

DRAFT

ENVIRONMENTAL ASSESSMENT

CHECKLIST

**Vandalia WMA Management Agreement and
Associated Management Actions
(FWP-CEA-WLD-R6-24-009)**

11-14-2024



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Checklist Environmental Assessment

The Montana Department of Fish, Wildlife and Parks (FWP) has prepared this Draft Environmental Assessment (EA) in accordance with the requirements of the Montana Environmental Policy Act (MEPA). The purpose of an EA is to identify, analyze, and disclose the impacts of a proposed state action. This document may disclose impacts that have no required mitigation measures, or over which FWP, more broadly, has no regulatory authority.

Local governments and other state agencies may have authority over different resources and activities under separate regulations. FWP actions will only be approved if the proposed action complies with all applicable regulations. FWP has a separate obligation to comply with any federal, state, or local laws and to obtain any other permits, licenses, or approvals required for any part of the proposed action.

I. Compliance with the Montana Environmental Policy Act

Before a proposed project may be approved, environmental review must be conducted to identify and consider potential impacts of the proposed project on the human and physical environment affected by the project. The Montana Environmental Policy Act (MEPA) and its implementing rules and regulations require different levels of environmental review, depending on the proposed project, significance of potential impacts, and the review timeline. § 75-1-201, Montana Code Annotated (“MCA”), and the Administrative Rules of Montana (“ARM”) 12.2.430, General Requirements of the Environmental Review Process.

FWP must prepare an EA when:

- *It is considering a “state-proposed project,” which is defined in § 75-1-220(8)(a) as:
 - (i) a project, program, or activity initiated and directly undertaken by a state agency;
 - (ii) ... a project or activity supported through a contract, grant, subsidy, loan, or other form of funding assistance from a state agency, either singly or in combination with one or more other state agencies; or
 - (iii) ... a project or activity authorized by a state agency acting in a land management capacity for a lease, easement, license, or other authorization to act.*
- *It is not clear without preparation of an EA whether the proposed project is a major one significantly affecting the quality of the human environment. ARM 12.2.430(3)(a));*
- *FWP has not otherwise implemented the interdisciplinary analysis and public review purposes listed in ARM 12.2.430(2) (a) and (d) through a similar planning and decision-making process (ARM 12.2.430(3)(b));*
- *Statutory requirements do not allow sufficient time for the FWP to prepare an EIS (ARM 12.2.430(3)(c));*
- *The project is not specifically excluded from MEPA review according to § 75-1-220(8)(b) or ARM 12.2.430(5); or*
- *As an alternative to preparing an EIS, prepare an EA whenever the project is one that might normally require an EIS, but effects which might otherwise be deemed significant appear to be mitigable below the level of significance through design, or enforceable controls or stipulations or both imposed by the agency or other government agencies. For an EA to suffice in this instance, the agency must determine that all the impacts of the proposed project have been accurately identified, that they will be mitigated below the level of significance, and that no significant impact is likely to occur. The agency may not consider compensation for purposes of determining that impacts have been mitigated below the level of significance (ARM 12.2.430(4)).*

MEPA is procedural; its intent is to ensure that impacts to the environment associated with a proposed project are fully considered and the public is informed of potential impacts resulting from the project.

II. Background and Description of Proposed Project

Name of Project: Vandalia WMA Management Agreement and Associated Management Actions

The Vandalia Wildlife Management Area (WMA) encompasses approximately 387 acres of U.S. Bureau of Reclamation (BOR) lands under Montana Fish Wildlife and Parks (FWP) management from 1994-2024. These lands were originally set aside and managed as a WMA for the purpose of mitigation as set forth in the “Report on Proposed Rehabilitation and Betterment Program, Glasgow Division, Milk River Project, July 1989”. A 30-year Memorandum of Understanding (MOU) between the BOR, Glasgow Irrigation District (GID), and FWP, granted FWP the management authority over the public recreation, wildlife, and other resource values associated with this land. This MOU expired in June 2024.

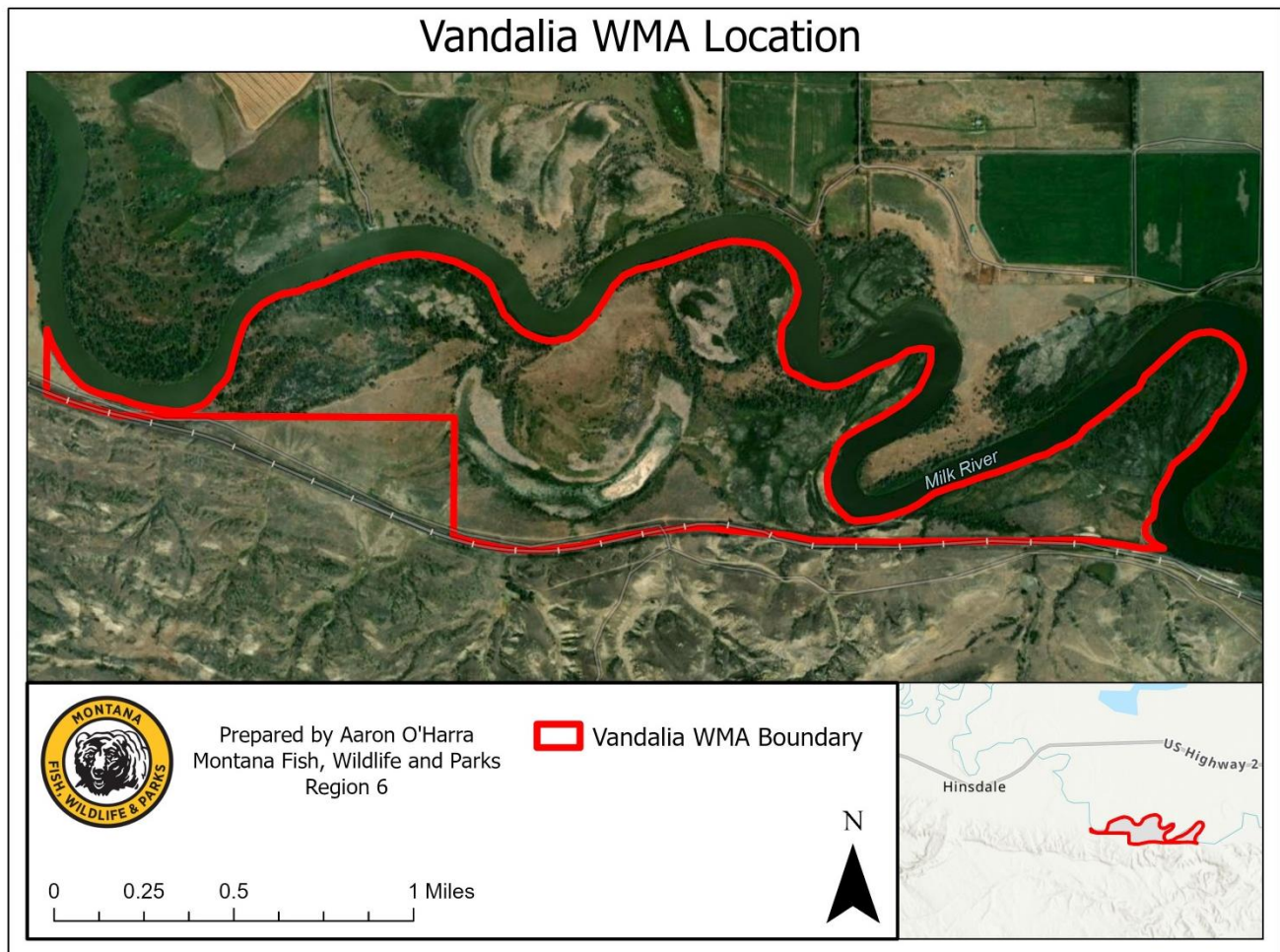
The purpose of this proposed project is to enter into a new 20-year Management Agreement with BOR that allows FWP to continue management of the Vandalia WMA. A new management agreement between BOR and FWP has been drafted with the intended purpose that the land is to continue to be managed for public recreation, wildlife, and other resource uses by FWP.

Public recreation on the Vandalia WMA is provided mainly in the forms of wildlife viewing, hunting, and fishing. All three of these forms of recreation are improved when habitats are in good condition. Specific habitat objectives identified in the previous MOU, and still considered important for the proposed project, include providing high quality nesting, brood rearing, and winter cover for upland game birds and improved year-round habitat for white-tailed deer, with an emphasis on fawning and security habitat. In conformance with the previous MOU, prescribed livestock grazing has been the primary method to accomplish those habitat goals on the Vandalia WMA and would remain a valuable tool in FWP’s continued management of the site if the proposed project is approved. When grazing activities are to occur on the WMA, the grazing will be done in accordance with FWP grazing standards with the focus of those grazing activities being on improving specified habitat objectives.

Affected Area / Location of Proposed Project:

- Legal Description
 - Latitude/Longitude: 48.37637, -107.00523
 - Township 30 North, Range 36 East, Valley County, Montana
 - Section 2 Lots 9 and 10
 - Section 10 Lots 1 and 3
 - Section 11 Lots 2, 3, 5, 6 and SE1/4 NW1/4, NW1/4 NW1/4, SW1/4 NE1/4)
 - Section 12 Lots 2, 5, 7, 8, and 9
 - Town/City, County, Montana:
 - Hinsdale, Valley County, Montana

- Location Map



III. Purpose and Need

The EA must include a description of the purpose and need or benefits of the proposed project. ARM 12.2.432(3)(b). Benefits of the proposed project refer to benefits to the resource, public, department, state, and/or other.

The purpose of the proposed project is to continue FWP's management of the Vandalia WMA through entering into a 20-year management agreement with BOR for the benefit of public recreation, wildlife, and other resource uses. Vandalia WMA currently provides recreational opportunities in the form of hunting, fishing, and wildlife viewing, along with providing forage for land managers to graze cattle. By continuing FWP's management of this site, wildlife habitat values will continue to be improved upon and any livestock grazing will be managed in such a way to improve habitat conditions.

Benefits of FWP's continued management of the Vandalia WMA include:

- Improved nesting, brood rearing, and winter cover for upland birds
- Improved nesting cover for waterfowl
- Improved forage conditions for big game species
- Improved soil and vegetative health through prescriptive grazing strategies
- Continued weed management to prevent/control infestations
- Continued public recreation focus to management objectives

If FWP prepared a cost/benefit analysis before completion of the EA, the EA must contain the cost/benefit analysis or a reference to it. ARM 12.2.432(3)(b).

| | Yes* | No |
|--|--------------------------|-------------------------------------|
| Was a cost/benefit analysis prepared for the proposed project? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* If yes, a copy of the cost/benefit analysis prepared for the proposed project is included in Attachment A to this Draft EA

IV. Other Agency Regulatory Responsibilities

FWP must list any federal, state, and/or local agencies that have overlapping or additional jurisdiction, or environmental review responsibility for the proposed project, as well as permits, licenses, and other required authorizations. ARM 12.2.432(3)(c).

*A list of other required local, state, and federal approvals, such as permits, certificates, and/or licenses from affected agencies is included in **Table 1** below. **Table 1** provides a summary of requirements but does not necessarily represent a complete and comprehensive list of all permits, certificates, or approvals needed for the proposed project. Agency decision-making is governed by state and federal laws, including statutes, rules, and regulations, that form the legal basis for the conditions the proposed project must meet to obtain necessary permits, certificates, licenses, or other approvals. Further, these laws set forth the conditions under which each agency could deny the necessary approvals.*

Table 1: Federal, State, and/or Local Regulatory Responsibilities

| Agency | Type of Authorization (permit, license, stipulation, other) | Purpose |
|----------------------------|---|--|
| USDI Bureau of Reclamation | Stipulation | Right upon request to issue ground-disturbing use authorization requests |
| | | |
| | | |

V. List of Mitigations, Stipulations

Mitigations, stipulations, and other enforceable controls required by FWP, or another agency, may be relied upon to limit potential impacts associated with a proposed Project. The table below lists and evaluates enforceable conditions FWP may rely on to limit potential impacts associated with the proposed Project. ARM 12.2.432(3)(g).

Table 2: Listing and Evaluation of Enforceable Mitigations Limiting Impacts

| Are enforceable controls limiting potential impacts of the proposed action? If not, no further evaluation is needed. | | | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|--|--------------------|--|--|-----------------------------|
| If yes, are these controls being relied upon to limit impacts below the level of significance? If yes, list the enforceable control(s) below | | | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Enforceable Control | Responsible Agency | Authority (Rule, Permit, Stipulation, Other) | Effect of Enforceable Control on Proposed Project | |
| Grazing Lease | FWP | Grazing Lease | Details grazing timing and duration to maintain and encourage native plant composition | |
| | | | | |
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|--|--|--|--|
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| | | | |

VI. Alternatives Considered

In addition to the proposed project, and as required by MEPA, FWP analyzes the "No-Action" alternative in this EA. Under the "No Action" alternative, the proposed project would not occur. Therefore, no additional impacts to the physical environment or human population in the analysis area would occur. The "No Action" alternative forms the baseline from which the potential impacts of the proposed Project can be measured.

Alternative 1: No Action. Under the no action alternative, FWP would not continue management of the Vandalia WMA. Management of the public recreation, wildlife, and other resource uses would revert to the BOR. The BOR would have the ability to limit or expand public recreational use and the ability to issue grazing permits.

| | | |
|---|--------------------------|-------------------------------------|
| | Yes* | No |
| Were any additional and reasonable alternatives considered? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* If yes, a list and description of the other alternatives considered, but not carried forward for detailed review is included below

| | | |
|--|--------------------------|-------------------------------------|
| | Yes* | No |
| Were any additional alternatives considered and dismissed for cause? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* If yes, a list and description of the other alternatives considered, but not carried forward for detailed review, is included below

VII. Summary of Potential Impacts of the Proposed Project on the Physical Environment and Human Population

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

- **Direct impacts** are those that occur at the same time and place as the action that triggers the effect.
- **Secondary impacts** “are further impacts to the human environment that may be stimulated or induced by or otherwise result from a direct impact of the action.” ARM 12.2.429(18).
- **Cumulative impacts** “means the collective impacts on the human environment of the proposed action when considered in conjunction with other past and present actions related to the proposed action by location or generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures.” ARM 12.2.429(7).

*Where impacts are expected to occur, the impact analysis estimates the **extent, duration, frequency, and severity** of the impact. The duration of an impact is quantified as follows:*

- **Short-Term:** impacts that would not last longer than the proposed project.
- **Long-Term:** impacts that would remain or occur following the proposed project.

The severity of an impact is measured using the following:

- **No:** there would be no change from current conditions.
- **Negligible:** an adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor:** the effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate:** the effect would be easily identifiable and would change the function or integrity of the resource.
- **Major:** the effect would irretrievably alter the resource.

Some impacts may require mitigation. As defined in ARM 12.2.429, mitigation means:

- Avoiding an impact by not taking a certain action or parts of a project;
- Minimizing impacts by limiting the degree or magnitude of a project and its implementation;
- Rectifying an impact by repairing, rehabilitating, or restoring the affected environment; or
- Reducing or eliminating an impact over time by preservation and maintenance operations during the life of a project or the time period thereafter that an impact continues.

A list of any mitigation strategies including, but not limited to, design, enforceable controls or stipulations, or both, as applicable to the proposed project is included in **Section VI** above.

FWP must analyze impacts to the physical and human environment for each alternative considered. The proposed project considered the following alternatives:

- **Alternative 1: No Action. Evaluation and Summary of Potential Impacts on the Physical Environment and Human Population**

Under the “No Action” alternative, the proposed project would not occur. Therefore, no cumulative impacts to the affected human environment would occur. The “No Action” alternative forms the baseline from which the potential impacts of the proposed project are measured.

If No Action were taken, FWP would not continue management of the Vandalia WMA. Management of the public recreation, wildlife, and other resource uses would revert to the BOR. The BOR would have the ability to limit or expand public recreational use and the ability to issue grazing permits.

- **Alternative 2: Proposed Project. Evaluation and Summary of Potential Impacts on the Physical Environment and Human Population**

See *Cumulative Impacts Analysis: Table 3, Impacts on Physical Environment*; and *Table 4, Impacts on Human Population*, below.

VIII. Cumulative Impacts Analysis

For the purposes of MEPA, "cumulative impact" means the collective impacts on the human environment of the proposed action when considered in conjunction with other past and present actions related to the proposed action by location or generic type. Related future actions must also be considered when such actions are under concurrent

consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures. ARM 12.2.429(7).

"Action" means a project, program or activity directly undertaken by the agency; a project or activity supported through a contract, grant, subsidy, loan or other form of funding assistance from the agency, either singly or in combination with one or more other state agencies; or a project or activity involving the issuance of a lease, permit, license, certificate, or other entitlement for use or permission to act by the agency, either singly or in combination with other state agencies. ARM 12.2.429(1).

Under the "No Action" alternative, the proposed project would not occur. Therefore, no cumulative impacts to the affected human environment would occur. The "No Action" alternative forms the baseline from which the potential impacts of the proposed project are measured. Past and present actions are accounted for as part of the existing, or "baseline," environmental conditions of the affected human environment prior to approval and implementation of the proposed project, and any known future related project(s).

For the purposes of the proposed project, the cumulative impacts analysis applies to all resources analyzed under Alternative 2, Proposed Project. See Tables 3 and 4 of this Draft EA.

Table 3 - Potential Impacts of Proposed Project on the Physical Environment

| PHYSICAL ENVIRONMENT | | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--|
| Resource | | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| Terrestrial, avian, and aquatic life and habitats | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>No significant adverse impacts would be expected because of the proposed project. A primary goal of WMAs is to emphasize the occurrence of highly productive, diverse plant communities that will provide high quality forage and cover for native wildlife species. Non-native tree species, such as Russian Olive (<i>Eleagnus angustifolia</i>), may be removed in areas where their growth limits native vegetation. Removal of these species is expected to reduce preferred habitat for some upland bird species (e.g. pheasants) in the short-term, but will promote the health and growth of native riparian plant species and habitats in the long-term. Decadent residual vegetation could be removed by grazing and thereby alter some terrestrial habitats. Livestock grazing activities would reduce the amount of forage and cover in a particular pasture during the period the pasture is grazed, possibly displacing big game, upland birds, and waterfowl during that time. However, it is expected that the proposed project would have beneficial long-term impacts on big game, upland birds, and waterfowl, particularly on forage availability and quality for all species and nesting cover for upland birds and waterfowl. The removal of decadent residual vegetation through grazing cattle would enhance spring green-up conditions and provide more palatable forage for grazing wildlife. Limiting livestock grazing in riparian areas is expected to increase occurrence and condition of cottonwood, green ash, willow, and other riparian plant communities. This would increase habitat available for white-tailed and mule deer, moose, pheasants, sharp-tailed grouse, and other non-game animal and avian species. Surface water would be used for</p> |

| PHYSICAL ENVIRONMENT | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|---|
| Resource | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | watering livestock. When present, livestock may congregate near water sources causing increased turbidity and deposition of wastes, which may adversely impact aquatic life and habitats. However, because the WMA has historically been used for grazing, any impact to aquatic life and habitats would be consistent with current and historic impacts. Impacts would be short and long-term, adverse, beneficial, and minor, which is consistent with current and historic impacts, and mitigated by prescriptive grazing strategies. |
| Water quality, quantity, and distribution | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. Water for livestock would be limited to surface water sources, consistent with historic use. Therefore, no changes to water quantity and distribution would be expected because of the proposed project. Livestock may congregate near water sources causing increased turbidity and deposition of wastes, which may adversely impact water quality. Prescriptive grazing practices would allow flexibility to pursue grazing approaches where impacts to water quality would be minimal, such as grazing after ground freeze up or providing rest to different riparian areas along the Milk River in subsequent years on the WMA. Impacts would be short-term, adverse, negligible, and mitigated by prescriptive grazing strategies. |
| Geology | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. No known important or unique geologic structures or formations are located within the WMA and the proposed public use and grazing activities would not directly affect the geologic surface of the affected area. Further, the affected area has historically been used for grazing; therefore, any potential impacts to geology in the affected area would already |

| PHYSICAL ENVIRONMENT | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|---|
| Resource | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | have been realized. Therefore, no additional impacts to geology would be expected because of the proposed project. |
| Soil quality, stability, and moisture | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. Some impacts to soil conditions may occur due to trampling, creation and use of cattle trails, or grazing in localized areas, particularly around water sources. Hoof action from livestock grazing would have positive effects on soil quality by breaking down old residual vegetative material, thus returning nutrients to the soil and seed planting. Prescriptive grazing practices would continue to maintain or improve vegetative cover, and maintain or increase riparian vegetation, which would also reduce or minimize soil erosion for the long-term. Any impacts to soil quality, stability, and moisture would be short-term, minor, adverse, beneficial, and mitigated by prescriptive grazing practices. |
| Vegetation cover, quantity, and quality | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. A primary goal of WMAs is to emphasize the occurrence of highly productive, diverse plant communities that will provide high quality forage and cover for native wildlife species. Non-native tree species, such as Russian Olive (<i>Eleagnus angustifolia</i>), may be removed in areas where their growth limits native vegetation. Removal of these species is expected to reduce cover and forage in the short-term, but will promote the health and growth of native riparian shrub and tree species in the long-term. Wildlife species, cattle, and flood events have been known to spread noxious weeds on the WMA. FWP previously managed noxious weeds on the Vandalia WMA through chemical and biological control per the guidelines set forth in MFWP's |

| PHYSICAL ENVIRONMENT | | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|----------------------|--|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--|
| Resource | | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | | <p>2008 Integrated Noxious Weed Management Plan and the proposed project would continue that management practice. Grazing on the WMA may impact the diversity, productivity, and abundance of standing cover. Livestock grazing may result in both beneficial and adverse impacts on vegetation productivity and diversity depending on how it is managed (e.g., timing, duration, and intensity of grazing). Prescriptive grazing strategies would support productivity and overall health of native vegetation on the WMA. Prescriptive grazing would continue to enhance the availability and palatability of forage in the area for both livestock and wildlife. Plant and soil disturbance from cattle grazing may enhance seed placement, germination, and seedling establishment for native plant species. In addition, grazing would be expected to reduce potential fire danger through periodic removal of old standing vegetation. Prescriptive grazing practices would also improve cottonwood, green ash and willow plant communities in the riparian areas. The acres grazed by the cattle would continue to be monitored for new noxious weed infestations. Any impacts would be short and long-term, beneficial, minor, and mitigated by prescriptive grazing practices and active monitoring for and removal of noxious weeds, as needed.</p> |
| Aesthetics | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>No significant adverse impacts would be expected because of the proposed project. Public recreational use of the area would continue and is expected to be consistent with past levels of use. Domestic livestock and signs of livestock use on the Vandalia WMA may be objectionable to some segments of the public. However, livestock have historically used the WMA for grazing; therefore, any impacts would be consistent with historic use and the existing aesthetic nature of the WMA. Overall,</p> |

| PHYSICAL ENVIRONMENT | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--|
| | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | any impacts would be short-term, minor, consistent with historic impacts, and mitigated by prescriptive grazing practices. |
| Air quality | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. Air quality in the area affected by the proposed project is currently unclassifiable or in compliance with applicable national and Montana ambient air quality standards (NAAQS/MAAQS). Further, no significant point-sources of air pollution exist in the area affected by the proposed project. Existing sources of air pollution in the area are limited and generally include fugitive dust associated with high wind events and exposed ground, vehicle travel on unpaved roads (fugitive dust), vehicle exhaust emissions, and various agricultural practices (vehicle exhaust emissions and fugitive dust). Any impacts to air quality would be short-term, negligible, and consistent with existing impacts. |
| Unique, endangered, fragile, or limited environmental resources | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The potential for animal Species of Concern and Threatened or Endangered species to occur within the affected area was assessed using Montana Natural Heritage Program data. Species of Concern and Threatened or Endangered species that have been observed in the affected area include 2 species of mammals: Little Brown Myotis (<i>Myotis lucifugus</i>) and the Hoary Bat (<i>Lasiurus cinereus</i>); 5 species of birds: Great Blue Heron (<i>Ardea Herodias</i>), Greater Sage-Grouse (<i>Centrocercus urophasianus</i>), American Bittern (<i>Botaurus lentiginosus</i>), American White Pelican (<i>Pelecanus erythrorhynchos</i>), and Red-headed Woodpecker (<i>Melanerpes erythrocephalus</i>); and 4 species of fish: Iowa Darter (<i>Etheostoma exile</i>), Northern Pearl Dace (<i>Margariscus nachtriebi</i>), Northern Redbelly Dace |

| PHYSICAL ENVIRONMENT | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--|
| | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | (<i>Chrosomus eos</i>), and Sauger (<i>Sander canadensis</i>). The proposed project is expected to promote better-quality wildlife habitat for affected game and nongame species. Therefore, any impacts to unique, endangered, fragile, or limited environmental resources that may be located within or near the affected area would be short-term, beneficial, and negligible. |
| Historical and archaeological sites | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | FWP Heritage Specialist, Brenna Moloney, conducted a record search of the Montana State Historic Preservation Office's Cultural Resource Database on October 28, 2024. This search revealed 16 previously recorded heritage sites within the project area, of which 1 is eligible for listing in the National Register of Historic Places (Historic Irrigation System – 24VL1501), 2 are ineligible (Precontact Lithic Material Concentration – 24VL1516 & 24VL1517), and 13 are unresolved (Historic Homestead/Farmstead – 24VL1511 & 24VL1515; Precontact Lithic Material Concentration – 24VL1504, 24VL1505, 24VL1506, 24VL1507, 24VL1508, 24VL1509, 24VL1510, 24VL1512, 24VL1513, 24VL1514, & 24VL1518). No significant adverse impacts would be expected because of the proposed project. The project area has a history of being altered through farming and grazing practices prior to FWP's management of the site beginning in 1994. The proposed project would not see any new ground disturbance and therefore no impact to any historical and archaeological sites in the project area. In keeping with the Montana Antiquities Act and related regulations (12.8.501-12.8.510), all undertakings on state lands are assessed by a qualified archaeologist or historian for their potential to affect cultural resources. The process for this assessment may include a cultural resource inventory and evaluation of cultural resources within or near the project area, in |

| PHYSICAL ENVIRONMENT | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|---|
| | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | consultation with the State Historic Preservation Office. FWP also consults with all Tribal Historic Preservation Offices affiliated with each property in accordance with FWP's Tribal Consultation Guidelines. If cultural resources within or near the project area are recorded that are eligible for the National Register of Historic Places, they will be protected from adverse effects through adjustments to the project design or cancellation of the project if no design alternatives are available. If cultural resources are unexpectedly discovered during project implementation, FWP will cease implementation, and contact FWP's Heritage Program for further evaluation. |
| Demands on environmental resources of land, water, air, and energy | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. No increased use of fuel would be required for the proposed project; therefore, no impacts to the environmental resource of energy would be expected because of the proposed project. As identified previously through the analyses of potential impacts to water quality, quantity, and distribution; soil quality, stability, and moisture; vegetation cover, quantity, and quality; and air quality; some impacts to the environmental resources of land, water, and air may occur because of the proposed project. However, any such impacts would be consistent with current and historic impacts and mitigated by prescriptive grazing practices. Therefore, any impacts would be short-term, beneficial, adverse, negligible and minor (see cited impacts analyses above). No other impacts to the demands on environmental resources of land, water, air, and energy would be expected because of the proposed project. |

Table 4 - Potential Impacts of Proposed Project on the Human Population

| HUMAN POPULATION | Duration of Impact | | | Severity of Impact | | | | | |
|-----------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--|
| Resource | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
| Social structures and mores | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. A primary goal of the Vandalia WMA is to manage habitats for the benefit of wildlife, emphasizing the occurrence of highly productive, diverse plant communities that will provide high quality forage and cover for native wildlife species. Additionally, most public use of the WMA is for hunting of upland birds and big game. The proposed project would be consistent with historic use by continuing to allow for livestock grazing activity on the WMA as a tool to achieve that goal. Therefore, the proposed project would not impact any pre-project social structures, customs, values, and conventions in the affected area. |
| Cultural uniqueness and diversity | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project would continue historic FWP management practices on the WMA including the potential for grazing and would not result in any new or changed employment opportunities. Therefore, the proposed project is not expected to result in any relocation of people into or out of the affected area. No impacts to the existing cultural uniqueness and diversity of the affected area would be expected because of the proposed project |

| HUMAN POPULATION | | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|--|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|---|
| Resource | | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| Access to and quality of recreational and wilderness activities | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. No Wilderness areas exist in the affected area; therefore, no impacts to Wilderness recreation activities would occur because of the proposed project. WMAs are open to public access and use. No closure of WMA access would occur because of the proposed project. Livestock have historically used the WMA for grazing and could continue to do so under the proposed action. Further, livestock presence is a common occurrence on Montana's landscapes, including WMAs. The presence of livestock on the WMA may be viewed by some as decreasing the quality of recreational activities on the WMA. When livestock grazing occurs, prescriptive grazing strategies would be implemented ensuring some pastures within the WMA are free from livestock and available for recreational use every year, without the presence of livestock. Any impacts would be short-term, minor, consistent with current and historic impacts, and mitigated by prescriptive grazing practices. |
| Local and state tax base and tax revenues | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. BOR would retain ownership of the land and any tax responsibilities. The proposed project would continue to allow for historic livestock grazing activities on the WMA. The number of cattle to be grazed in the area may be altered to achieve specific habitat goals. The amount of AUMs allocated has historically been kept low, creating minimal revenue for both local and state taxes. Adjusting a minor revenue source by small quantities is not expected to have significant impacts to local and state tax base and tax revenue. Therefore, any impacts to local and state tax base and tax revenue would be short-term and negligible. |

| HUMAN POPULATION | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--|
| Resource | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| Agricultural or Industrial production | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project would benefit agricultural production by continued support of grazing activities on the Vandalia WMA. Industrial production is not allowed on public lands designated as a WMA. Therefore, no impact to industrial or agricultural production would be expected because of the proposed project. |
| Human health and safety | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project includes ongoing monitoring and treatment of noxious weeds potentially spread by wildlife, cattle, and flood events. Chemical and biological treatment is part of MFWP's weed management plan to limit the infestation of noxious weeds on its properties per the guidance of the 2008 Integrated Weed Management Plan. Weed treatment and storage and mixing of the chemicals would be in accordance with standard operating procedures. Therefore, any impacts would be short-term and negligible, occurring only during the application of chemical or biological weed control and would only impact affected staff. |
| Quantity and distribution of employment | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project includes a continuation of FWP management of the land and allows for continued livestock grazing on the WMA. Therefore, the proposed project would not increase or reduce employment opportunities in the affected area. No impacts would be expected because of the proposed project |
| Distribution and density of | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project constitutes a continuation of previous activities on the |

| HUMAN POPULATION | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|---|
| | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| population and housing | | | | | | | | | WMA and would not result in the movement of existing or new population into or out of the affected area. Therefore, no impacts to the distribution and density of population and housing needs would be expected because of the proposed project. |
| Demands for government services | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project constitutes a continuation of FWP management and allows for continued historic grazing activity on the WMA; therefore, much of the infrastructure and equipment needed to implement a grazing system is already in place. Normal and routine maintenance costs, including boundary and public use signage, monitoring and control of noxious weeds, vegetation monitoring, and light road maintenance would continue because of the proposed project. Some additional fence may be required to implement the prescriptive grazing strategies, but these additional demands would be in the form of a one-time cost to install new fence, with the exception of routine maintenance costs. Therefore, impacts on demands for government services would be short-term and minor because of the proposed project. |
| Industrial, agricultural, and commercial activity | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The proposed project is compatible with agricultural activities by continued support of grazing on the Vandalia WMA. Industrial production is not allowed on public lands designated as a WMA. Therefore, no impact to industrial or agricultural activity would be expected because of the proposed project. |
| Locally adopted environmental plans and goals | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. The affected property is currently, and would remain, a designated WMA. A |

| HUMAN POPULATION | Duration of Impact | | | Severity of Impact | | | | | Summary of Potential Direct, Secondary, and Cumulative Impacts and Mitigation Measures |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--|
| | None | Short-Term | Long-Term | None | Negligible | Minor | Moderate | Major | |
| | | | | | | | | | primary goal of WMAs is to emphasize the occurrence of highly productive, diverse plant communities that will provide high quality forage and cover for native wildlife species. The proposed project would further such goals on the WMA. FWP is unaware of any other locally adopted environmental plans or goals that may be impacted by the proposed project. Therefore, no additional impacts to locally adopted environmental plans and goals would be expected because of the proposed project. |
| Other appropriate social and economic circumstances | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No significant adverse impacts would be expected because of the proposed project. FWP is unaware of any other appropriate social and economic circumstances that may be impacted by the proposed project. Therefore, no significant adverse impacts would be expected because of the proposed project. |

Table 6: Determining the Significance of Impacts on the Quality of the Human Environment

| | |
|---|---|
| <p>If the EA identifies impacts associated with the proposed project FWP must determine the significance of the impacts. ARM 12.2.431. This determination forms the basis for FWP's decision as to whether it is necessary to prepare an environmental impact statement. An impact may be adverse, beneficial, or both. If none of the adverse effects of the impact are significant, an EIS is not required. An EIS is required if an impact has a significant adverse effect, even if the agency believes that the effect on balance will be beneficial. ARM 12.2.431.</p> <p>According to the applicable requirements of ARM 12.2.431, FWP must consider the criteria identified in this table to determine the significance of each impact on the quality of the human environment. The significance determination is made by giving weight to these criteria in their totality. For example, impacts identified as moderate or major in severity may not be significant if the duration is short-term. However, moderate or major impacts of short-term duration may be significant if the quantity and quality of the resource is limited and/or the resource is unique or fragile. Further, moderate or major impacts to a resource may not be significant if the quantity of that resource is high or the quality of the resource is not unique or fragile.</p> | |
| Criteria Used to Determine Significance | |
| 1 | <p>The severity, duration, geographic extent, and frequency of the occurrence of the impact</p> <p>"Severity" describes the density of the potential impact, while "extent" describes the area where the impact will likely occur, e.g., a project may</p> |

| | |
|---|--|
| | <p>propagate ten noxious weeds on a surface area of 1 square foot. Here, the impact may be high in severity, but over a low extent. In contrast, if ten noxious weeds were distributed over ten acres, there may be low severity over a larger extent.</p> <p>“Duration” describes the time period during which an impact may occur, while “frequency” describes how often the impact may occur, e.g., an operation that uses lights to mine at night may have frequent lighting impacts during one season (duration).</p> |
| 2 | The probability that the impact will occur if the proposed project occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur |
| 3 | Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts |
| 4 | The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values |
| 5 | The importance to the state and to society of each environmental resource or value that would be affected |
| 6 | Any precedent that would be set as a result of an impact of the proposed project that would commit FWP to future actions with significant impacts or a decision in principle about such future actions |
| 7 | Potential conflict with local, state, or federal laws, requirements, or formal plans |

IX. Private Property Impact Analysis (Takings)

The 54th Montana Legislature enacted the Private Property Assessment Act, now found at § 2-10-101. The intent was to establish an orderly and consistent process by which state agencies evaluate their proposed projects under the "Takings Clauses" of the United States and Montana Constitutions. The Takings Clause of the Fifth Amendment of the United States Constitution provides: "nor shall private property be taken for public use, without just compensation." Similarly, Article II, Section 29 of the Montana Constitution provides: "Private property shall not be taken or damaged for public use without just compensation..."

The Private Property Assessment Act applies to proposed agency projects pertaining to land or water management or to some other environmental matter that, if adopted and enforced without due process of law and just compensation, would constitute a deprivation of private property in violation of the United States or Montana Constitutions.

The Montana State Attorney General's Office has developed guidelines for use by state agencies to assess the impact of a proposed agency project on private property. The assessment process includes a careful review of all issues identified in the Attorney General's guidance document (Montana Department of Justice 1997). If the use of the guidelines and checklist indicates that a proposed agency project has taking or damaging implications, the agency must prepare an impact assessment in accordance with Section 5 of the Private Property Assessment Act.

Table 7: Private Property Assessment (Takings)

| PRIVATE PROPERTY ASSESMENT ACT (PPAA) | | | |
|---|------------|--------------------------|-------------------------------------|
| Does the Proposed Action Have Takings Implications under the PPAA? | Question # | Yes | No |
| Does the project pertain to land or water management or environmental regulations affecting private property or water rights? | 1 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does the action result in either a permanent or an indefinite physical occupation of private property? | 2 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does the action deprive the owner of all economically viable uses of the property? | 3 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does the action require a property owner to dedicate a portion of property or to grant an easement? (If answer is NO, skip questions 4a and 4b and continue with question 5) | 4 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Is there a reasonable, specific connection between the government requirement and legitimate state interest? | 4a | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the government requirement roughly proportional to the impact of the proposed use of the property? | 4b | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the action deny a fundamental attribute of ownership? | 5 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does the action have a severe impact of the value of the property? | 6 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public general? (If the answer is NO, skip questions 7a-7c.) | 7 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Is the impact of government action direct, peculiar, and significant? | 7a | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the government action resulted in the property becoming practically inaccessible, waterlogged, or flooded? | 7b | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the government action diminished property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question? | 7c | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the proposed action result in taking or damaging implications? | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Taking or damaging implications exist if **YES** is checked in response to Question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if **NO** is checked in response to question 4a or 4b.

If taking or damaging implications exist, the agency must comply with MCA § 2-10-105 of the PPAA, to include the preparation of a taking or damaging impact assessment. Normally, the preparation of an impact assessment will require consultation with agency legal staff.

Alternatives:

The analysis under the Private Property Assessment Act, §§ 2-10-101 through -112, MCA, indicates no impact. FWP does not plan to impose conditions that would restrict the regulated person's use of private property to constitute a taking.

X. Public Participation

The level of analysis in an EA will vary with the complexity and seriousness of environmental issues associated with a proposed action. The level of public interest will also vary. FWP is responsible for adjusting public review to match these factors (ARM 12.2.433(1)). Because FWP determines the proposed action will result in limited environmental impact, and little public interest has been expressed, FWP determines the following public notice strategy will provide an appropriate level of public review:

- *An EA is a public document and may be inspected upon request. Any person may obtain a copy of an EA by making a request to FWP. If the document is out-of-print, a copying charge may be levied (ARM 12.2.433(2)).*
- *Public notice will be served on the Montana Fish, Wildlife and Parks website at: <https://fwp.mt.gov/news/public-notices>. Public notice will announce the availability of the Draft EA, summarize its content, and solicit public comment.*
- *Copies will be distributed to neighboring landowners to ensure their knowledge of the proposed project and opportunity for review and comment on the proposed action.*
- *FWP maintains a mailing list of persons interested in a particular action or type of action. FWP will notify all interested persons and distribute copies of the Draft EA to those persons for review and comment (ARM 12.2.433(3)).*
- *FWP issues a biweekly press release containing all FWP public commenting opportunities.*
- ***Duration of Public Comment Period:*** *The public comment period begins on the date the Draft EA is published on FWP's website. Written or e-mailed comments will be accepted until 5:00 p.m., MST, on the last day of public comment period, as listed below:*

| | |
|---|------------|
| Length of Public Comment Period: | 16 days |
| Public Comment Period Begins: | 11/14/2024 |
| Public Comment Period Ends: | 11/29/2024 |

Comments must be addressed to the FWP contact, as listed below.

- ***Where to Mail or Email Comments on the Draft EA:***

Name: AARON O'HARRA

Email: aaron.o'harra@mt.gov

Mailing Address:

Montana Fish, Wildlife and Parks

ATTN: Aaron O'Harra

1 Airport Rd

Glasgow, MT 59230

XI. Recommendation for Further Environmental Analysis

| | |
|--|-------------------------------------|
| NO further analysis is needed for the proposed action | <input checked="" type="checkbox"/> |
| FWP must conduct EIS level review for the proposed action | <input type="checkbox"/> |

XII. EA Preparation and Review

| | Name | Title |
|------------------------|----------------|---------------------------------|
| EA prepared by: | Aaron O’Harra | Glasgow Area Wildlife Biologist |
| EA reviewed by: | Scott Thompson | Region 6 Wildlife Manager |