increasingly common on the subject property. Under the Proposed Action, the land would be expressly managed for wildlife benefit. Residential subdivision and its concomitant food attractants (which inevitably lead to human conflicts and lethal removal of grizzlies) would be prohibited. Canada lynx (Threatened) are not known to use the subject lands nor is high quality habitat for the species present or possible there. The project area does lie near important lynx habitat in high elevation areas of the Garnet Mountains and lies within a putative corridor lynx, which other species could use to disperse from the Garnets to areas south and east. Bull trout (Threatened) do not occur on project lands. FWP expects improved grazing and timber management practices following implementation of conservation easement terms will benefit downstream populations of bull trout and other native fish.

In all cases, the proposed action would be expected to benefit threatened and endangered wildlife in the long run by maintaining native plant communities and preventing residential or other land development. The Proposed Action would not allow or introduce any land use or activity that would be detrimental to these species.

No other federally listed threatened or endangered species are known or expected to occur on or within the affected area of the proposed action.

Montana's Species of Concern (SOC)[1]: The proposed action offers protection from habitat loss for SOC and other native plant and animal species collectively, while the No-Action alternative does not.

[1] A native animal breeding in Montana that is considered to be "at risk" due to declining population trends, threats to its habitats, and/or restricted distribution. The purpose of Montana's SOC listing is to highlight species in decline and encourage conservation efforts to reverse population declines and prevent the need for future listing as Threatened or Endangered Species under the Federal Endangered Species Act.

Big Game Species: The proposed action would maintain existing land uses and prevent changes in land use that would affect wildlife populations. Alternative A (No Action) would leave an important big game habitat vulnerable to the management decisions of future private landowners who might not consider objectives that feature wildlife or the general public interest in wildlife. Changes in management direction, such as subdivision and sale of residential lots for development, would negatively impact native wildlife through direct removal of natural habitat on homesites, along roadways, and elsewhere within the daily use area of people and pets. Indirect effects include disturbance of wildlife across a wider area around homes due to an increase in human recreational activity. Wildlife species diversity would be expected to decline as species associated with human residential areas increase and species sensitive to disturbance are displaced. Elk and deer would likely be displaced onto adjacent private lands increasing the currently high level of game damage on private property and costs to FWP of addressing these issues. The introduction of dog food, garbage, bird feeders, pets and other attractants in this presently remote habitat would probably attract black bears, mountain lions and grizzly bears to residences, ultimately increasing mortality in these species as they become viewed as pests. The proposed action would prevent these and other forms of wildlife habitat loss on the subject lands.

The proposed action would ensure perpetual fall public hunting access to the Conservation Easement lands. Alternative A (No-Action) would allow a future landowner(s) to close the land to public hunting, which would result in a loss of valued access to remote natural habitat. It might also lead to a reduced opportunity for effective elk harvest, which would exacerbate current game damage problems on private lands in the Helmville area.

Potential Value of the Land for Protection, Preservation and Propagation of Wildlife

The proposed action would serve to maintain future management options for protecting, preserving and propagating wildlife by perpetually preserving the natural habitats required at the landscape scale to support wildlife populations and communities, and by prohibiting competing land uses and developments that would diminish habitat quality. Alternative A (No Action) would allow the possibility of future land subdivisions, developments and substantial changes in land use and habitat quality that would severely limit and diminish options for protecting and managing wildlife populations for the public benefit.

Management Goals Proposed for the Land and Wildlife Populations, and Any Additional Uses of the Land Such as Livestock Grazing or Timber Harvest

Management goals and strategies for the Conservation Easements, including wildlife populations, timber harvest, livestock grazing, and noxious weeds are detailed in the conservation easements and draft Management Plan. Forest management and livestock grazing would be conducted in accordance with FWP-approved Forest Stewardship Plans, Forest Management Plans (project level), and Grazing Management Plans.

Potential Impacts to Adjacent Private Land Resulting from the Proposed Action

The Proposed Action may directly benefit several adjacent landowners by allowing them to purchase lands encumbered by Conservation Easements at a significant discount (because these lands can no longer be used for subdivision/residential development), thus blocking up their current ownership and expanding the capacity of their current operations. The Proposed Action could influence other landowners bordering the Conservation Easement via long-term impacts on property values. Property values on lands bordering the conservation easements may increase because the easement lands will remain dominated by open space. Otherwise, the general effects of this proposal on neighboring property would be status quo. FWP would continue to attempt to control elk population size (by hunting) to match

available habitat and minimize damage to private crops and fences. The No-Action alternative would allow the possibility of dramatic changes in land use on the subject property in the future, which could change the character of the local community.

Potential Social and Economic Impacts to Affected Local Governments and the State

A draft socio-economic assessment is included with this Environmental Assessment (Appendix B). The Proposed Action would not immediately affect the County or State tax base. Over the long run, Alternative A (No Action) would allow greater potential residential and commercial growth in this rural area. This possible future growth would be accompanied by higher demand for utilities, roads, schools and other services that would have to be partially or wholly provided by state and local governments. As developments achieved their potential growth limits under Alternative A, the recreational and economic benefits generated by the existence of abundant and diverse wildlife and natural landscapes in the local area would be diminished. Conversely, the Proposed Action would restrict future residential and commercial developments on the subject lands, in a location that would allow wildlife to continue to flourish, and in a rural setting where wildlife populations may be managed effectively.

Land Maintenance Program to Control Weeds and Maintain Roads and Fences

Under the proposed action, the land under Conservation Easements would remain in private ownership; responsibility for weed management and road maintenance would lie with the landowners. The Forest Stewardship Plan provides the landowners clear noxious weed control and road maintenance guidance; both weed management and roads would be specifically addressed in approved Forest Management Plans.

Air and Water Quality

The proposed action would likely result in a net reduction in potential future risks to air and water quality on the subject lands, compared to No Action. Possibilities for residential, commercial, and industrial developments would be reduced and restricted across the subject land. Such developments, which would remain a possibility under the No-Action alternative, would have the potential for affecting air and water quality in numerous ways. For example, increased roading and traffic on roads to service housing or commercial developments could increase runoff from road surfaces into Blackfoot River tributaries. Timber harvest activities on Conservation Easements would be conducted under FWP supervision so that water quality would be protected.

Wetlands and Riparian Habitats

Under the proposed action, riparian habitat would be included among the conservation values of the land to be protected from further damage. Implementation of FWP Grazing Management Plans would be expected to improve streambank and riparian vegetation conditions in the long run. The No-Action alternative offers no protection for riparian areas on the proposed project area.

Livestock grazing

Livestock grazing on the Conservation Easements would be subject to a FWP-approved and monitored Grazing Management Plan. Plans would be guided by FWP Standards for Livestock Grazing; FWP expects native vegetation condition to significantly improve following implementation of the proposed conservation easements. Livestock grazing would be unrestricted under the No-Action alternative.

Historic and Cultural Resources

The proposed action would not cause a change in land use, so would not affect cultural sites. Potential developments allowable under the No-Action alternative would leave cultural resources at risk.

Cumulative Impacts

Alternative A (No Action) could ultimately contribute to the cumulative regional and local loss of wildlife habitat and public access if the subject lands are eventually managed in a manner incompatible with these values. Further, no-action could ultimately contribute slightly to the cumulative regional and local loss of grazing land for the livestock industry, and an increasing cumulative demand for services provided by local county and state governments to new residences and residential properties. The proposed action would benefit adjacent public and private landowners by ensuring that management of the Conservation Easements is generally consistent with current private, TNC, DNRC, and BLM land and public- access management.

PUBLIC INVOLVEMENT

Formal public review of the draft environmental assessment (EA) for the proposed Murray Douglas, Murray Creek, and Douglas Creek Conservation Easements, including a draft socio-economic assessment (Appendix B) and Draft Resource Management Plan (Appendix A), will begin with the availability of these documents on March 22, 2013 and will close at 5:00 p.m. April 22, 2013. The availability of this EA for public review will be advertised in the local, Missoula-area, and statewide media, and a copy of the draft EA will be mailed to adjacent landowners and all parties who indicate an interest in this proposal. A public hearing will be held at the Drummond Community Center on April 3, 2013 at 6:00 P.M. FWP has also presented the proposal to the Powell County Planning Board. After reviewing public input received on or before April 22, 2013, FWP will decide upon a preferred alternative. The Fish, Wildlife and Parks Commission will be asked to render a final decision on this proposal at its regularly scheduled meeting in Helena on May 9, 2013. The project will be submitted to the State Board of Land Commissioners for final consideration at its first monthly meeting following an approval by the Fish, Wildlife & Parks Commission.

Comments should be addressed to Sharon Rose; Montana Fish, Wildlife & Parks; 3201 Spurgin Road; Missoula, MT 59804 (phone 406-542-5540; email *shrose@mt.gov*). Comments must be received by FWP no later than 5:00 pm on April 22 to ensure their consideration in the decision-making process.

AGENCIES, GROUPS OR OTHERS CONSULTED IN PREPARATION OF THE EA

Montana Fish, Wildlife & Parks
- Hugh Zackheim, Land Section Supervisor
- Candace Durran, Land Agent, Helena
- Rebecca Jakes-Dockter, Legal Counsel, Helena
- Rick Northrup, Habitat Bureau Chief, Wildlife Division, Helena
- Kelvin Johnson, Range Coordinator, Glasgow
- Ken McDonald, Wildlife Division Administrator, Helena
- Ron Pierce, Fisheries Biologist, Missoula
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The Nature Conservancy
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PERSONS RESPONSIBLE FOR PREPARING THE EA

Montana Fish, Wildlife & Parks, Region 2

Jay Kolbe, Wildlife Biologist, Seeley Lake

NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT

Based on an evaluation of impacts to the physical and human environment, under the Montana Environmental Policy Act (MEPA), the proposed action is not a significant action affecting the human environment; therefore, an environmental impact statement is not a necessary level of review.