DRAFT

ENVIRONMENTAL ASSESSMENT

CHECKLIST

Craig Fishing Access Site Overflow Parking Lot

May 4th, 2023

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I. Compliance with the Montana Environmental Policy Act

This Environmental Assessment was prepared in compliance with the Montana Environmental Policy Act (MEPA).

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

This section includes a short description of the proposed project including the project sponsor/ applicant/ responsible party, the type of proposed action and the anticipated schedule of the proposed project.

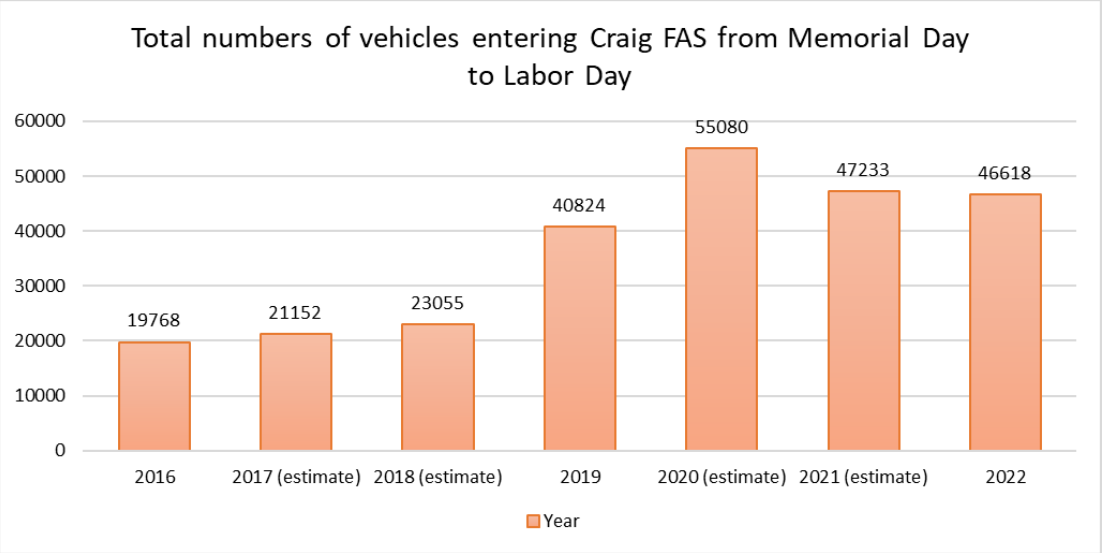
Name of Project: Craig Fishing Access Site Overflow Parking Lot

Montana Fish, Wildlife & Parks (FWP) proposes to construct a gravel parking lot near the Craig Fishing Access Site (FAS), which is a popular put-in and takeout location for watercraft on the Missouri River. The proposed project is intended to alleviate parking issues at the FAS, where the number of vehicles often exceeds the parking capacity during the spring, summer, and early fall (figure 1). Visitation to the FAS has increased over time, with visitation peaking in 2020 (figures 2 and 3). The FAS currently has a day use parking lot capacity of 33 vehicles; 20 of those parking spaces can accommodate vehicles with boat trailers. When visitation exceeds the current parking capacity at the FAS, conflicts arise when people park their vehicles off-site and in front of private residences and businesses located throughout the town of Craig.

To address these issues, FWP proposes to construct an approximate 2-acre overflow parking lot that would provide an additional 50 delineated parking spaces. Twenty-six (26) of the new parking spaces would be large enough to accommodate vehicles with boat trailers, and twenty-three (23) would provide single vehicle parking spaces (figure 4). The proposal includes development of one (1) single vehicle concrete parking space that meets the requirements of the Americans with Disabilities Act (ADA), and an ADA-approved concrete latrine. The overflow parking lot would be constructed on a 3.4-acre parcel of land that Lewis and Clark County leased from the Burlington Northern Santa Fe railroad company (figures 5 and 6). Contingent on approval of the proposed project, FWP would enter into an agreement with Lewis and Clark County whereby FWP would design, construct, and manage the overflow parking lot.

Figure 1 (above): Congested boat ramp area within the Craig FAS

Figure 2 (below): Annual vehicle count data from Memorial Day through Labor Day from 2016-2022. Data indicates an increasing trend with the highest visitation use during the COVID pandemic in 2020. Source: Pinnacle Research and Consulting for Northwestern Energy.



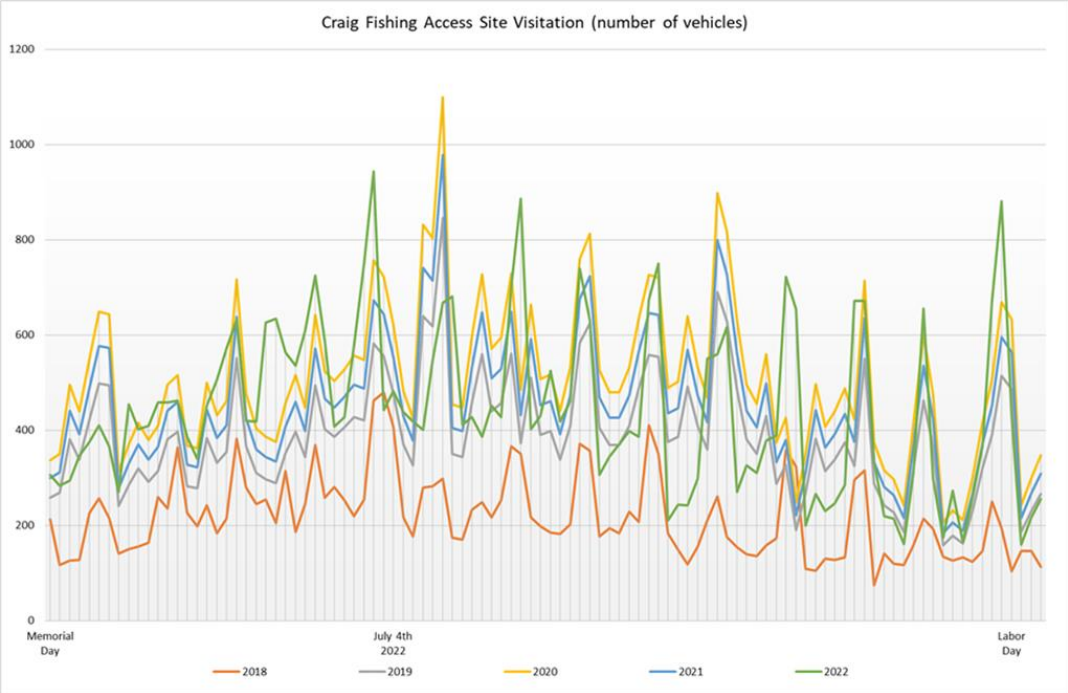


Figure 3 (above): Daily vehicle count data from Memorial Day to Labor Day from 2018-2022. Data indicates heavier use on weekends with peak use occurring late June through early August. Source: Pinnacle Research and Consulting for Northwestern Energy. A complete visitation report of the Missouri River prepared by Pinnacle Research and Consulting for Northwestern Energy can be found at: https://northwesternenergy.com/docs/default-source/default-document-library/clean-energy/environmental-projects/missouri-madison-hydro-project/missouri-madison-visitor-use-count-study-report.pdf

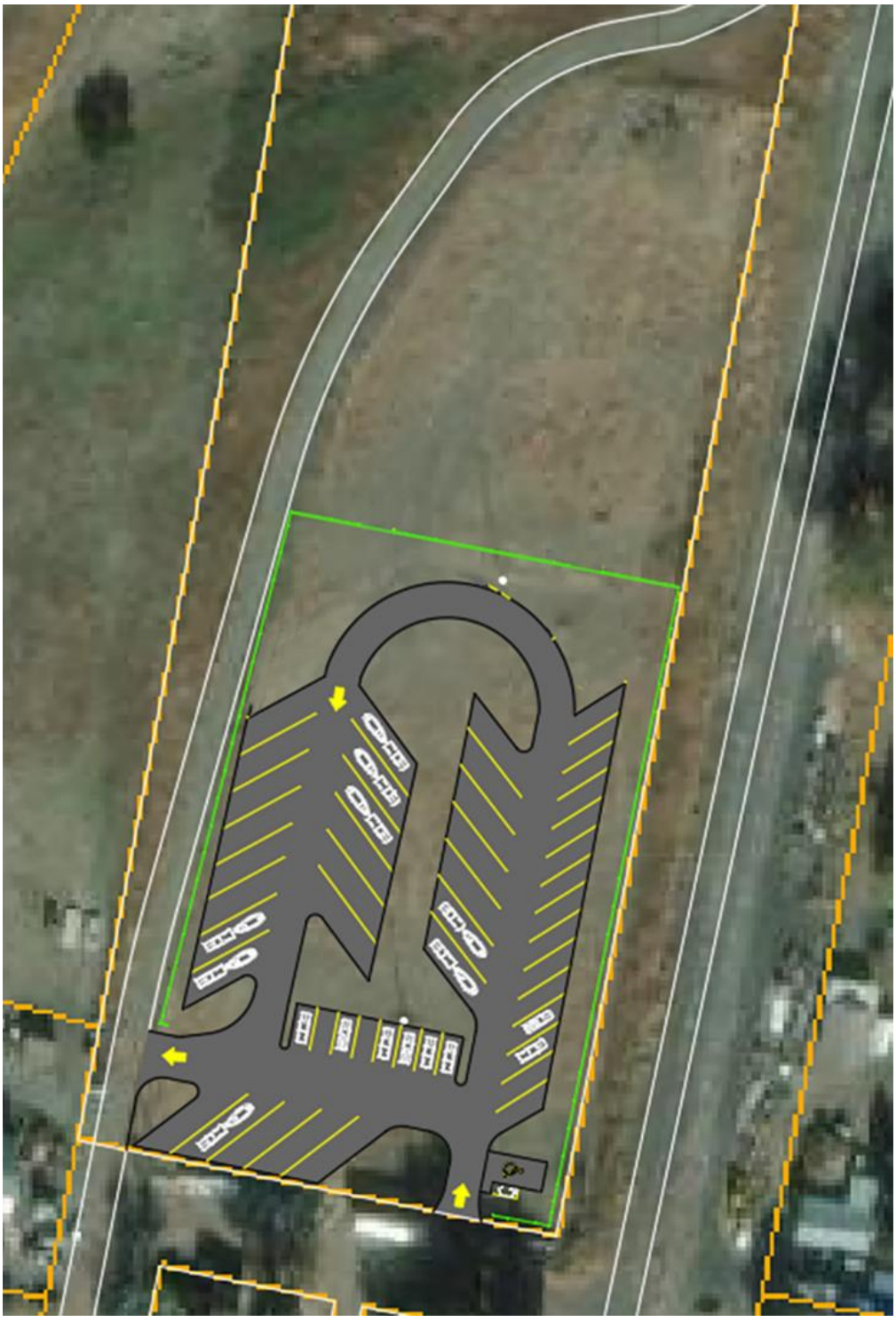


Figure 4 (above): Proposed preliminary design of Craig FAS overflow parking lot.

Figure 5 (above) and 6 (below): Aerial images of Craig FAS and the proposed Craig FAS overflow parking lot.

Anticipated Project Schedule: Subject to availability of contractors and other factors, FWP anticipates the following schedule.

- Estimated Construction Commencement Date: September/October of 2023.
- Estimated Construction Completion Date: December of 2023.

Affected Area / Location of Proposed Project:

- Proposed project is within the unincorporated town of Craig, MT (figure 7).
- Legal Description:
    - Latitude/Longitude: 47.07614, -111.96354
    - Section, Township, and Range: S10, T15N, R3W
    - Town/City, County, Montana: Craig, Lewis and Clark County, Montana

Figure 7 (above): Location of the proposed Craig FAS overflow parking lot.

III. Purpose and Need

An EA must include a description of the benefits and purpose 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 proposed project is intended to address the increasing problem of insufficient parking spaces at the Craig FAS, which results in people parking vehicles off-site in front of private residences and businesses. The development of an overflow parking lot within walking distance of the FAS would meet the needs of the recreating public and address the concerns of private residences and businesses. Benefits would include:

- 24 single vehicle spaces and 26 vehicles with trailer spaces, with the ability to provide some additional overflow parking in the future if deemed necessary and funding allowed.
- ADA-approved parking and concrete latrine.
- Reduction in recreation-related parking and congestion along the streets within Craig.
- Reduction in conflicts from the public parking vehicles in front of private residences and businesses.

Project Funding: FWP did not prepare a cost/benefit analysis for this proposed project. The project would utilize the following funding sources and amounts.

Funding sources for development of the potential Craig FAS overflow parking lot.

Entity	Amount
Missouri-Madison River Fund Grant	$179,662
Northwestern Energy	$49,810
Lewis and Clark County (Lease)	$199,238
Total:	**$428,710**

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 2** below. **Table 2** 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.

Federal, State, and/or Local Regulatory Responsibilities

Agency	Type of Authorization (permit, license, stipulation, other)	Purpose
Lewis and Clark County	Agreement	Lewis and Clark County will enter into an agreement with FWP to use the property leased by Lewis and Clark County for the purpose of operating and maintaining a parking area under the terms and conditions of a cooperative management agreement
Montana State Historic Preservation Office/FWP Heritage Program	Cultural Assessment	By Montana law (22-3-433, MCA), all state agencies are required to consult with the State Historic Preservation Office to identify heritage properties on land owned by the state that may be adversely impacted by a proposed action or development project. Construction of parking areas and other ground disturbing activities would require consultation with the State Historical Preservation Office to ensure adequate protection of such resources.
Montana Department of Environmental Quality	Montana Pollutant Discharge Elimination System (MPDES) Construction Stormwater Permit	Development and Execution of Stormwater Pollution Prevention Plan
Lewis and Clark County	Septic Permit	Installation of a Sealed Vault Latrine (Toilet)

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).

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 ☒**	**No ☐**
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 ☒**	**No ☐**

Enforceable Control	Responsible Agency	Authority (Rule, Permit, Stipulation, Other)	Effect of Enforceable Control on Proposed Project
Cultural Resource Protection	Montana State Historic Preservation Office/FWP Heritage Program	Cultural Assessment and Inventory	A cultural resource inventory will be completed prior to any construction of the project. If cultural resources are unexpectedly discovered during project implementation, FWP will cease implementation, and contact FWP's Heritage Program for further evaluation.

VI. Alternatives Considered

In addition to the proposed project, and as required by MEPA, FWP analyzes the "No-Action" alternative in this Draft 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.

Under the “No-Action” alternative, parking congestion would likely continue at the existing Craig FAS and conflicts due to the recreating public parking their vehicles off-site and often in front of private residences and businesses in Craig would continue.

	Yes*	No
Were any additional alternatives considered and dismissed?	☐	☒

* 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 section of an EA 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 Impact**: there would be no change from current conditions.
- **Negligible**: an adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor**: the effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate**: the effect would be easily identifiable and would change the function or integrity of the resource.
- **Major**: the effect would 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 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 2: Proposed Project. Evaluation and Summary of Potential Impacts on the Physical Environment and Human Population**

  See **Table 4** (Impacts on Physical Environment) and **Table 5** (Impacts on Human Population) below.

Impacts Analysis – Alternative 2: Proposed Action/Project

Table 4: Impacts to the Physical Environment

PHYSICAL ENVIRONMENT	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
Terrestrial, avian, and aquatic life and habitats	☐	☒	☒	☐	☒	☒	☐	☐	There would be no significant adverse impacts to terrestrial, avian, and aquatic life and habitats from the proposed project. The project area for the proposed overflow parking expansion is approximately 3.4 acres and is surrounded by private land. The project area is 100 yards from the interstate highway and does not contain any critical wildlife habitat. The Montana Natural Heritage Program classifies the land cover of the proposed project location as industrial/commercial. The proposed project area is mostly bare ground that has been grazed down by horses. There are anticipated short-term negligible impacts to the abundance and movement of terrestrial and avian species during hours when users are actively engaged at the site. Approximately 2 acres of the property would be gravel covered, of which the long-term impact to habitat is expected to be minor given the current conditions of the property and its proximity to the interstate. The disturbed area not utilized as parking space would be reseeded with native grasses following construction to return it to a more natural state that would offer long-term beneficial habitat improvements compared to the current heavily grazed condition of the ground cover. Any impacts would be short- and long-term,

PHYSICAL ENVIRONMENT	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
									consistent with existing impacts, negligible and minor.
Water quality, quantity, and distribution	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to water quality, quantity, and distribution from the proposed project. The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the FAS and would not require the use of any additional new water resources, nor would it affect the distribution or quality of any existing water resources. The proposed project site lies on the west side of an elevated railroad grade that separates the project site from the Missouri River. The addition of a gravel surface parking area would cause minor, long-term controlled changes to area drainage patterns. The design concept plan anticipates incorporating onsite storage for storm water to prevent or reduce accumulation of rainwater on the parking area surface or over the surface of nearby roadways. FWP would be required to develop and execute a Stormwater Pollution Prevention Plan and obtain a Montana Pollutant Discharge Elimination System (MPDES) Construction Stormwater Permit to mitigate potential water quality impacts. Therefore, any impacts to water quality, quantity and distribution would be long-term, mitigated, and minor.
Geology	☒	☐	☐	☒	☐	☐	☐	☐	The proposed action would have no significant adverse impacts to the geology of the proposed project location. The proposed project constitutes

PHYSICAL ENVIRONMENT	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
									development of overflow parking to alleviate congestion and conflict associated with use of the FAS and would not affect any geologic features in the project area; therefore, no impacts to geology would be expected because of the proposed project.
Soil quality, stability, and moisture	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to soil quality, stability, and moisture from the proposed project. The project area includes Korell Loam soil, consistent with deep, well drained soils according to the Natural Resources Conservation Service Web Soil Survey Map. Construction of the project would result in long-term, minor, and adverse impacts to soil compaction in the area where the parking lot is developed. The preliminary design proposes to use geotextile fabric to help reduce compaction over time. The preliminary design also proposes to use an aggregate surfacing material. Any impacts would be long-term and minor.
Vegetation cover, quantity, and quality	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to the vegetation cover, quantity, and quality from the proposed project. The project parcel includes a mix of short grasses, shrubs, and bare ground that was heavily grazed by horses. The Montana Natural Heritage Program classifies the land cover of the proposed project location as industrial/commercial. The construction of the parking area would have long-term, minor, and adverse impacts to the vegetation cover by disturbing and covering

PHYSICAL ENVIRONMENT	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
									approximately 2 acres of existing vegetation. Areas that are disturbed outside of the designated parking area would be reseeded following construction with native grass and forbs consistent with Rocky Mountain lower montane, foothill, and valley grasslands, which is the prominent landscape surrounding Craig indicated by the Montana Natural Heritage Program. Reseeding the rest of the site would provide long-term and beneficial impacts to the vegetation cover, quantity, and quality over current conditions. Public use of the site and motor vehicle traffic would lead to increased opportunity for noxious weeds to take root. FWP would manage noxious weeds and would use the most effective means, depending on species and location, to eradicate identified noxious weeds. The parking area would be confined to prevent motorized vehicles from disturbing the soil surface outside of the established parking as a preventative measure to further impacts to the vegetation cover.
Aesthetics	☐	☒	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to the aesthetics of the project area because of the proposed project. Short-term and minor adverse aesthetic impacts would likely result from construction of the parking lot due to increased levels of noise, fugitive dust, and the presence of equipment and staged construction materials. Long-term and minor adverse impacts may also result from the development of currently open land to support the proposed project. The Montana

PHYSICAL ENVIRONMENT	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
									Natural Heritage Program classifies the land cover of the proposed project location as industrial/commercial; therefore, any long-term aesthetic impacts would consistent with the area's industrial/commercial classification and minor.
Air quality	☐	☒	☐	☐	☒	☐	☐	☐	There would be no significant adverse impacts to air quality from 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). The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the FAS and, when completed, would not result in additional new air quality impacts in the affected area. 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 unpaved county roads (fugitive dust source), vehicle exhaust emissions, and various agricultural practices (vehicle exhaust emissions and fugitive dust). Fugitive dust and vehicle exhaust emissions resulting from the movement of heavy equipment and materials for the proposed project may adversely impact air quality. However, any impacts to air quality would be short-term, mitigated by dust control practices, consistent with existing impacts within the industrial/commercial area, and negligible.

PHYSICAL ENVIRONMENT	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
Unique, endangered, fragile, or limited environmental resources	☐	☒	☒	☐	☒	☐	☐	☐	There would be no significant adverse impacts to any unique, endangered, fragile, or limited environmental resources because of the proposed project. The presence of any animal and/or plant *Species of Concern*, *Species of Special Status*, and any land classified as *Important Animal Habitat* located within or near the affected area were assessed through the Montana Natural Heritage Program. The following Species of Concern have been observed within or near the affected area: • Bobolink (Dolichonyx Oryzivorus) – Global Rank: G5 State Rank: S3B • Great Blue Heron (Ardea Herodias) – Global Rank: G5 State Rank: S3 • Green-tailed Towhee (Pipilo chorurus) – Global Rank: G5 State Rank: S3B • Long-billed Curlew (Numenius americanus) – Global Rank: G5 State Rank S3B The following animal Species of Special Status have been observed within or near the affected area: • Bald Eagle (Haliaeetus leucocephalus) – Global Rank: G5 State Rank S4 The following *Important Animal Habitat* is present within the immediate area of Craig, Montana: • Bat Roost (Non-Cave) – No Rank, point observations occurring in human created bridges Because the Montana Natural Heritage Program classifies the land cover of the proposed project location as industrial/commercial, any impacts to

PHYSICAL ENVIRONMENT	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
									Species of Concern, *Species of Special Status*, and areas meeting *Important Animal Habitat* status would be short- and long-term, consistent with existing impacts within the industrial/commercial area, and negligible..
Historical and archaeological sites	☒	☐	☐	☒	☐	☐	☐	☐	There would be no significant adverse impacts to the historical sites from the proposed project. According to the applicable requirements of 22-3-433, MCA, construction of parking areas and other ground disturbing activities would require consultation with the State Historical Preservation Office or SHPO. In keeping with the Montana Antiquities Act and related regulations (ARM 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 conducted by FWP's Heritage Program, in consultation with SHPO. FWP also consults with all Tribal Historic Preservation Offices or THPO's affiliated with each property in accordance with FWP's Tribal Consultation Guidelines. On January 24, 2023, a record search of the Montana State Historic Preservation Office's Cultural Resource Database was conducted by FWP's Heritage Program, in consultation with SHPO(figure 8). The search revealed one previously recorded site overlapping the planned project area and no

PHYSICAL ENVIRONMENT	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
									previous cultural resource inventories. The previously recorded site is the Lewis and Clark County segment of the Montana Central Railway (24LC1292), also known as the Main Branch of the Great Northern Railroad. The line was constructed and in use between 1887 and 2000 and connects Helena and Great Falls. The existing train track has been determined eligible for listing in the National Register of Historic Places under Criteria A and B. A cultural resource inventory would be conducted prior to construction of the proposed parking lot to identify any contributing features of site 24LC1292 in the project area, as well as any previously unidentified heritage properties. If cultural resources are discovered during project implementation, FWP will cease implementation and contact FWP's Heritage Program for further evaluation. Therefore, no impacts to any existing historical or archaeological sites would be expected because of the proposed project.
Demands on environmental resources of land, water, air, and energy	☐	☒	☐	☐	☒	☐	☐	☐	There would be no significant adverse impacts to the demands on environmental resources of land, water, air, and energy from the proposed project. The affected industrial/commercial land would be used as a parking area and would not place additional demands on the environmental resources of land, water, and air. Fuel would be required to operate equipment and vehicles used to develop the proposed project. No other demands on the environmental resources of land, water, air,

PHYSICAL ENVIRONMENT	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
									and energy would be expected because of the proposed project. Therefore, any impacts to such resources would be short-term, negligible, and limited to energy resources in the form of fuel.

Figure 8. Cultural Resources Database record search results showing location of sites near project area (left), and 1886 map of project area prior to construction of the railroad (left).

Table 5: Impacts to 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	☐	☐	☒	☐	☐	☐	☐	☐	There would be no significant adverse impacts to pre-project social structures and mores in the affected area because of the proposed project. The Missouri River, which is served by the Craig FAS, is a world class trout fishing resource and destination for anglers from around the world. As such, fishing and related services support existing social structure, customs, values, and conventions in an around the town of Craig. The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the FAS. Therefore, improving existing FAS infrastructure would further support existing social structures and mores in the affected area. Any impacts would be long-term, consistent with existing impacts, and minor.
Cultural uniqueness and diversity	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to cultural uniqueness and diversity in the affected area because of the proposed project. The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the existing FAS. Alleviating issues associated with use of the existing FAS may result in higher use of the FAS and an associated increase in demands for local services. Increased demands for services, as well as an increase in overall use of the FAS, could result in the relocation of people and business into and/or out of the affected area. Because the proposed project

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
									improves an existing FAS that is already experiencing a high level of increased use, any relocation of people would likely be limited. Therefore, any impacts to the existing cultural uniqueness and diversity of the affected area would be long-term and minor.
Access to and quality of recreational and wilderness activities	☐	☐	☒	☐	☐	☐	☒	☐	There would be no significant adverse impacts to the access and quality of recreational activities from 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. No closure of access to public lands would occur because of the proposed project as the proposed new parking lot is physically separated from the existing FAS, which would remain open throughout construction and overall implementation of the proposed project. The proposed project location is privately owned and currently does not provide public access. Development of additional parking to serve the existing FAS would improve existing recreational access. This would allow users to quickly clear the boat ramp area, prepare their equipment away from the boat ramp, and thereby improve access and the overall recreational experience for users. The proposed project would also increase available parking within a designated parking area in lieu of recreational users parking on the streets of Craig. Overflow parking on the streets of Craig often causes conflict between recreational users and

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
									residents. Alleviating such conflict is a primary objective of the proposed project. Any impacts to access to and the quality of recreational and wilderness activities in the affected area would be long-term, beneficial, and moderate.
Local and state tax base and tax revenues	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts to the local and state tax base and tax revenues from the proposed project. There could be minor, short-term, and beneficial impacts to the local and state tax revenues from construction workers who purchase food and goods from local businesses during the project. The community economy is recreation based and the additional public parking area would further support and have long-term, minor, and beneficial impacts to the local economy and subsequently, local tax base and tax revenues.
Agricultural or Industrial production	☒	☐	☐	☒	☐	☐	☐	☐	No significant adverse impacts to agricultural or industrial production would be expected because of the proposed project. The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the nearby existing FAS. The new parking area would be located on land classified as industrial/commercial. Because the affected land is not currently used for, or classified as, agricultural, no impacts to agricultural production would occur because of the proposed project. Further, no existing industrial operations would be displaced by the proposed project. Therefore, no impacts to

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
									agricultural or industrial production would be expected because of the proposed project.
Human health and safety	☐	☒	☒	☐	☐	☒	☒	☐	There would be no significant adverse impacts to the human health and safety from the proposed project. Contractors hired to develop the proposed project may realize increased risk to human health and safety associated with construction and development activities. However, affected contractors would operate in a safe manner using best management practices, including the use of safety precautions. Development of a designated overflow parking lot would limit the potential for human health and safety impacts by decreasing congestion and conflict at the existing FAS and on the streets of Craig Users of the new parking area may realize some increased health and safety risk because the proposed parking area is physically separated from the existing FAS. Users of the new parking area would have to walk along community roads, cross Bridge Road, and cross the existing railroad tracks to reach the existing FAS. Because the railroad tracks have been defunct for many years, no increased risk to human health and safety would occur from users crossing the railroad tracks. Further, overflow parking is currently accommodated by FAS users parking throughout the town of Craig. Therefore, any potential impacts associated with crossing community streets to reach the existing FAS would be consistent with current impacts. Overall, impacts to human health

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
									and safety would be short-term, minor, and adverse; long-term, minor, and adverse; and long-term, moderate, and beneficial.
Quantity and distribution of employment	☐	☒	☒	☐	☒	☐	☐	☐	There would be no significant adverse impact to the quantity and distribution of employment from the proposed project. Some impacts to the local quantity and distribution of employment may be realized because contracted services would be used to develop the proposed project. The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the existing FAS. Alleviating issues associated with use of the existing FAS may result in higher use of the FAS and an associated increase in demands for local services. Increased demands for services could result in increased need for seasonal local employment. Because the proposed project area is already experiencing a high level of increased use, any increase in employment necessary to accommodate higher use would likely be limited. Therefore, any impacts to the quantity and distribution of employment because of the proposed project would be short-term, long-term, and negligible.
Distribution and density of population and housing	☐	☒	☒	☐	☒	☐	☐	☐	There would be no significant adverse impact to the distribution and density of population and housing The proposed project constitutes development of overflow parking to alleviate congestion and conflict associated with use of the existing FAS. Alleviating issues associated with use of the existing FAS may

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
									result in higher use of the FAS and an associated increase in demands for local services. Increased demands for services could result in increased need for local employment, which may increase local housing needs. Because the proposed project area is already experiencing a high level of increased use, any increase in employment and associated housing necessary to accommodate higher use of the FAS would be limited. Therefore, any impacts would be short-term and negligible and long-term and negligible.
Demands for government services	☐	☐	☒	☐	☐	☒	☐	☐	There would be no significant adverse impacts on the demands for government services from the proposed project. The development of an additional parking area would result in a need for governmental services in the following areas: Lewis and Clark County Sherriff's office and FWP Law Enforcement presence to patrol and respond to calls initiated from the site may increase slightly due to the area being opened for public use. EMS and Fire response to calls initiated from the site may increase as there will be a greater concentration of the public using the proposed parking area. Noxious weed control services and latrine pumping services will occur on an annual basis or as needed. There would be demands for FWP Parks and Outdoor Recreation Division staff to maintain and monitor the site for changing, unsafe, or undesirable conditions, including, but not limited to, cleaning the latrine, cleaning up litter, maintaining signs,

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
									fixing barriers or concrete parking curbs, maintaining boundary fences, controlling weeds, and communicating and answering questions from visitors. Maintenance staff currently drive from Helena to maintain the existing Craig FAS. After project completion, affected staff would include the proposed parking area into their existing maintenance responsibilities. Therefore, any impacts to government services would be long-term, consistent with existing impacts, and minor.
Industrial, agricultural, and commercial activity	☒	☐	☐	☒	☐	☐	☐	☐	No significant adverse impacts to industrial, agricultural, and commercial activity would be expected because of the proposed project. The proposed project area is currently privately owned and is not used for the purposes of industrial, agricultural, or commercial activity. Therefore, no impacts would be expected because of the proposed project area.
Locally adopted environmental plans and goals	☐	☐	☒	☐	☐	☒	☐	☐	No significant adverse impacts to locally adopted environmental plans and goals would be expected because of the proposed project. The proposed project is compatible with the Lewis and Clark County Growth Policy and with the recreational planning priorities of both Craig and the nearby town of Wolf Creek. FWP is unaware of any other locally adopted plans and goals that may be impacted by the proposed project. Therefore, any impacts would be long-term, beneficial, and minor.
Other appropriate social and	☒	☐	☐	☒	☐	☐	☐	☐	No significant adverse impacts to any other appropriate social and economic circumstances

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
economic circumstances									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 additional social and economic impacts would be expected because of the proposed project.

Figure 9: Based on the design of the proposed parking lot, anticipated traffic and pedestrian flow between the existing Craig FAS and the proposed parking is illustrated. Aerial map of Craig, MT January 5, 2023.

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

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. 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.	
Criteria Used to Determine Significance	
1	The **severity, duration, geographic extent,** and **frequency** of the occurrence of the impact **"Severity"** describes the density of the potential impact, while **"extent"** describes the area where the impact will likely occur, e.g., a project may 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. **"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).
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

VIII. 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 for this EA (Taking and Damaging)

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	☒	☐
Does the action result in either a permanent or an indefinite physical occupation of private property?	2	☐	☒
Does the action deprive the owner of all economically viable uses of the property?	3	☐	☒
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	☐	☒
Is there a reasonable, specific connection between the government requirement and legitimate state interest?	4a	☐	☐
Is the government requirement roughly proportional to the impact of the proposed use of the property?	4b	☐	☐
Does the action deny a fundamental attribute of ownership?	5	☐	☒
Does the action have a severe impact of the value of the property?	6	☐	☒
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	☒	☐
Is the impact of government action direct, peculiar, and significant?	7a	☐	☒
Has the government action resulted in the property becoming practically inaccessible, waterlogged, or flooded?	7b	☐	☒
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	☐	☒
Does the proposed action result in taking or damaging implications?		☐	☒
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.

IX. 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 would result in limited environmental impact, and minimal public interest has been expressed, FWP determines the following public notice strategy will provide an appropriate level of public review:

- This EA is a public document and may be inspected upon request. Any person may obtain a copy of the 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/aboutfwp/public-comment-opportunities*
- 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 EA to those persons for review and comment (ARM 12.2.433(3)).
- FWP will issue public notice in the following newspaper periodical(s) on the date(s) indicated.

Newspaper / Periodical	Date(s) Public Notice Issued
Great Falls Tribune	5/5/23
Helena Independent Record	5/5/23

- Public notice will announce the availability of the EA, summarize its content, and solicit public comment.
- FWP will conduct one (1) public hearing to provide information about the proposed project. The hearing details are as follows:
    - Location: Craig, Montana Fire Hall
    - Date: May 4th, 2023
    - Time: 6:00pm

- **Duration of Public Comment Period:** The public comment period begins on the date of publication of legal notice in area newspapers (see above). Written or e-mailed comments will be accepted until 5:00 p.m., MST, on the last day of public comment, as listed below:
    - **Length of Public Comment Period:** 15 days
    - **Public Comment Period Begins**: May 5th, 2023
    - **Public Comment Period Ends**: May 19th, 2023

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

  Attention: Cannon Colegrove

  Email: cannon.colegrove@mt.gov

  Mailing Address:

  Cannon Colegrove
  Attn: Craig FAS
  4600 Giant Springs Rd.
  Great Falls, MT 59405

X. Recommendation for Further Environmental Analysis

NO further analysis is needed for the proposed action	☒
FWP must conduct **EIS** level review for the proposed action	☐

XI. EA Preparation and Review

	Name	**Title**
EA prepared by:	Cannon Colegrove Jon Staldine Brenna Moloney	Recreation Manager Landscape Architect Heritage Specialist
EA reviewed by:	Charlie Sperry Gary Bertellotti Alex Sholes Nathan Kluz Jason Rhoten Corey Loecker David Holland Eric Merchant	Parks and Outdoor Recreation Asst. Division Administrator Region 4 Supervisor Region 4 Recreation Manager Region 4 Recreation Manager, Acting Region 4 Fisheries Program Manager Region 4 Wildlife Program Manager Region 4 Law Enforcement Captain MEPA Coordinator