MONTANA SAGE GROUSE HABITAT CONSERVATION PROGRAM

2024 ANNUAL REPORT

THIS REPORT COVERS THE PERIOD JANUARY 1 THROUGH DECEMBER 31, 2024

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

INTRODUCTION

The greater sage-grouse (*Centrocercus urophasianus*; hereafter, sage-grouse) is a native species in Montana. While they are found in nine other western states and two Canadian provinces, Montana and Wyoming are the key strongholds for sage-grouse across its range.

Sage-grouse interact with their habitat at a landscape scale and are almost completely dependent on sagebrush for every phase of their life history. Intact, native sagebrush rangeland at a landscape scale is necessary for their survival. Research suggests sage-grouse are particularly sensitive to habitat loss and fragmentation of native sagebrush rangeland caused by cultivation, invasive species, and other anthropogenic development. Sage-grouse population declines have been attributed to these changes in habitat at both local and landscape scales.

In 2010, in response to a petition for protection under the Endangered Species Act (ESA), the United States Fish and Wildlife Service (USFWS) found that listing sage-grouse range-wide was "warranted but precluded" by other higher-priority actions. In 2015, as a result of a comprehensive stakeholder process and the work of Governor Bullock's Greater Sage Grouse Conservation Advisory Council, the Montana Legislature passed the Greater Sage-Grouse Stewardship Act (hereafter, Stewardship Act).

The Stewardship Act accomplished several important things in demonstrating Montana's commitment to implementing a comprehensive conservation strategy: the Montana Sage Grouse Conservation Strategy (hereafter, Conservation Strategy). The Stewardship Act: 1) created the Montana Sage Grouse Oversight Team (MSGOT); 2) created the Sage Grouse Stewardship Account (hereafter, Stewardship Account); 3) appropriated $10 million for the Stewardship Account to fund conservation grants and provided statutory guidance for how the funds could be spent; 4) established that impacts to sage-grouse habitat would be mitigated and provided key statutory guidance; and 5) delegated rulemaking authority to MSGOT. Separately, the 2015 Legislature also appropriated funds to implement the Stewardship Act and Conservation Strategy through MSGOT and created the Montana Sage Grouse Habitat Conservation Program (hereafter, Program).

The Program is guided by Executive Order 12-2015 (EO 12-2015; hereafter, EO). The EO guides where and how development and other activities occur in designated sage-grouse habitat. Certain limitations, stipulations, or conditions may apply, depending on the type of project or activity and its associated location and duration on the landscape. Other components establish general practices that apply to everyone. The EO applies to all programs and activities of state government, including permitting, grant programs, and technical assistance. Through a consultation process, the Program works with project proponents to first avoid impacts, then minimize remaining impacts, and finally, restore impacted areas. Compensatory mitigation may be required for residual temporal or spatial impacts that remain after avoidance, minimization, and restoration measures are implemented.

The Program provides numerous interim reports and briefings to MSGOT and the public throughout each calendar year. A formal written report is produced annually and based on the calendar year (i.e., Annual Report). The 2024 Annual Report covers the period from January 1 to

December 31, 2024. Additional information on the Program and background information about the Conservation Strategy can be found at www.sagegrouse.mt.gov.

SUMMARY OF 2024 PROGRAM ACTIVITIES

Project Consultations

Development Projects

In 2024, the Program received a total of 303 consultation requests for development activities. These included 20 projects for which work was carried over from previous years (2021: 1 project; 2022: four projects; 2023: 15 projects). At the conclusion of 2024, the Program completed reviews for 237 projects (78%). Of the remaining 66 projects, 25 projects were withdrawn, and 41 projects were carried forward for further review into 2025. The majority of projects reviewed by the Program in 2024 were proposed in General Habitat (n = 171 projects; 72%) compared to 27% of projects proposed in Core Areas (n = 65 projects) and <1% of projects proposed in Connectivity Areas (n = 1 project).

Conservation Projects

In 2024, the Program received a total of 21 consultation requests for conservation activities. Of these, nine projects were Permittee-Responsible Mitigation (hereafter, PRM) projects, and 12 projects were located in sage-grouse habitat, but their primary purpose was not for sage-grouse conservation.

Synthesis of 2024 Mitigation Outcomes

At the end of 2024, Montana achieved its goal of balancing conservation with development on a statewide basis. Further, as of December 31, 2024, there was a surplus of credits in the Central and Southwestern Service Areas and a deficit of credits in the North Central and Southeastern Service Areas. Compiled data for all years can be found in the *Synthesis of Mitigation System Key Metrics for All Years* section where we report a summary of all debit and credit transactions accounted for through the Stewardship Account (**Table 9**).

The balance of debits and credits reported in **Table 9** represents a snapshot in time as of December 31, 2024. However, Montana's Mitigation System incorporates time. Debits or credits are calculated for the life of a project, which means not all debits and credits are actively on the landscape simultaneously. Impacts from development projects often fluctuate over time where the majority of impacts occur in the first couple of years while the project is constructed followed by less impacts during the operation and reclamation timeframes. Therefore, the annual balance of credits and debits fluctuates greatly. Due to this fluctuation, the balance of credits and debits reported in **Table 9** are combined to cover all years for the purposes of this report.

Efforts to Improve Implementation

The Program routinely coordinates with state permitting agencies and stakeholders to identify areas of concern and to cooperatively develop solutions for continuous improvement. A pragmatic,

collaborative problem-solving approach has been taken, alongside MSGOT, the Montana Legislature, state and federal agencies, and stakeholders, including private landowners and other interested organizations and parties when issues are identified.

MSGOT hosted a second listening session in October 2024 seeking stakeholder input on ways to improve the Program. Participants provided positive input and were supportive of the Program.

Program Website Improvements

The Program continued to implement upgrades to the website throughout 2024. The Program contracts with a third party to maintain the Program database and website. This includes making regular upgrades to the website, adding efficiencies and addressing issues for external and internal users. These upgrades were based off feedback from website users and stakeholders. While some of these changes were minor (added help text, improved workflow, bug fixes), the major upgrades included:

- Updated the HQT Basemap displayed on relevant web maps.
- Updated existing disturbances data displayed on relevant web maps.

HQT Basemap

The Program worked with an independent contractor to 1) continue ongoing efforts for updating the existing disturbances data layer and 2) validate proposed project data submitted by developers and determine implementation status using the most recent aerial imagery from the National Agriculture Imagery Program (NAIP) and other data sources.

Throughout 2024, Program staff continued to identify and update individual spatial data layers within the HQT Basemap with the most recently available data from the same publicly available data sources used to create the 2024 HQT Basemap (v1.1). It is anticipated that the next version of the HQT Basemap will be released in 2026.

Montana Sage Grouse Habitat Conservation Program Background

Overview of the Program Review Process for Development Projects

The EO requires the Program to review all proposed activities in sage-grouse habitat designated as Core Area, General Habitat, or Connectivity Area that require a state permit or authorization or utilizes state funds. The EO also applies to work undertaken by state agencies.[1] If the proposed activity will take place outside of sage-grouse designated habitat, a Program review (or consultation) is not required. MSGOT has granted certain limited exemptions from Program review[2].

Through the consultation (e.g., review) process, the Program works with project proponents before they submit applications for state permits, authorizations, or grant funds. The primary goal of consultation is to avoid or minimize project impacts to sage-grouse habitat through careful project siting (i.e., location), design (e.g., buried power lines are less impactful than overhead power lines),

[1] See EO 12-2015 Attachment D.
[2] See EO 12-2015 Attachment F.

timing, and duration of construction and operations. Avoiding or minimizing impacts enables projects to be consistent with the requirements of the EO.

Completion of a Program review is required prior to initiating a state permitting process (**Figure 1**). State permitting programs require a Program review be provided at the time permit applications are submitted, if applicable. If a Program review is not provided but required, permitting programs will refer the applicant to the Program prior to proceeding with the permitting process.

The Program undertakes a review for consistency with the requirements of the EO. If the proposed activity is not consistent with the EO, the Program will work with the proponent to determine the best solutions to both achieve consistency with the EO and to facilitate permitting of the proposed activity. Additionally, the Program works with proponents to determine what, if any, mitigation is required to offset the impacts of the development project.

Once the Program review has been completed, a consultation letter and mitigation plan, if applicable, are produced. A PDF copy of the consultation letter and mitigation plan is attached to the project record and is available through the proponent's project link in the Program's web application.

The proponent then attaches the documentation to the permit application submitted to the relevant state permitting agencies. The state agencies include the Program's recommendations as stipulations on the permit. The Program works closely with the various state agencies, their permitting programs, and their respective stakeholder groups to identify and resolve issues as well as identifying opportunities for increased efficiency.

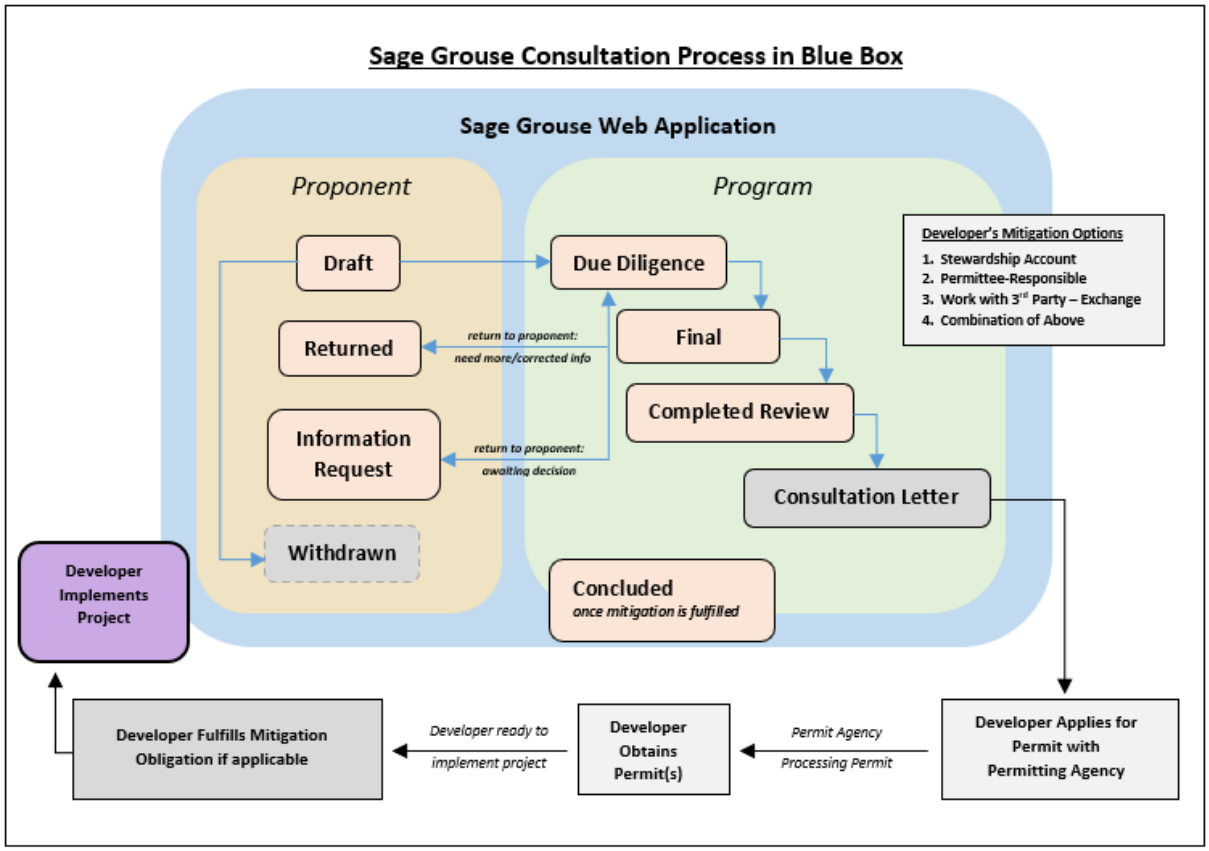

Figure 1. Overview of the Program's review process. Developer activities are shown under Developer in the yellow box and Program activities are shown in the green box. A project may be moved between stages.

Program Review Life Cycle for Projects in the Web Application

The Program strives to review proposed development projects in a timely, efficient manner. In doing so, the Program facilitates the State's permitting process to move development projects forward to implementation.

Project proponents initiate the consultation process by providing information through the Program's website. The website provides an orderly, consistent workflow for proponents to efficiently provide information pertinent to their project and for the Program to receive and process consultation requests. Information provided to the Program is kept secure and is not sold or disseminated. Each submission is assigned a unique identification number that is used to track the project through the review process. The project proponent receives automated emails verifying that the information was received by the Program, if the project has been returned to the proponent seeking additional information (if necessary), and when the review has been completed by the Program.

If the proposed project is not in designated sage-grouse habitat, the website notifies the proponent immediately and refers the proponent directly to the permitting agency, because a Program review is not required.

Once a proponent logs into the website and initiates the consultation process, the project advances through individual stages of review (**Figure 1**). When a proponent starts a new project on the website, it is in the *Draft* stage. The *Draft* stage provides proponents with opportunities to proactively design and site projects to avoid designated habitat altogether, when possible, avoid sensitive areas near leks, and consider other ways to minimize impacts. Once started, projects are saved in the *Draft* stage, and proponents can access and work on their projects anytime.

When a proponent is ready to submit their project and does so, the project advances to the *Due Diligence* stage and the Program can then begin the review process. If the Program determines that changes need to be made to the project submission in order to complete the review, the Program will *Return* the project to the proponent so that the necessary adjustments can be made. A project may be moved to *Information Request* when the Program is waiting for the proponent to make a decision involving offsetting mitigation outcomes, awaiting federal agency outcomes of National Environmental Policy Act (NEPA) analysis, or similar informational needs.

Once the project is resubmitted, the project is in the *Due Diligence* stage again. The Program once again starts reviewing the project. A project may move between one or more of these stages multiple times before the Program has all the necessary information to continue and complete the review process. The Program works diligently with proponents to gather necessary information as effectively and efficiently as possible.

When Program staff have completed all the technical work and coordination with proponents, Program staff move the project to *Final Review*. At this point, Program staff and the Program Manager review all the technical work, conclusions, and recommendations. Errors or omissions can be addressed at this time, if any. Once the Program Manager gives final approval, the project advances to *Completed Review*. *Completed Review* signifies the completion of the Program review under the EO, and the Program provides the proponent with a consultation letter and mitigation plan, if applicable. If the outcome of a project did not result in a mitigation obligation, it will then be advanced to *Concluded*. Otherwise, projects will remain in the *Completed Review* stage until the mitigation obligation has been fulfilled. As soon as mitigation obligations are fulfilled, the project advances to *Concluded.*

As part of reaching the *Completed Review* stage, Program staff upload final consultation documents (e.g., consultation letter, mitigation plan) to a proponent's project folder on the Program's website. Proponents can access the final documentation from the website and download documents, as desired. The project and all its related documentation are stored securely in the Program's database and can be accessed at a future date, if needed. The review process is then finished, and the review life cycle is completed. Proponents are also able to withdraw their own projects at any time and for any reason. Proponents do not have to provide advanced notice or a justification for withdrawing their own projects. Withdrawing effectively removes the project from the Program's review process. Withdrawing of a project by a proponent does not signify a denial of consultation or a rejection of the project by the Program. It simply means that a proponent has taken the step to withdraw a request for consultation on their own initiative. However, all project information remains securely stored in an inactive state, and a proponent can re-activate a withdrawn project at any time by contacting the Program.

Project Type Categories and Disturbance Types

Every development project submitted to the Program is described first with a Project Type and secondly defined further with individual disturbances (i.e., Disturbance Types) associated with the project (**Table 1**). The Project Type describes the primary purpose of the project. The Disturbance Type reflects individual disturbance features that are typically associated with any given Project Type. For example, the Energy-Wind Project Type entails construction of a new wind facility and individual disturbances necessary to construct a new wind facility may include several Disturbance Types such as turbines, roads, electrical lines, and a substation.

Table 1. List of Project Types and their associated Disturbance Types available to developers through the Program's website.

Project Type	Associated Disturbance Types
Agriculture - Land	Building, Crop, Grazing, Livestock Area, Power Line, Road
Agriculture - Water	Bore Hole, Building, Irrigation, Pipeline, Power Line, Reservoir, Road, Soil Storage Pile, Stock Pond, Stock Tank, Water Diversion, Water Right Change/Clerical, Water Supply Well
Energy - Geothermal	Building, Facility Boundary, Pipeline, Power Line, Power Plant, Road, Storage Yard, Substation, Trench, Water Supply Well
Energy - Hydroelectric	Building, Facility Boundary, Maintenance Activities, Pipeline, Pond, Power Line, Power Plant, Road, Spillway, Storage Yard, Substation, Trench
Energy - Nuclear	Building, Facility Boundary, Pipeline, Pond, Power Line, Power Plant, Road, Storage Yard, Substation, Trench
Energy - Oil Shale	Building, Facility Boundary, Open Pit, Pipeline, Pond, Power Line, Processing Facility, Railroad, Road, Storage Yard, Well Pad
Energy - Oil/Gas	Building, Central Battery System, Collection Facility, Compressor, Field Boundary, Gas/Oil Well, Maintenance Activities, Monitoring Well, Pipeline, Plug and Abandon, Pond, Power Line, Power Plant, Railroad, Road, Soil Storage Pile, Storage Yard, Temporary Abandonment, Underground Storage Tank, Water Supply Well, Well Pad
Energy - Seismic	Buggy Lines, Cultural Survey, Facility Boundary, Road, Seismic Shot Hole/Probe Route, Storage Yard
Energy - Solar	Building, Facility Boundary, Field, Pipeline, Power Line, Power Plant, Road, Storage Yard, Substation, Water Supply Well
Energy - Tar Sands	Building, Facility Boundary, Gravel Pit, Pipeline, Pond, Power Line, Processing Facility, Railroad, Road, Storage Tank, Storage Yard
Energy - Wind	Building, Cable, Facility Boundary, Met Tower, Pipeline, Power Line, Power Plant, Road, Storage Yard, Substation, Trench, Turbine Pad
Forestry	Culvert, Firebreak/Dozer Line, Road, Timber Harvest
Habitat Treatment	Fire, Mechanical, Restoration
Infrastructure - Communication	Bore Hole, Building, Facility Boundary, Guy Wire, Met Tower, New Cable Route, Power Line, Replacement Cable Route, Road, Storage Yard, Tower Pad
Infrastructure - Industrial/Commercial	Building, Drone Path, Facility Boundary, Gravel Pit, Landfarm, Landfill, Laydown Yard, Parking Area, Pipeline, Pond, Power Line, Road, Septic/Sewer, Storage Yard, Stormwater, Underground Storage Tank, Water/Soil Sample, Water Supply Well, Water System
Infrastructure - Military	Base, Building, Gravel Pit, Parking Area, Pipeline, Power Line, Range, Road, Storage Yard, Water Supply Well
Infrastructure - Pipeline (Major)	Bore Hole, Building, Compressor, Facility Boundary, Laydown Yard, Pigging Facility / Launcher, Pipeline, Pond, Power Line, Road, Soil Storage Pile, Storage Yard, Trench, Water Supply Well
Infrastructure - Recreation	Building, Cable, Campground, Motorized/OHV Road, Motorized/OHV Trail, Park, Parking Area, Pipeline, Pond, Power Line, Septic/Sewer, Soil Storage Pile, Water Supply Well
Infrastructure - Residential	Building, Cable, Park, Parking Area, Pipeline, Pond, Power Line, Road, Septic System, Stormwater, Subdivision Area, Water Storage, Water Supply Well
Infrastructure - Transmission Line	Bore Hole, Guy Wire, Laydown Yard, Power Line, Road, Storage Yard, Substation, Tower

Infrastructure - Transportation	Airport Radio Tower, Airport Runway, Blasting, Bore Hole, Borrow Pit, Bridge, Building, CORS Site, Culvert, GeoProbe, Guard Rail, Interstate Highway, Laydown Yard, Parking Area, Pile Driving, Pipeline, Power Line, Railroad Mainline, Railroad Spur, Road, Signage, Spill/Remediation, Storage Yard, Underground Storage Tank
Mining	Building, Core Hole, Gravel Pit, Mine, Monitoring Well, Permit Boundary, Pipeline, Pond, Power Line, Power Plant, Railroad, Road, Shaft, Storage Yard, Stormwater Discharge Outlet Pipe, Trench, Underground Storage Tank, Waste Rock / Tailings / Overburden, Water Supply Well

SUMMARY OF 2024 CONSULTATION ACTIVITIES FOR DEVELOPMENT PROJECTS

The Program website and associated database provides interactive user tools, conducts automated analyses, and serves as a repository for Program review information, respectively. These three main functions yield the secured data the Program uses to create this report. These data were analyzed to create two unique summaries:

1. general metrics about the Program's consultation activities; and

2. specific metrics about development projects attaining *Completed Review* or *Concluded* by December 31, 2024.

General metrics about the Program's consultation activities provide insights into the review process, Program performance, and generalized locations of proposed development projects. Specific metrics about projects in either *Completed Review* or *Concluded* provide insights into the type and general location of potential future development within designated sage-grouse habitat. For this annual report, the Program has filtered the data to report only on 2024 data to maintain consistency and replicability with previously published annual reports.

It should be noted that the data included in this report are strictly for proposed projects, not implemented projects. It is likely that many of the projects reviewed are implemented within a short time frame of completing the consultation process. However, there are no existing mechanisms in place for the Program to monitor implementation status of proposed projects, as permit issuance and project implementation occur completely outside of the established review process for the Program.

This disparity in time introduces unique nuances to data presentation in this report, where the data for such proposed projects may serve as an index for future disturbance on the landscape in sage-grouse habitat. Reported data for proposed projects should not be understood as disturbances currently on the landscape.

Data Preparation Methods

Information reported is derived using the SG 5.3.1 database. Specific queries will either include or filter out specific data or projects according to the metric of interest.

One of the first filters set on the data is the exclusion of projects in *Draft*. As described above, *Draft* is a virtual sandbox made available to project proponents and is not actively under Program review. As the information is stored in the SG 5.3.1 database, the Program excludes *Draft* projects and

associated activities because the Program review process has not been initiated by the project proponent at this point.

The review stages included in the filtered dataset for this report include *Due Diligence*, *Information Request*, *Final Review*, *Completed Review/Concluded*, *Returned*, and *Withdrawn* (**Figure 1**). The web application tracks the date/time stamp for review stage transitions. Program performance metrics are based on calculating the number of days a project spends in each review stage using these date/time stamps.

Other filters applied to the dataset include restricting the dataset to projects meeting specific ranges of submission dates (*Due Diligence*) and completion dates (*Completed Review*). This allows for the identification of projects that are in an active review stage (e.g., *Due Diligence*, *Final Review*) during 2024. The 2024 annual reporting period includes projects that were submitted for review in 2022, 2023, or 2024 and completed in 2024.

Lastly, each major Project Type may have more than one associated individual Disturbance Type. The section on *Specific Metrics: Development Projects Reviewed in 2024* are based on projects which attained a *Completed Review* stage, meaning the Program completed its review and provided written documentation to proponents.

General Metrics: Consultations and Program Performance

In 2024, there were 303 development projects in designated sage-grouse habitat requiring Program consultation (**Figure 2**). Twenty of the 303 projects were originally submitted for review prior to 2024: one project in 2021, four projects in 2022 and 15 projects in 2023. The remaining 283 projects were submitted in 2024.

Of the 303 projects the Program worked on in 2024, the Program completed reviews for 237 projects (78%; **Figure 2**). Of the remaining 66 projects, the Program continued reviews for 41 proposed projects (14%) into 2025 because additional information was necessary to complete the review (i.e., *Information Request*, *Returned*) and 25 projects (8%) were withdrawn by the developer.

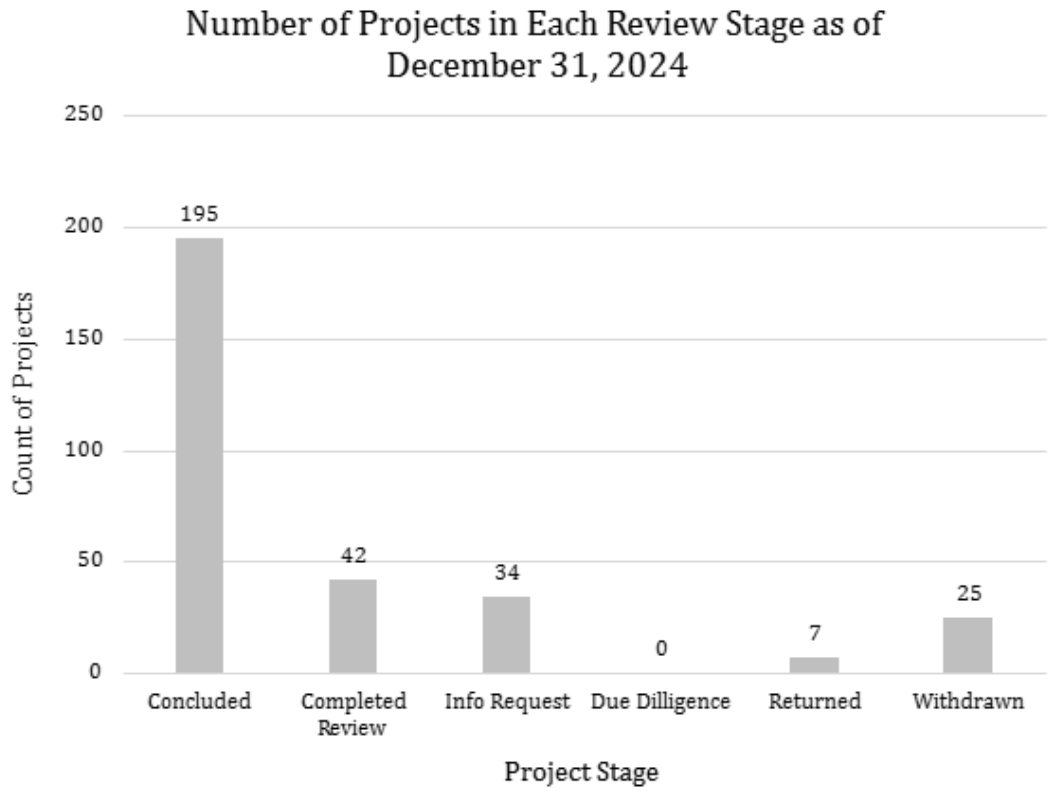

Figure 2. In 2024, the Program received a total of 283 new requests to review proposed development projects, and continued review on an additional 20 projects from either 2021, 2022, or 2023. As of December 31, 2024, the Program completed reviews for 237 projects with the remaining 66 projects in either *Returned* or *Information Request* (developer is gathering the additional information need for the Program to complete a review) or *Withdrawn* (developer withdrawn the project on their own accord and for their own reasons).

Project Review Status by EO Designated Habitat

Of the 303 projects reviewed by the Program in 2024, 71% were located in General Habitat (n = 215 projects), 28% were located in a Core Area (n = 65 projects), and <1% were located in a Connectivity Area (n = 1 project; **Figure 3**).

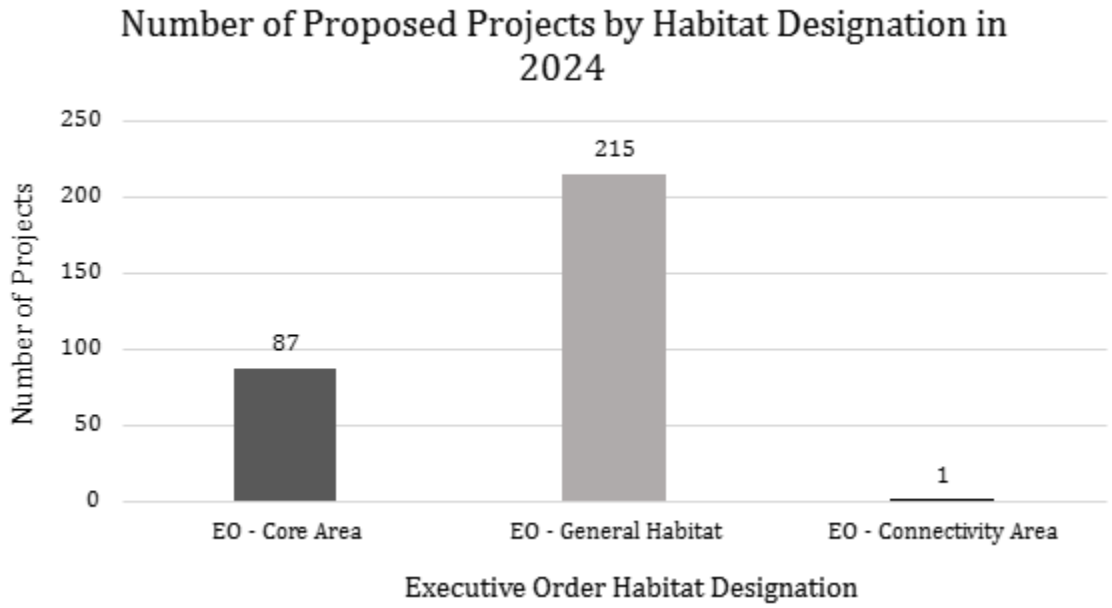

Figure 3. Of the 303 projects reviewed by the Program in 2024, 215 projects were located in General Habitat, 87 projects were located in a Core Area, and one project was located in a Connectivity Area.

Review Process Timeline

The Program tracks the review time for each proposed development project once submitted to the Program for review. For purposes of this report, the Active Review Time for a given proposed project is comprised of the number of days the project spends in *Due Diligence* and *Final Review* with the clock stopping once the project transitions to *Completed Review*. Some proposed projects enter the *Returned* or *Information Request* stages, allowing Proponents to submit additional information about their proposed project deemed necessary for the Program to complete the review. The Program tracks the time spent in the *Returned* and *Information Request* stages separately from the Active Review Time.

Of the 303 total projects reviewed by the Program in 2024, 237 projects reached the *Completed Review* or *Concluded* stage by December 31, 2024 (**Figure 4**).

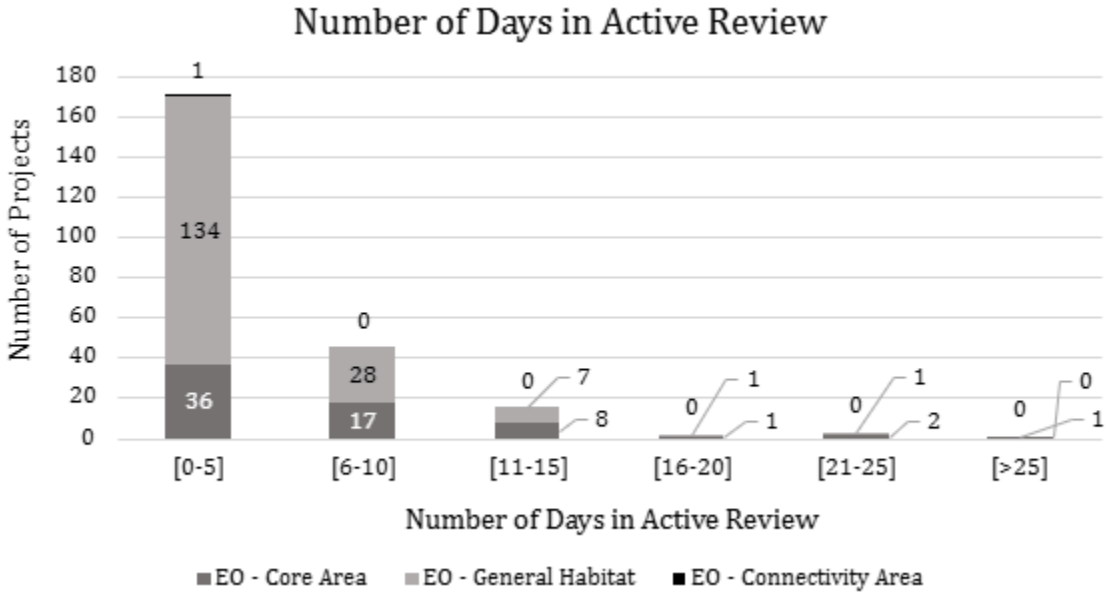

Figure 4. The number of projects that reached *Completed Review* or *Concluded* that were either submitted to the Program for review in 2024 (n = 221 projects) or for which review carried over from previous years (n = 16 projects) in all designated sage-grouse habitat according to the number of days those projects spent in an active review status (i.e., *Due Diligence, Final Review*). The Program completed reviews for a total of 237 projects in 2024.

Specific Metrics: Development Projects Reviewed in 2024

This section presents a more detailed consideration of projects for which reviews were completed in 2024. The following discussion focuses on specific categories of Project Types as submitted for Program review. All the projects reported in this section attained *Completed Review* or *Concluded* and received written documentation (e.g., consultation letter, mitigation plan) from the Program by the end of 2024. It also includes projects that were originally submitted for review in previous years and carried forward to be completed (i.e., *Completed Review*) or *Concluded* in 2024.

Project Information by Project Type

The Project Types explicitly discussed in this section represent some of the most common Project Types for which the Program conducted reviews in 2024. These Project Types include 54 Transportation projects, 19 Agriculture – Water projects, 27 Communication projects, 43 Mining projects, and 56 Residential projects (**Figure 5**).

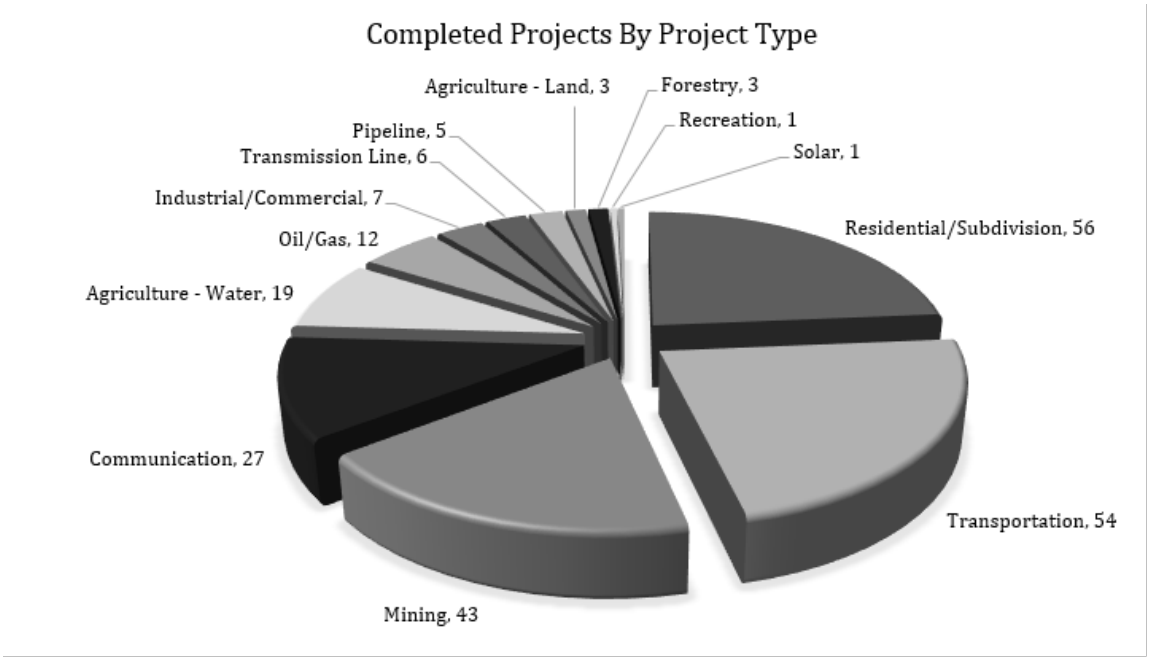

Figure 5. The number of all projects by Project Type for which the Program completed a review in 2024 (n = 237 projects).

Infrastructure – Residential

During 2024, the Program completed reviews for 56 proposed Infrastructure – Residential projects (**Figure 5**). Approximately 82% of the proposed Residential projects were located in General Habitat (n = 46 projects) and 18% were located in a Core Area (n = 10 projects).

Residential projects may encompass a variety of proposed infrastructure and activities necessary for project implementation. Some common infrastructure (i.e., Disturbance Types) associated with Residential projects include Buildings, Cables, Parks, Parking Areas, Pipelines, Ponds, Power Lines, Roads, Septic Systems, Stormwater, Subdivision Areas, Water Storage, and Water Supply Wells (**Table 1**).

Infrastructure – Transportation

During 2024, the Program completed reviews for 54 proposed Infrastructure – Transportation projects (**Figure 5**). Approximately 74% of the proposed Transportation projects were located in General Habitat (n = 40 projects), 24% were located in a Core Area (n = 13 projects), and 2% were located in Connectivity Area (n = 1 project).

Transportation projects may encompass a variety of proposed infrastructure and activities necessary for project implementation. Associated infrastructure may include Airport Radio Towers, Airport Runways, Borrow Pits, Bridges, Buildings, Culverts, Interstate Highways, Parking Areas, Pipelines, Railroad Mainlines, Railroad Spurs, Roads, and Storage Yards (**Table 1**).

Mining

During 2024, the Program completed reviews for 43 proposed Mining projects (**Figure 5**). Approximately 74% of the proposed Mining projects were located in General Habitat (n = 32 projects) and approximately 26% were located a Core Area (n = 11 projects). Therefore, of the Mining projects proposed in sage-grouse habitat, most were located in General Habitat, thereby avoiding some of the highest quality sage-grouse habitat in Core Areas.

Mining projects may encompass a variety of proposed infrastructure necessary for project implementation, such as Buildings, Core Holes, Fences, Gravel Pits, Mines, Monitoring Wells, Pipelines, Ponds, Power Lines, Power Plants, Railroads, Roads, Shafts, Storage Yards, Stormwater Discharge Outlet Pipes, Trenches, Waste Rock / Tailings / Overburden, and Water Wells (**Table 1**). The majority of the proposed Mining Projects included Core Holes, Access Roads, Trenches, and Gravel Pits.

Infrastructure – Communication

During 2024, the Program completed reviews for 27 proposed Infrastructure – Communication projects. Approximately 70% of proposed Communication projects were located in General Habitat (n = 19 projects) and approximately 30% were located in a Core Area (n = 8 projects).

Communication projects may encompass a variety of proposed infrastructure and activities necessary for project implementation. Some common infrastructure (i.e., Disturbance Types) associated with Communication projects include Bore Holes, Buildings, Facility Boundaries, Guy Wires, Met Towers, New Cable Routes, Power Lines, Replacement Cable Routes, Roads, Storage Yards, and Tower Pads (**Table 1**). The majority of the proposed Communications projects were fiber optic cable routes and communication towers.

Agriculture – Water

During 2024, the Program completed reviews for 19 proposed Agriculture – Water projects (**Figure 5**). Approximately 63% of the proposed Agriculture – Water projects were located in General Habitat (n = 12 projects) and 37% were located in a Core Area (n = 7 projects).

Agriculture – Water projects may encompass a variety of proposed infrastructure and/or activities necessary for project implementation. Some common infrastructure (i.e., Disturbance Types) associated with Agriculture – Water projects may include Irrigation, Stock Ponds, Stock Tanks, Pipelines, Water Diversions, Water Wells, Power Lines, and Buildings (**Table 1**). Most of the proposed Agriculture – Water projects included Pipelines (e.g., water pipelines), Irrigation, and Stock Tanks.

Development Project Impacts in Sage-Grouse Habitat

Introduction and Context

Working in concert, the Stewardship Act, the EO, and the Montana Mitigation System balance the competing needs of conservation and economic activity/development in designated sage-grouse habitat. All new land uses or activities that are subject to state agency review, approval, or

authorization are required to avoid, minimize, and reclaim impacts to sage-grouse habitat, and to provide compensatory mitigation for any residual effects. The State also provides technical support to Bureau of Land Management (BLM) and United States Forest Service (USFS) when those agencies are reviewing permit or authorization requests to use or develop public lands.

While there are several Project Types that require consultation and are subject to mitigation, Attachment F of the EO provides a list of activities that are exempt from these requirements under certain circumstances. Additionally, MSGOT may approve exceptions to the consultation requirements of the EO on a case-by-case basis (e.g., activities requiring permits that would wholly occur within the boundaries of an incorporated municipality).

There are two additional circumstances where the resulting impact due to the implementation of a development project does not require mitigation. First, there are instances where a developer has sited a development project in a location where the HQT mathematical calculation result is zero. This means that the HQT indicates that no functional acres would be lost, no debits accrued, and no mitigation obligation required for the project. This is an instance where careful siting has resulted in no impacts from the project to sage-grouse habitat.

Second, there are instances where a development project may produce an HQT result greater than zero, but where the landscape surrounding the proposed project or other *in situ* facts indicate little to no impact on sage-grouse habitat or local sage-grouse populations. In these instances, the Program assesses additional sources of information to further critique the HQT result, including other sources of aerial imagery, other GIS data sources, and local professional opinions and experience. This process is called a Desktop Analysis. This would be undertaken for development projects proposed in areas that are *already* highly fragmented and disturbed to the extent that they generally have little to no habitat value for sage-grouse.

The Program has found that when projects fall into either the first or second set of circumstances, it is usually because the Program is reviewing projects at the site-specific, fine scale whereas designated habitat boundaries were delineated at a broad, more generalized scale. The Program exercises its best professional judgment, guided by the literature, on a project-by-project basis where the broadly delineated habitats do not account for finer, localized aspects of sage-grouse habitat (including physical attributes observed in the field) where impacts from a project may occur.

It is important to note that even when a project falls into any of the above categories (e.g., exempt, zero HQT result, Desktop Analysis) and no mitigation is required of the developer, surface disturbance may still occur. Therefore, the information and data are still tracked and reported below.

Lastly, there is uncertainty around the timing of future implementation for reviewed development projects. The Program does not have a feedback mechanism in place to confirm when a project is implemented. It is known that developers sometimes delay or cancel projects altogether after the Program completes a review of the proposed project. Once the Program has completed a review, the project is moved to *Completed Review* to signify the Program has provided the proponent with the appropriate documentation. It is not until the proponent obtains necessary permits and they

are ready to implement the project that mitigation is required to be fulfilled. Once payment has been received through the Stewardship Account or impacts have been offset through PRM, the project is then moved to *Concluded*. Therefore, the data presented below represents *assumed* impacts on the landscape within designated sage-grouse habitat in Montana using the best available information. The assumption is made that the project will be implemented because developers have, of their own accord, initiated the consultation process with the Program and fulfilled their mitigation obligation. The Program will endeavor to confirm whether development projects were implemented and anticipates refining the data in future reports.

As calculated using the HQT, the sections below summarize functional acres lost for *Concluded* projects, debits accrued through policy and site-specific multipliers for such projects, total debits (functional acres lost + multiplier debits), methods developers selected to fulfill mitigation obligations, and contributions to the Stewardship Account by developers who chose that option.

Functional Acres Lost from Development Activities

Functional acres lost are calculated using the HQT. The HQT is based on standardized data and used to quantify losses of functional habitat using a consistent, quantitative approach. The number of functional acres lost depends on: 1) the project location, 2) the underlying habitat quality both in the direct footprint and indirect impact area, 3) the Project Type, 4) the project size, 5) project complexity, 6) proximity of the project to existing disturbance, and 7) project duration (i.e., how long the project will exist on the landscape).

Data Preparation

The data in this section includes all projects for which an HQT calculation was performed, and for which reached a review stage of *Concluded* in 2024 to estimate the total number of functional acres lost. Even though an HQT calculation is performed, a mitigation obligation for the developer is not guaranteed if the project 1) had an HQT mathematical result of zero functional acres lost (i.e., zero debits) or 2) it qualified for a Desktop Analysis.

This section includes one project that entered *Due Diligence* in 2022 and three projects that entered *Due Diligence* in 2023 and a reached *Concluded* in 2024. The remaining 47 projects entered *Due Diligence* and reached *Concluded* entirely within 2024.

Results: Sum of Functional Acres Lost

Of the 303 projects the Program worked on in 2024, the Program completed reviews for 237 proposed development projects by December 31, 2024. Of those 237 projects, the Program performed HQT calculations for 91 projects (38%). An HQT calculation was not conducted on the remaining 146 projects (e.g., EO exemptions, MSGOT-approved exceptions, projects lacked new surface disturbance). Of the 91 projects for which an HQT was calculated, 51 development projects reached *Concluded* by the end of 2024.

Of the 51 projects for which an HQT was calculated and reached the *Concluded*, 17 projects did not trigger a mitigation requirement: nine projects had a mathematical result of zero (18%) and eight projects resulted in a Desktop Analysis (16%).

In 2024, a total of 69,338 functional acres were lost due to the implementation of 51 development projects across all Service Areas.

Of the 69,338 functional acres lost, 19,021 were attributed to projects with impacts occurring in a Core Area (27%) and 50,317 were attributed to impacts occurring in General Habitat (73%; **Figure 6**). No functional acres were lost in a Connectivity Area.

The greatest loss of functional acres in 2024 occurred in the Southeastern Service Area, totaling 42,427 (61%; **Figure 6**). Approximately 38% of the remaining functional acres lost in 2024 occurred in the Central Service Area (26,670 functional acres lost) and less than 1% each for the North Central Service Area (216 functional acres lost) and for the Southwestern Service Area (25 functional acres lost).

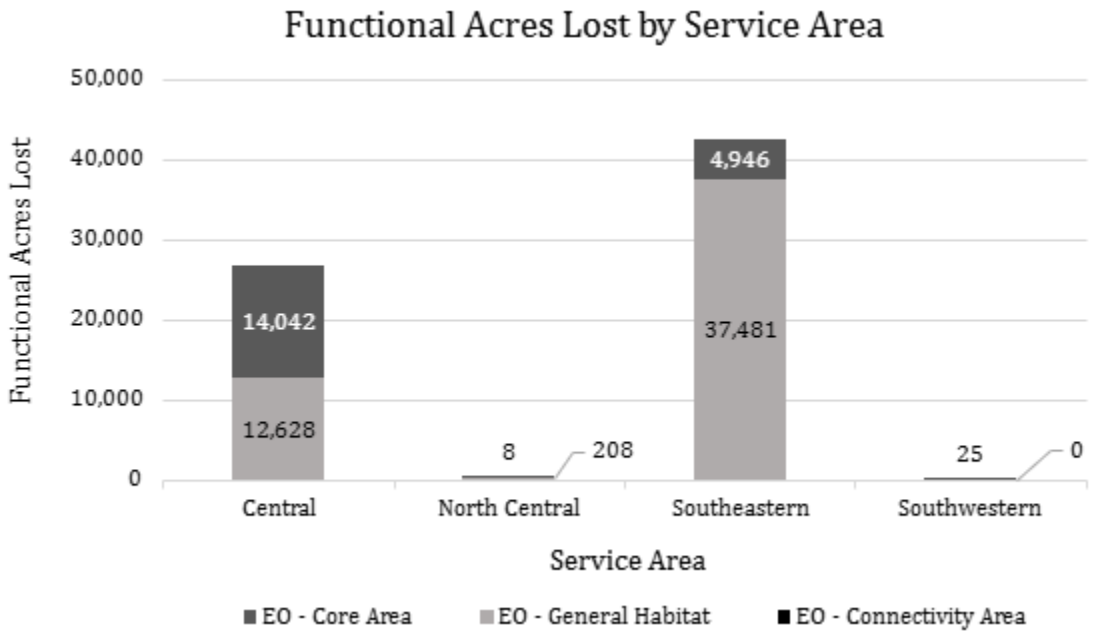

Figure 6. Number of functional acres lost by Service Area and EO habitat designation for all development projects for which an HQT calculation was performed and reached *Concluded* by December 31, 2024 (n = 51 projects).

Policy Multipliers and Site-Specific Multipliers

Multipliers provide clear policy-based incentives to developers to voluntarily implement projects in a manner and at locations that are consistent with the provisions of the EO. More specifically, consistency with the EO conserves habitat and causes the least amount of impact by incentivizing project siting, designs, and implementation that results in the fewest number of functional acres lost as possible.

The total mitigation obligation is determined after applying the following multipliers, as applicable, to each individual development project's Raw HQT Score (i.e., total functional acres lost):

Reserve Account of 20% is applied to the Raw HQT Score for risk and replacement of lost credits and for discretionary MSGOT waivers, as available. The Reserve Account is a shared pool of credits to replace credits lost or impaired through unforeseen events such as wildfire (i.e., unavoidable loss or force majeure or "Acts of God"). Because this risk is shared among all participants in the Mitigation System, it is applied to all development projects.

Advanced Payment of 10% is applied to the Raw HQT Score for projects where the proponent opts to meet their mitigation obligation through a contribution to the Stewardship Account. It is *not* applied to projects mitigated through PRM.

Federal Net Gain of 10% is applied when the project involves a federal nexus. Calculations are based on only the portion of the project's Raw HQT Score having a federal nexus.

Site-Specific Impacts are addressed through a multiplier of 10% for a Core Area or 5% for General Habitat and Connectivity Area for each aspect of a proposed project that is not consistent with the EO stipulations during the construction or operations phases of a project. These site-specific multipliers include Density Disturbance Calculation Tool (DDCT; applied on Core Area only), No Surface Occupancy Areas (NSO's), Seasonal Use, Vegetation Removal, and Noise.

The applicability of site-specific multipliers varies widely from project to project and are always discussed with developers prior to the Program finalizing its review. In some cases, developers voluntarily modify various aspects of their projects (e.g., how and when their projects are implemented) to improve consistency with the EO stipulations and avoid application of site-specific multipliers, thus decreasing their total mitigation obligation. Because multipliers are calculated as a percentage of the Raw HQT Score for the applicable phase of a development project, multipliers also scale proportionately to the same project factors and details that influence the Raw HQT Score. Factors include Project Type, project location, project duration, underlying habitat quality, timing of implementation, etc. The unit of measurement for multipliers is "debits", defined as the unit of trade representing the loss of resource functions or value at an impact or project site.[3]

Data Preparation

The following results are based on the 51 development projects for which an HQT calculation was performed, and for which reached a review stage of *Concluded* by December 31, 2024. This includes projects which qualified for the Desktop Analysis following the HQT calculation.

Policy and Site-Specific multipliers were tallied individually and summarized by Service Area. Totals were also determined at the statewide level.

Results: Sum of Debits Associated with Policy and Site-Specific Multipliers

On a statewide basis across all Service Areas, a total of 26,843 debits were attributed to the combination of policy and site-specific multipliers applied for all 51 projects (**Table 2**). A total of

[3] MCA § 87-5-903 (5) (2022).

13,867 debits were attributed to the Reserve Account multiplier and a total of 6,880 debits were attributed to the Advanced Payment multiplier (**Table 2**).

Statewide, less than 1% of the total multiplier debits were attributed to the BLM requirement for Net Conservation Gain multiplier (i.e., Federal Net Gain; n = 45 debits; **Table 2**).

A total of 9,096 debits were attributed to site-specific multipliers. The Seasonal Use multiplier being the most common deviation of any stipulation in the EO. The Seasonal Use multiplier is applied to impacts from projects being implemented/constructed and operational between March 15 – July 15 within specified distances of active sage-grouse leks (areas derived from such distances and the defined timeframe represent the breeding, nesting, and early brood-rearing period and area for sage-grouse). Among all 51 projects, 87% of the total site-specific multiplier debits were attributed to the application of the Seasonal Use multiplier (n = 5,313 debits; **Table 2**).

Table 2. The number of debits attributed to policy and site-specific multipliers for projects which reached *Concluded* by December 31, 2024.

Multiplier	**Service Areas**				**Statewide**
	Central	North Central	Southeastern	Southwestern	
Reserve Account	5,335	42	8,485	5	13,867
Advanced Payment	2,665	22	4,191	2	6,880
Federal Net Gain	37	0	6	2	45
DDCT	725	0	5	0	730
NSO	0	0	0	0	0
Seasonal Use	2,643	13	2,657	0	5,313
Vegetation Removal	8	0	0	0	8
Noise	0	0	0	0	0
Oil/Gas 1:640	0	0	0	0	0
Total Multipliers by Service Area	**11,413**	**77**	**15,344**	**9**	**26,843**

Total Debits

Data Preparation

The following results are based on the 51 development projects for which an HQT calculation was performed, and for which reached *Concluded* by December 31, 2024.

The total debits summary includes debits attributed to projects which qualified for the Desktop Analysis following the HQT calculation. The total debits summary does not include debits attributed to either the Reserve Account or Advanced Payment multipliers as these debits do not represent realized impacts to sage-grouse habitat.

Total debits were summed for all 51 development projects and reported by Service Area and designated habitat category. Total debits were also analyzed and reported according to the major Project Types (**Table 1**). Note that each project may include one or more of a variety of individual Disturbance Types.

Results: Sum of Total Debits

In 2024, 75,436 debits were created by development projects for which mitigation was applicable and that reached *Concluded* by December 31, 2024 (n = 51 projects). The total number of debits reflects the total number of functional acres lost plus all debits accrued through applicable multipliers[4].

The total number of debits attributed to projects within each Service Area was highly variable. The number of debits accrued in each Service Area in relation to the number of projects located in each Service Area is not a linear relationship. Rather, the number of debits generally corresponds with spatial extent and complexity of the development projects and the underlying habitat quality at the project's location. More total debits would be expected in Service Areas having projects with larger total impacts to sage-grouse habitat and at locations where the underlying habitat quality is higher.

A total of 45,095 debits were attributed to projects located in the Southeastern Service Area (60%; n = 7 projects). The remaining 30,341 debits were attributed to projects in the three remaining Service Areas: 30,084 debits in Central (n = 33 projects), 230 debits in North Central (n = 10 projects), and 27 debits in Southwestern (n = 1 project; **Figure 7**).

Of the 75,436 total debits, 24,756 debits were attributed to projects with impacts occurring in a Core Area (33%) and 50,680 debits were attributed to projects within impacts occurring in General Habitat (67%; **Figure 7**).

[4] Does not include debits attributed to either the Reserve Account or Advanced Payment multipliers.

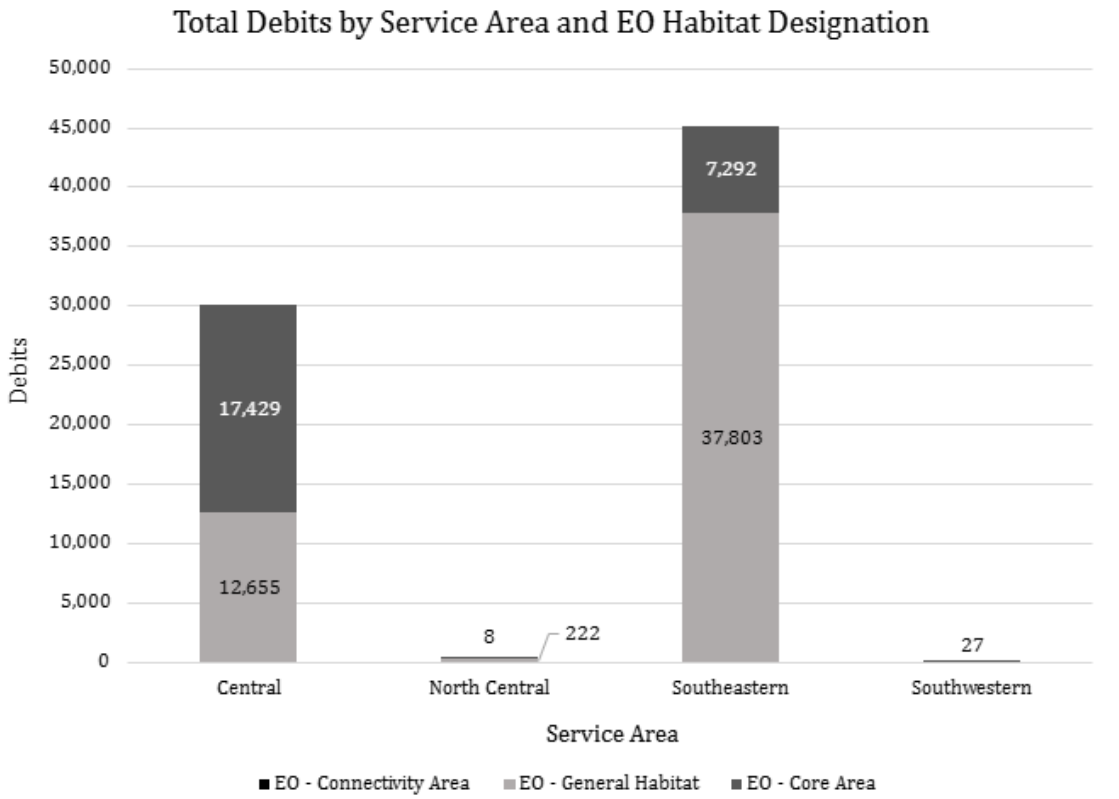

Figure 7. Total number of debits created by Service Area and EO habitat designation for projects for which an HQT was calculated and which reached *Concluded* by December 31, 2024 (n = 51 projects). Totals reflect the functional acres lost due to the project for its entire duration, along with any applicable multipliers[5].

Results: Total Debits Created by Development Project Type

Project Types are listed in **Table 1**. The following summary includes the total debits accrued across all Project Types in 2024. Of the total 75,436 debits accrued in 2024, impacts from Transmission Line projects represented the majority of debits (n = 43,708 debits; 58%; **Figure 8**). Communication projects attributed approximately 35% of the debits (n = 26,527 debits). The remaining 5,201 debits were attributed to a variety of other Project Types.

[5] This data does not include debits attributed to either the Reserve Account or Advanced Payment multipliers.

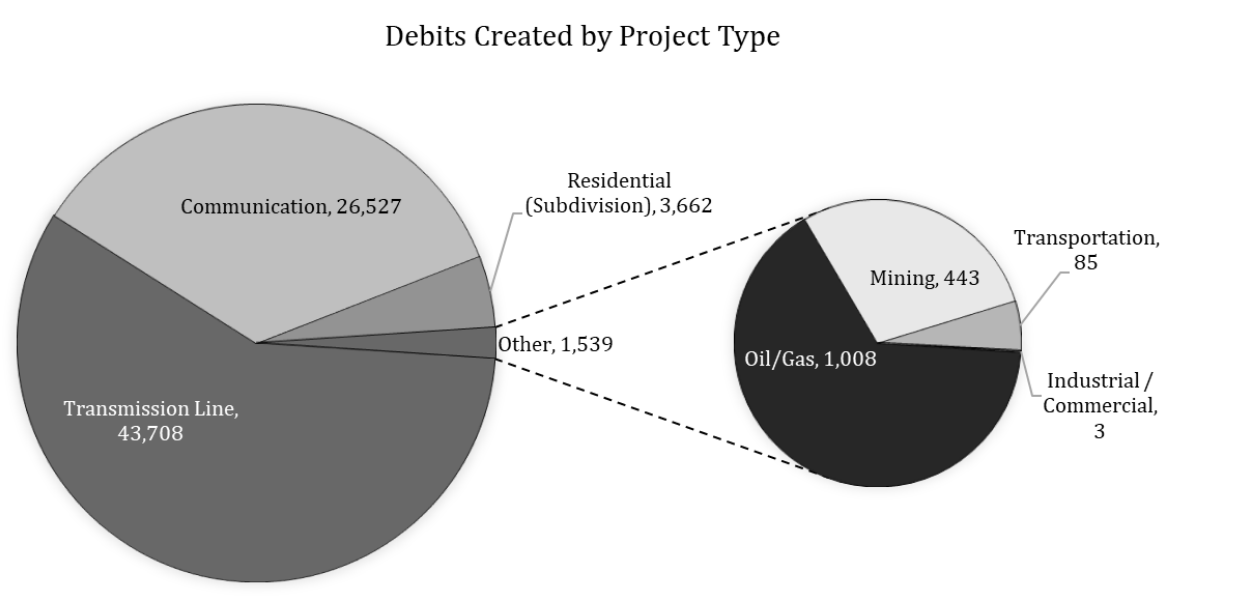

Figure 8. Debits created by Project Type for projects that were assessed mitigation and which reached *Concluded* by December 31, 2024.

Within each Project Type, the number of total debits accrued can be highly variable from project to project. This is due to several major factors, including: 1) project location - where the project and all of the individual disturbances are sited (i.e., highly functional, generally pristine habitat vs. low functioning, disturbed habitat); 2) the number of individual new disturbances necessary to implement the project (i.e., using existing roads vs. building new roads); 3) project size (i.e., larger direct footprint vs. smaller direct footprint); 4) project duration (i.e., many years on the landscape vs. very few years of activity); 5) project structure (i.e., whether disturbances are above or below ground); and 6) when and how the project is implemented and consistency with the EO provisions.

For each Project Type, the total debits summed and the average total debits per project for all projects within that category is shown in **Table 3**.

Table 3. Total debits categorized by major Project Type and the median and average number of debits per project for that Project Type.

Project Types	Count of Projects	Total Debits	Median	Average Debits
Infrastructure – Transmission Line	4	43,708	1,503	10,927
Infrastructure – Communication	4	26,527	8,540	6,632
Infrastructure – Residential (subdivision)	9	3,662	83	407
Energy – Oil/Gas	7	1,008	68	144
Mining	15	443	5	30
Infrastructure – Transportation	7	85	8	12
Infrastructure – Industrial/Commercial	3	3	0	1
Infrastructure – Pipeline (Major)	1	0	0	0
Agriculture – Land	1	0	0	0

OFFSETTING IMPACTS: BALANCING DEVELOPMENT WITH CONSERVATION

Key Elements for Developers in Montana's Mitigation System

Compensatory mitigation is one tool included in Montana's conservation toolbox that developers can use to offset development impacts. When mitigation is timely and effective, habitat loss and fragmentation due to development are offset so that the quantity and quality of habitat for sage-grouse is at least maintained. This goal is complimentary to goals and objectives set forth in the BLM and USFS land use plans.

Montana's Mitigation System is derived from and informed by both state and federal guidance. The Mitigation System incentivizes voluntary conservation activities to increase the quantity and quality of sage-grouse habitat while simultaneously incentivizing conservation by project developers through implementation of the mitigation hierarchy where impacts are offset. Implementation of the full mitigation hierarchy (avoidance, minimization, reclamation, and compensation using a systematic approach) directly and effectively addresses the threat of habitat loss, degradation, and fragmentation while at the same time allowing development and economic activity in Montana's sage-grouse habitat.

A mitigation marketplace provides a platform where conservation actors and developers exchange credits and debits based on free market principles and in ways that incentivize voluntary conservation. Developers are incentivized to keep mitigation obligations as low as possible. Minimizing mitigation obligations may be accomplished by thoughtful project siting and implementation to avoid high quality habitats and steer towards areas of existing surface disturbance. Implementing development projects as consistently with the EO as possible provides developers additional measures for achieving minimal mitigation obligations. Credit providers are incentivized to create the greatest number of credits possible per physical acre for the expenditures incurred, which is accomplished by focusing preservation efforts in high quality habitat with minimal to no existing surface disturbance or focusing restoration or enhancement efforts in low-quality habitat areas.

Full details about the elements are available in the MSGOT-approved Habitat Quantification Tool Technical Manual and the Policy Guidance Document (https://sagegrouse.mt.gov/Team). Data specific to the following key elements are presented for calendar year 2024, below.

Summary of Mitigation Options Selected by Developers in 2024

At this time, developers have two mitigation mechanisms or options available to offset the impacts of their projects in Montana: 1) developers can purchase credits from the State by making a contribution to the Stewardship Account or 2) developers can create their own credits by implementing conservation projects through PRM. It is important to note that PRM conservation projects must be in place prior to initiating a development project. A developer can choose either option or a combination of the two options. The following section summarizes how developers decided to offset impacts (total debits) in 2024.

Data Preparation

The following results are based on the 51 development projects for which an HQT calculation was performed and for which reached *Concluded* by December 31, 2024.

Results: Mitigation Option Selected

Of the 51 projects that reached the *Concluded* stage, 34 projects resulted in a mitigation obligation greater than zero. Developers are always given complete discretion to choose how to offset their impacts. In 2024, of the 34 projects assessed mitigation, developers for 31 projects elected to offset their project impacts and fulfill the mitigation obligation by contributing to the Stewardship Account (91%; **Figure 9**).

Alternatively, PRM was selected for three development projects (9%; **Figure 9**). These three projects are attributed to multiple proponents utilizing PRM conservation projects to offset their own subsequent development projects. In other words, these proponents created their own PRM pool of credits for their own use to offset their subsequent development projects. Permittee-Responsible Mitigation is tracked separately from mitigation paid through the Stewardship Account.

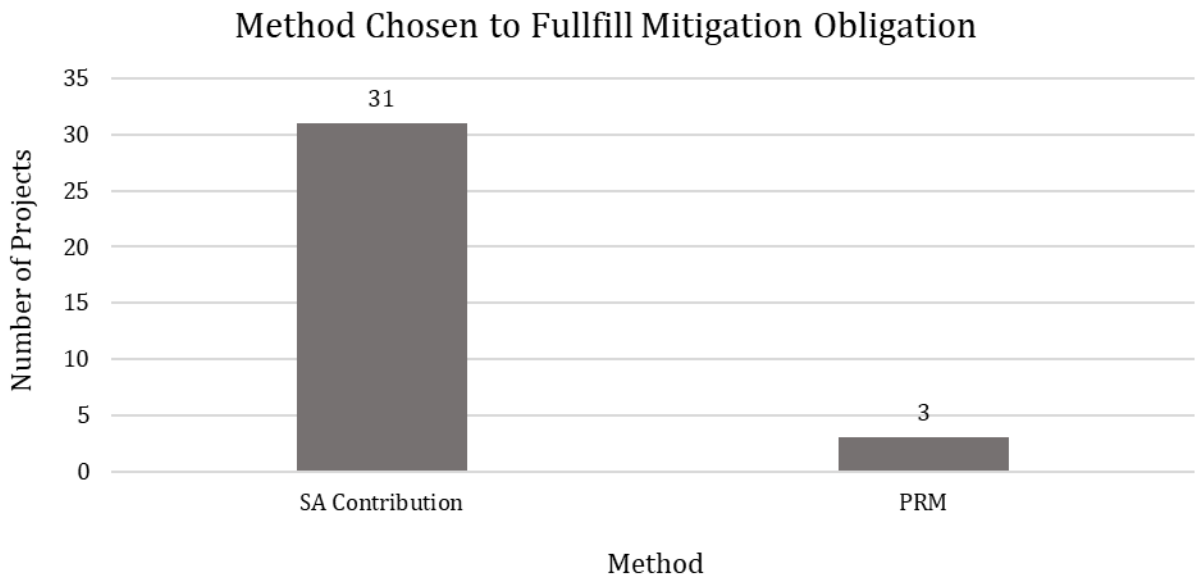

Figure 9. The mitigation method chosen by proponents for 34 projects that reached *Concluded* in 2024 and resulted in a mitigation obligation greater than zero.

Stewardship Account Contributions in Calendar Year 2024

Of the total $7,427,493.13 received through mitigation contributions to date, $784,582.61 were deposited into the Stewardship Account during the 2024 reporting period (n = 41 projects; **Figure 10**).

In total, the Program received Stewardship Account contributions for 41 projects in 2024. These contribution payments were for projects that reached *Completed Review* between 2020 and 2024 and made contribution in 2024 (2020: 1 project; 2021: 1 project; 2023: 8 projects; 2024: 31 projects).

Of the 2024 Stewardship Account deposits, 68.5% were attributed to projects located in the Southeastern Service Area ($537,176.06), 29.4% of the total payments were for projects located within the Central Service Area ($230,938.68), 1% of the total payments were for projects located within the Southwestern Service Area ($8,456.15), and 1.1% of the total payments were for projects located within the North Central Service Area ($8,011.72; Figures 10 and 11).
Across all Service Areas, approximately 84% of contributions were for project impacts located in a Core Area ($660,166.23; **Figure 11**). Approximately 16% of payments were for project impacts located in General Habitat ($124,416.38).

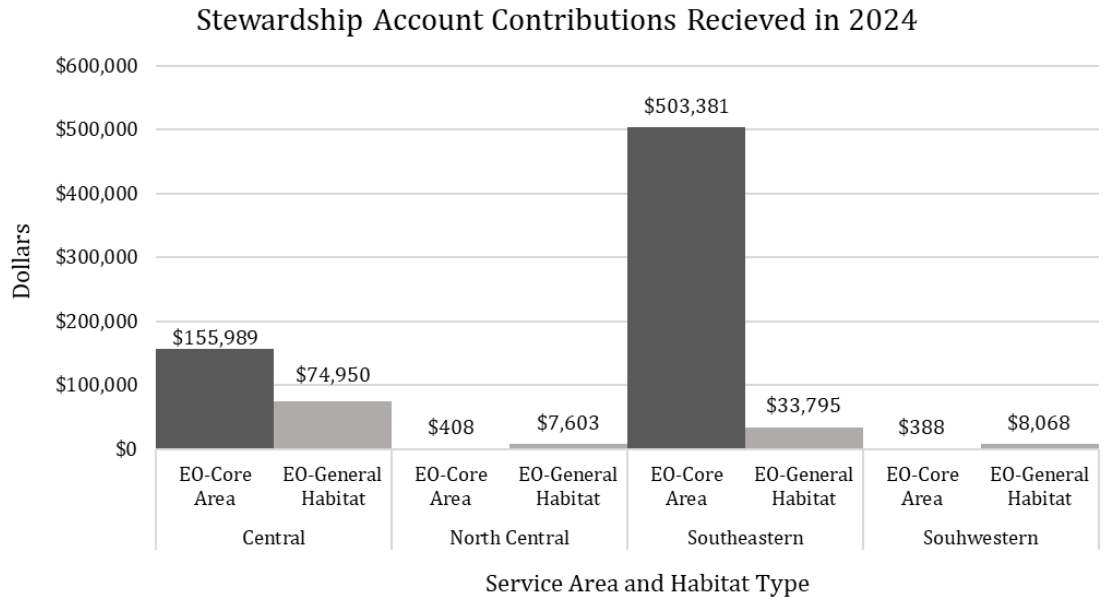

Figure 10. Contributions made to the Stewardship Account between January 1, 2024, and December 31, 2024, according to Service Area and habitat designation.

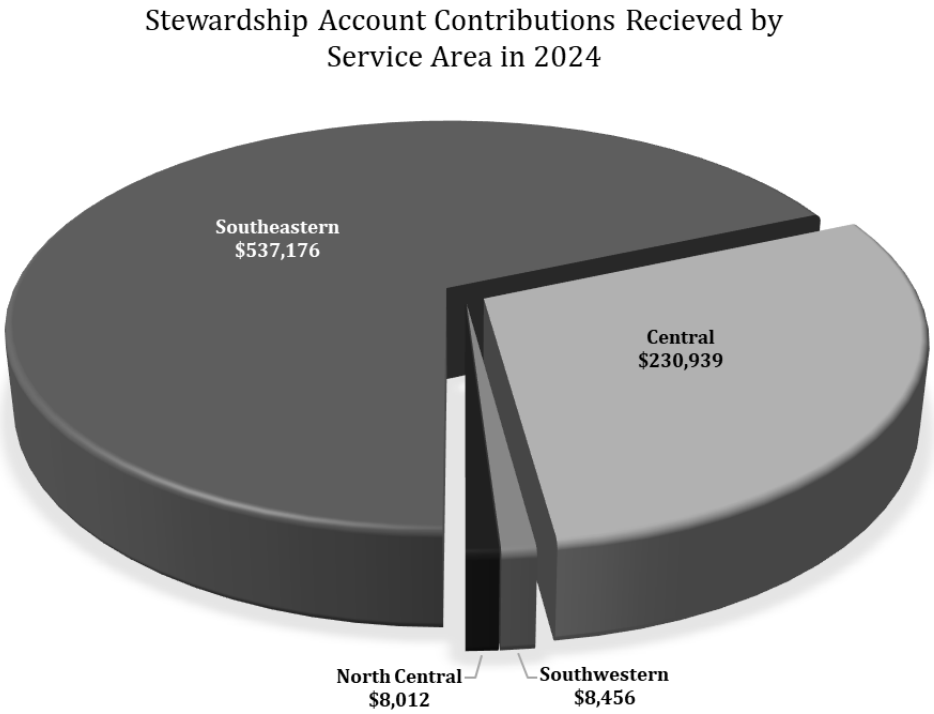

Figure 11. Contributions made to the Stewardship Account between January 1, 2024, and December 31, 2024, according to Service Area.

Similar to the observation of high variation of total debits per individual project (**Table 3**), the amount of Stewardship Account contributions made in 2024 varied widely among individual projects, as well as for individual projects grouped by Project Type (**Table 4**). Such variation among contributions is attributed to the same set of factors influencing the variation of total debits calculated for individual development projects. Such factors include the number of individual disturbances and types associated with individual projects, project size, project duration, project location, and the underlying habitat quality. For example, the Infrastructure – Communication Project Type includes Disturbance Types ranging from a tower pad to power lines, fiber optic lines and new roads. Some Infrastructure – Communication projects include all four of those Disturbance Types, whereas other Infrastructure – Communication projects may only entail fiber optic lines. Thus, the amount of each Stewardship Account contribution varies considerably as the impacts are assessed based on the Disturbance Types submitted.

Across all Project Types and habitat designations, individual contributions for a single project ranged from a minimum of $11.36 to a maximum of $358,180.34 (**Table 4**). The average contribution was $19,136.16.

Table 4. Median and average Stewardship Account contributions deposited between January 1, 2024, and December 31, 2024, by Project Type (n = 41 projects).

Project Type	Number of Projects	Median Contribution	Average Contributions
Infrastructure – Communication	5	$69,822.76	$60,497.62
Infrastructure – Industrial/Commercial	2	$19,378.95	$19,378.95
Mining	14	$300.95	$1,146.59
Energy – Oil/Gas	3	$748.02	$1,442.88
Infrastructure – Residential (subdivision)	7	$821.07	$5,194.21
Infrastructure – Transmission Line	4	$13,518.82	$96,311.64
Infrastructure – Transportation	6	$180.40	$224.96
Grand Total	**41**	**$748.02**	**$19,136.16**

SUMMARY OF 2024 CONSULTATION ACTIVITIES FOR CONSERVATION PROJECTS

Mitigation Credits Created by MSGOT through Stewardship Account Grants, by Developers through Permittee-Responsible Mitigation Projects, and Other Means

Introduction

Montana recognizes conservation preservation projects capable of producing credits by avoiding future loss or fragmentation of otherwise intact sage-grouse habitat by legally removing identified threats through implementation of conservation easements (e.g., in place for perpetuity) or conservation leases (e.g., in place for a defined amount of time). Conservation leases differ from conservation easements in that conservation leases are for a fixed number of years decided upon by the landowner but must be a minimum of 15 years. At the expiration of the term, the lease expires, and the landowner is free to exercise those rights once again. Long-term, voluntary protection of remaining habitat is the gold standard of habitat conservation in Montana.

Montana also recognizes conservation restoration and enhancement projects that restore previously disturbed land or enhance existing functional habitat through active management (e.g., conifer removal, sage-brush reseeding, structure removal, invasive species treatments). Unlike preservation projects, restoration or enhancement projects potentially increase the quantity or quality of functional habitat at a particular site.

Creating and selling credits in the Mitigation System by preserving, restoring, or enhancing land which increases the functional habitat quality or quantity for sage-grouse could generate revenue for respective landowners. Developing conservation projects and participation in the Mitigation System is voluntary on the part of private landowners.

Credits may be produced from conservation projects through grant funding provided by the Stewardship Account (i.e., Stewardship Account Grants), created under any other MSGOT-approved

mitigation mechanism (e.g., conservation bank or habitat exchange), or created and used by project developers conducting their own compensatory mitigation projects or working with third parties engaged in generating credits from conservation projects to offset development impacts (i.e., PRM). Funding from the Stewardship Account is not required to create credits.

Application of Baseline to Preservation Projects

Regardless of funding source (e.g., Stewardship Account Grant, PRM), each conservation project must demonstrate additionality to qualify for credits. Additionality refers to the requirements that: 1) regulatory – credit-generating habitat benefits from a project must be in addition to what would have happened in the absence of a conservation project (baseline before implementation) and in addition to what is already otherwise required by existing law and regulations; and 2) legal and financial commitments.

For credits created through conservation easements, the easement itself satisfies the additionality requirement, but baseline will be adjusted to account for the fact that, absent additional restoration or enhancement activities, conservation easements or leases preserve the status quo and do not create new functional acres. For restoration or enhancement credit sites, a legal site protection instrument permitting or prohibiting certain activities to preserve the integrity of the habitat, respectively, satisfies the additionality requirement.

To more accurately reflect that conservation easements and leases, in the absence of restoration or enhancement activities, preserve the status quo and do not create new functional acres, Montana defines baseline for conservation preservation projects as 40% of post-project habitat function determined by the HQT as a default. For this reason, the credits produced from the implementation of a preservation project will be approximately 60% less than the Raw HQT Score (i.e., functional acres gained).

Application Policy Multipliers for Habitat Uplift Created from Restoration and Enhancement Projects

A positive multiplier is applied to the number of new functional acres gained from the successful implementation of a given restoration or enhancement project because such conservation projects increase and add new functional acres above baseline. A positive 10% multiplier is applied to new functional acres gained in a Core Area and a positive 5% multiplier is applied to new functional acre gained in General Habitat and Connectivity Area.

Application Site-Specific Multipliers for Conservation Projects

A positive multiplier is applied to conservation easements and leases for each active lek located inside of the property boundary or within two or four miles of the property boundary located in General Habitat or Core Area, respectively.

Data Preparation

The HQT is also applied to conservation projects. The initial HQT results are referred to as functional acres gained, which sum to equal the Raw HQT Score. After applying applicable credit

policy multipliers and then baseline adjustments (as necessary for preservation projects), functional acres gained are converted to credits. This section reports data for both the functional acres gained (pre-policy adjustments) and the total number of available credits (post-policy adjustments).

Conservation projects included in this section are those that either closed (Stewardship Account Grant) or reached *Concluded* (PRM conservation projects).

Results: Sum of Functional Acres Gained from Stewardship Account Grants and PRM Conservation Projects

Stewardship Account Grant projects with a signed Record of Decision (ROD; hereafter, closed) between January 1, 2024, and December 31, 2024, include Brewer Ranch, Haywire Ranch, Schultz-Gran Prairie Ranches, High Ridge Land LLC Perpetual Conservation Easement and Restoration Project, Bruce Johnson Ranch, and Dan and Mary Ann Johnson Ranch (n = 6 projects).

Three PRM conservation projects were *Concluded* between January 1, 2024, and December 31, 2024, include Lesh East Perpetual Conservation Easement, Lesh West Perpetual Conservation Easement, and LO Ranch conservation easements (n = 3 projects).

In 2024, there were a total of 835,953 functional acres gained due to these nine conservation projects across all Service Areas (**Table 5**). This number accounts for conservation projects funded through Stewardship Account Grants (n = 6 projects) and PRM (n = 3 projects).

The greatest gain of functional acres was recorded for the Central Service Area accounting for 69% of the total functional acres gained (n = 577,623 functional acres gained; **Figure 12**). The second greatest gain of functional acres was seen in the Southeastern Service Area, totaling 256,759 functional acres gained (31%). The remaining functional acres gained were located in the Southwestern Service Area (1,571 functional acres gained). The North Central Service Area had no functional acres gained in 2024.

Of the 835,953 functional acres gained statewide, 94% were generated in a Core Area (738,301) and 6% were generated in General Habitat (52,652; **Figure 12**). No functional acres were gained in Connectivity Area in 2024.

Table 5. The number of functional acres gained due to conservation projects that closed or reached *Concluded* between January 1, 2024, and December 31, 2024, across all Service Areas.

Source	Functional Acres Gained				
	Service Area				Statewide
	Central	North Central	Southeastern	Southwestern	
Stewardship Account Grants + PRM Projects	577,623	0	256,759	1,571	835,953

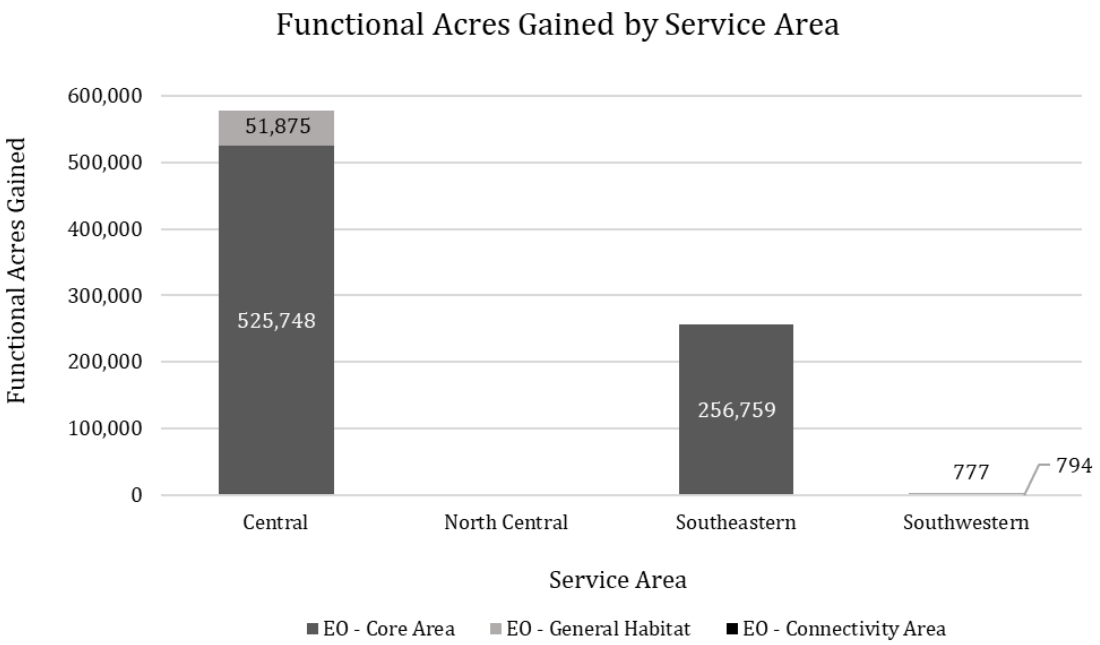

Figure 12. Number of functional acres gained by Service Area and EO habitat designation for conservation projects that closed or reached *Concluded* between January 1, 2024, and December 31, 2024 (n = 9 projects).

Credits Created by Implemented Conservation Projects

The following summarizes the total number of credits created by conservation projects that *Concluded* or closed (e.g., implemented) between January 1, 2024, and December 31, 2024, for PRM conservation projects and Stewardship Account Grants, respectively.

Between January 1, 2024, and December 31, 2024, a total of nine conservation projects created a total of 506,110 credits statewide (**Table 6**). Approximately 64% of credits were generated from Stewardship Account Grant projects (n = 325,597 credits) and the remainder from various PRM conservation projects (n = 180,513 credits; **Figure 13**). Of all nine conservation projects, all six Stewardship Account Grant projects were located in the Central Service Area which experienced the greatest number of credits generated in 2024 (64% of credits; n = 325,597 credits), two PRM conservation projects were located in the Southeastern Service Area (35% of credits; n = 178,347 credits), and one PRM conservation project was located in the Southwestern Service Area (<1% of credits; n = 2,166 credits; **Figure 14**; **Figure 15**). No conservation projects were located in the North Central Service Area in 2024.

The majority of credits created in 2024 were produced in Core Area (n = 478,320 credits; 95%) and the remaining 5% of credits were produced in General Habitat (n = 27,790 credits; **Figure 14**).

Table 6. Number of credits created by conservation projects by Service Area and statewide through the application of applicable policy modifiers to the functional acres gained (e.g., baseline adjustment for preservation projects, newly created functional acre modifier for restoration or enhancement projects, application of lek multipliers to all conservation projects). Credits

generated from both closed Stewardship Account Grant projects and *Concluded* PRM conservation projects between January 1, 2024, and December 31, 2024, are summarized.

Source	Credits				
	Service Area				Statewide
	Central	North Central	Southeastern	Southwestern	
Stewardship Account Grants + PRM Projects	325,597	0	178,347	2,166	506,110

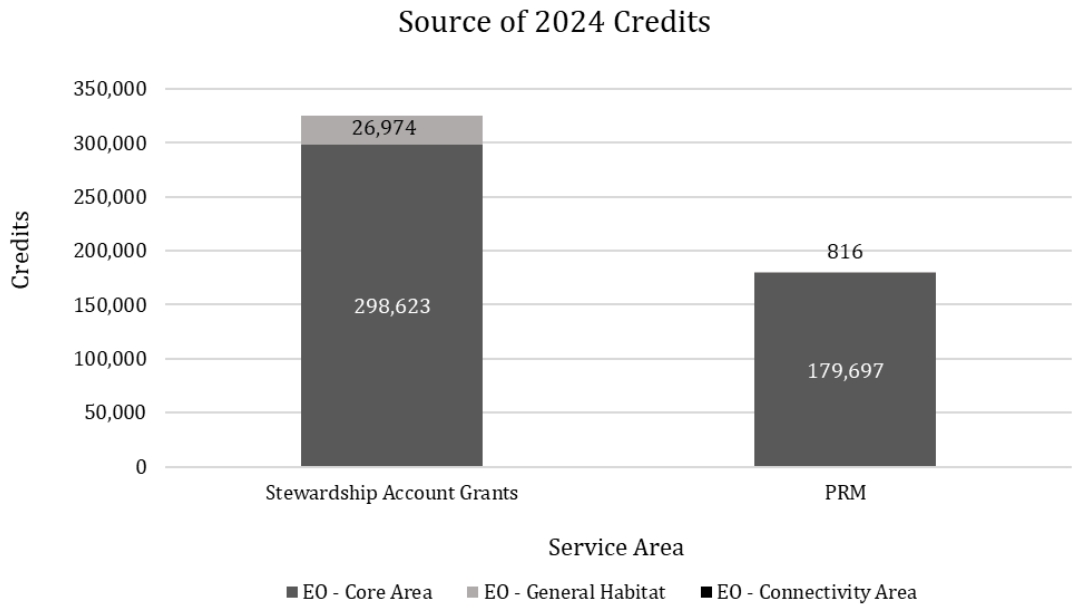

Figure 13. Number of credits created by Stewardship Account Grant projects that closed (n = 6 projects) and PRM conservation projects that *Concluded* (n = 3 projects) between January 1, 2024, and December 31, 2024.

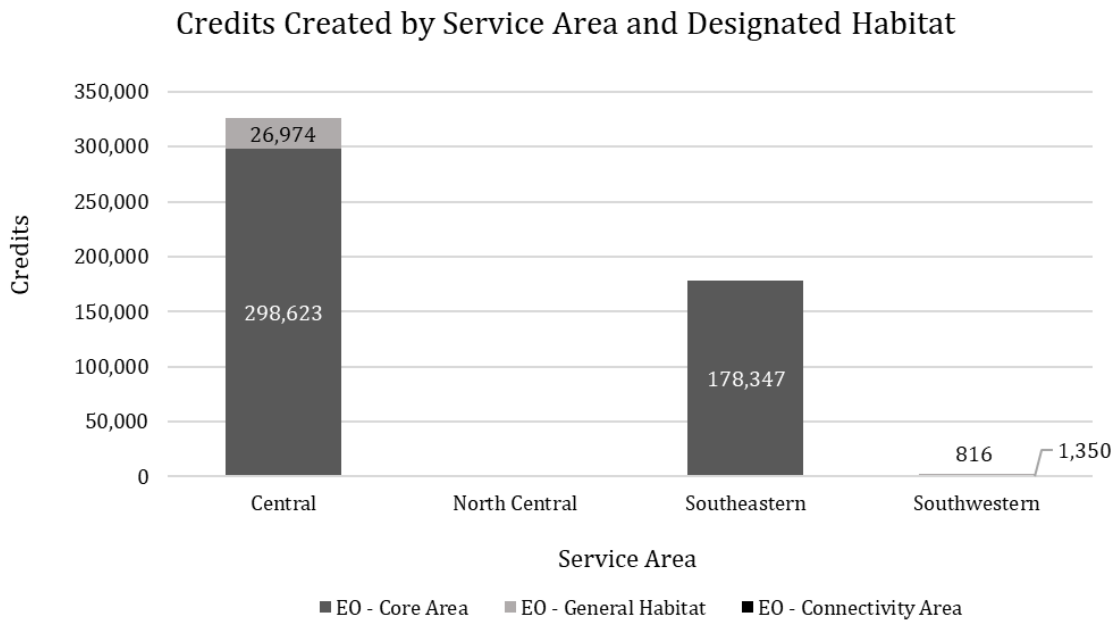

Figure 14. Total number of credits created by Service Area and EO habitat designation. All credit sources were combined and reported for conservation projects that closed or *Concluded* between January 1, 2024, and December 31, 2024.

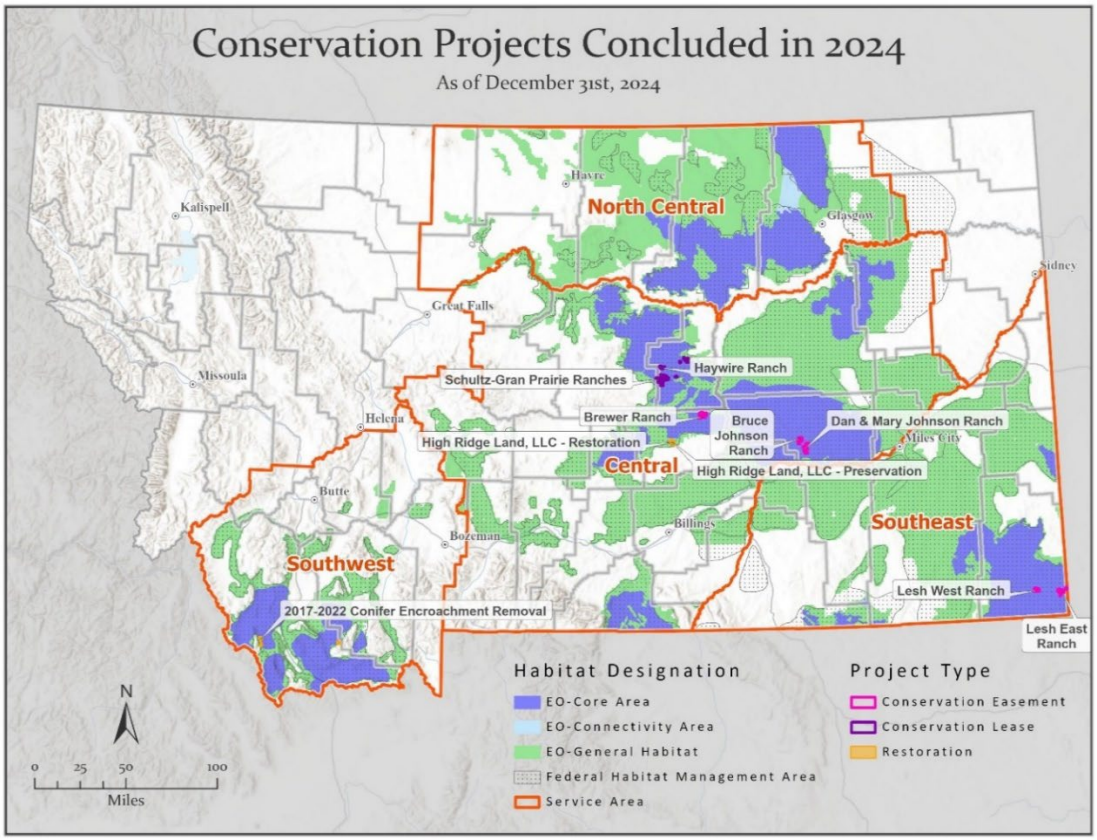

Figure 15. Locations of conservation projects that closed or *Concluded* between January 1, 2024, and December 31, 2024.

SUMMARY OF STEWARDSHIP ACCOUNT CONTRIBUTIONS FOR ALL YEARS

Contributing to the Stewardship Account is an in-lieu fee mechanism if sufficient credits are unavailable through other mechanisms and the developer does not wish to take a PRM approach. Contributions to the Stewardship Account shift the burden from the proponent or project developer to the State via MSGOT to secure an equivalent number of credits and subtracts those credits from the Stewardship Account credit balance.

Mitigation obligations, including contributions to the Stewardship Account, should be implemented *after* a developer obtains all necessary permits but *before* the development project is implemented and construction starts. This protocol affords developers the flexibility to decide when to initiate the permitting process, to modify a project during the permitting process, to decide on the exact timeline to implement a project, to delay implementation once permits are obtained, or to cancel the project altogether.

Providing this flexibility to developers to decide when to complete the permitting process creates uncertainty for MSGOT and the Program, especially for those development projects offset through Stewardship Account contributions. Stewardship Account contributions only become available to MSGOT and the Program to allocate for conservation after a contribution is made and recorded, creating an "accounts receivable" delay or an "amount due" inherent in the mitigation system.

Data Preparation

The Program compiled information about the status and disposition of Stewardship Account contributions for all development projects for all years to summarize Stewardship Account activity for all time. Stewardship Account activity beginning in 2018 was compiled because this was when the first deposit into the Stewardship Account was received. Stewardship Account activity or expected donation summaries are limited to projects that reached *Completed Review* or *Concluded* by December 31, 2024 (i.e., the end of the current reporting period).

The disposition and status of a project's Stewardship Account contribution is classified as one of the following:

1. Due – Reviewer Tracking: The developer had selected the Stewardship Account at the time the Program completed its review, but the donation had not yet been received by December 31, 2024. The Program's reviewers are actively tracking the project for eventual receipt of the funds. These funds are "due" to the Stewardship Account and the deposit is expected at some point in the future.
2. Received: Contributions were received and deposited into the Stewardship Account.

Results: Stewardship Account Contributions - Received

Since the final administrative rules took effect, all developer contributions to the Stewardship Account should be allocated towards Stewardship Account Grants to offset the impact of the development project for which the contribution was made. A total of $7,427,493.13 have been received from Stewardship Account contributions since 2018 through December 31, 2024, by

developers who decided not to implement their own PRM conservation projects and transferred their mitigation obligation to the State via MSGOT (i.e., Received status; **Figure 16**).

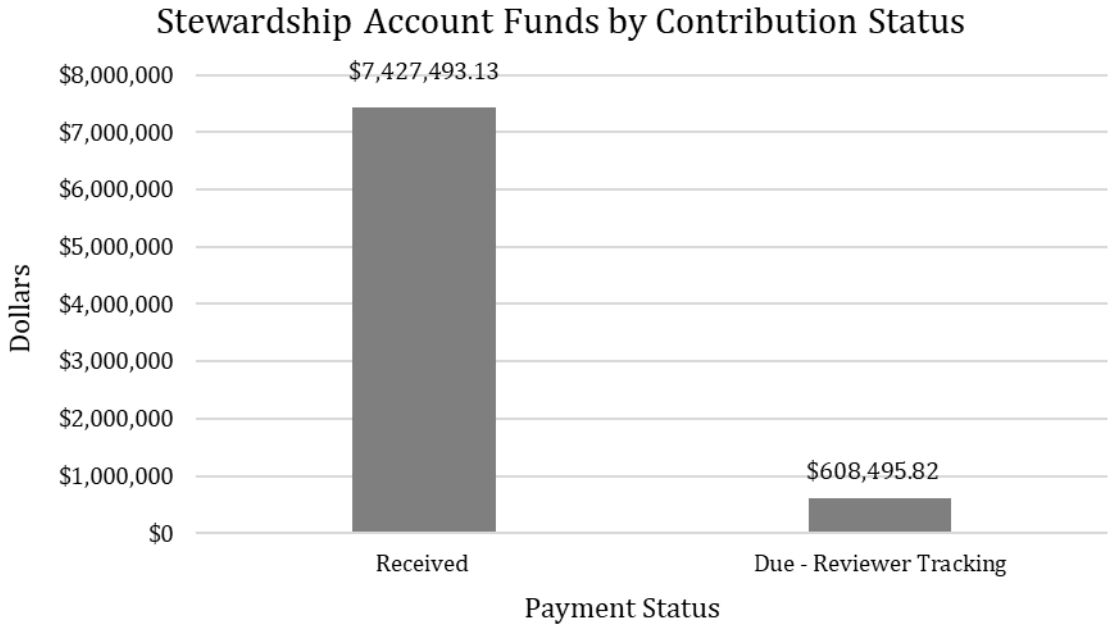

Figure 16. Stewardship Account funds by contribution status across all development projects in *Completed Review* or *Concluded* from 2018 to December 31, 2024.

Results: Stewardship Account Contributions - Due

A total of $608,495.82 funds are categorized as Due – Reviewer Tracking as of December 31, 2024, from projects whose developer has selected to make a Stewardship Account Contribution at some point in the future (**Table 8**). It is the Program's understanding that these developers have delayed starting the permit application process, started the application process but have not yet obtained all necessary permits, or have obtained all necessary permits but delayed project implementation.

Table 7. The total amount owed by developers to the Stewardship Account for development projects by Project Type through December 31, 2024.

Project Type	Number of Projects	Amount Owed
Infrastructure – Communication	4	$25,512.50
Forestry	1	$7,378.24
Infrastructure – Industrial/Commercial	2	$676.58
Mining	30	$166,584.41
Energy – Oil/Gas	8	$128,282.65
Infrastructure – Pipeline (Major)	2	$160,148.67
Infrastructure – Recreation	2	$13,881.27
Infrastructure – Residential (subdivision)	8	$18,095.28
Infrastructure – Transportation	7	$80,727.73
Agriculture – Water	3	$7,208.49
Grand Total	**67**	**$608,495.82**

SUMMARY OF FUNDED STEWARDSHIP ACCOUNT GRANTS FOR ALL YEARS

Introduction

The purpose of the Stewardship Act is to "provide competitive grant funding and establish ongoing free-market mechanisms for voluntary, incentive-based conservation measures that emphasize maintaining, enhancing, restoring, expanding, and benefitting sage-grouse habitat and populations on private lands, and public lands as needed." In conjunction with MCA 2-15-243, the Stewardship Act charges MSGOT with certain duties. The Stewardship Act also authorizes MSGOT to adopt administrative rules to allocate the Act's Stewardship Account funds for purposes of conservation grants to contribute credits to the Mitigation System.

The Stewardship Act provided an avenue for MSGOT to proactively jumpstart creation of credits through Stewardship Account Grants while the Program concurrently worked with stakeholders to develop the mitigation framework and the HQT. MSGOT then adopted the October 2018 Policy Guidance document and HQT. Since that time mitigation contributions from developers have been used to fund conservation projects.

Results: All Funded Stewardship Account Grants

MSGOT offered a total of four grant cycles from 2016 to December 31, 2024. The first was in 2016/2017, the second cycle was in 2019, the third in 2020, and the fourth in 2022. MSGOT approved an open funding cycle beginning in 2023. As of December 31, 2024, a total of $12,712,871 have been obligated for Stewardship Account Grants.

The Program has vetted and MSGOT has approved Stewardship Account Grants for a total of conservation projects which have closed by the end of 2024, including 19 conservation easements and three conservation leases with two of the conservation projects also containing restoration activities (**Figure 17**).

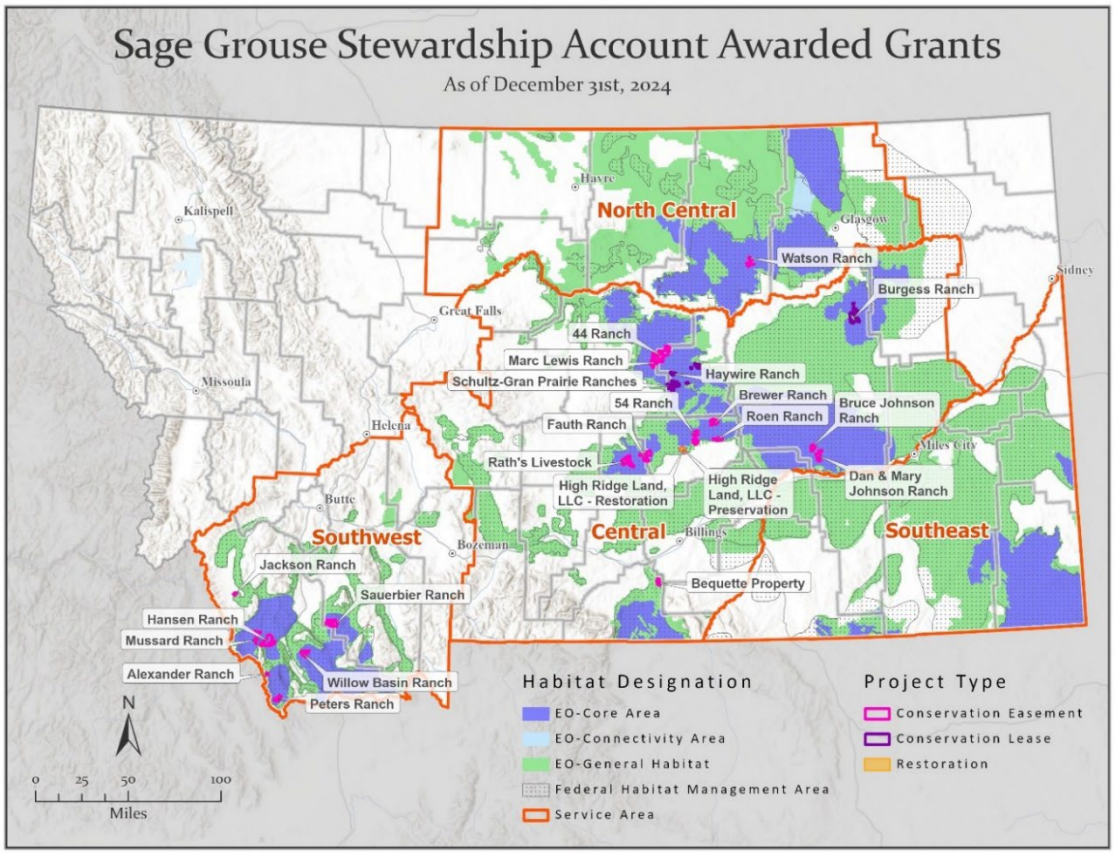

Figure 17. Locations of all conservation projects funded with Stewardship Account Grants that were implemented by the end of 2024. Additional details can be found in the MSGOT Meeting Archive, Audio Summary Minutes, Notes, and Handouts.

The status of all Stewardship Account Grant projects selected for funding across all four cycles as of December 31, 2024, is shown in **Table 7**. Of the total 26 projects selected for funding, four projects were withdrawn by the applicant and the remaining 22 projects have closed.

Table 8. Status of all projects selected for Stewardship Account Grants as of December 31, 2024.

Proposal	Type	County	Habitat Class	Size (acres)	Date ROD Signed
First Cycle – 2016/2017					
44 Ranch	Perpetual Easement	Petroleum, Fergus	100% Core	18,033	November 2016
Raths Livestock	Perpetual Easement	Golden Valley	100% Core	11,230	September 2018
Watson	Perpetual Easement	Phillips	100% Core	2,691	December 2019
Hansen	Perpetual Easement	Beaverhead	98% Core	13,535	July 2018
Second Cycle – 2019					
Willow Basin	Perpetual Easement	Beaverhead	100% Core	3,989	December 2019
Marc Lewis	Perpetual Easement	Fergus, Petroleum	100% Core	3,743	December 2019
Sauerbier Ranch	Perpetual Easement	Beaverhead, Madison	100% Core	7,697	January 2020
Burgess Ranch	30-YearConservation Lease + Restoration	Garfield	80% Core	12,901/2, 765	March 2020
Third Cycle – 2020					
54 Ranch	Perpetual Easement	Musselshell	60% Core	6,660	April 2021
Alexander Ranch	Perpetual Easement	Beaverhead	99% Core	679	November 2022
Bequette Property	Perpetual Easement	Carbon	100% General	2,524	November 2022
Fauth Ranch	Perpetual Easement	Musselshell, Golden Valley	100% Core	8,313	December 2021
Jackson Ranch	Perpetual Easement	Beaverhead	100% General	924	March 2022
Mussard Ranch	Perpetual Easement	Beaverhead	100% Core	2,436	February 2021
Peters Ranch	Perpetual Easement	Beaverhead	100% Core	3414	December 2021
Fourth Cycle – 2022					
Brewer Ranch	Perpetual Easement	Musselshell	100% Core	5,550	January 2024
Bruce Johnson Ranch	Perpetual Easement	Rosebud	100% Core	2,393	September 2024
Dan and Mary Ann Johnson Ranch	Perpetual Easement	Rosebud	100% Core	7,052	September 2024
Haywire Ranch	15-Year Conservation Lease	Petroleum	94% Core	4,317	July 2024
High Ridge Land LLC	Perpetual Easement + Restoration	Musselshell	100% General	2,164/ 1,564	July 2024
Roen Ranch	Perpetual Easement	Musselshell	99% Core	3,639	November 2022
Schultz-Gran Prairie Ranches	20-Year Conservation Lease	Petroleum, Fergus	100% Core	8,031	July 2024

SYNTHESIS OF MITIGATION SYSTEM KEY METRICS FOR ALL YEARS

Stewardship Account Credit/Debit Balance

As of December 31, 2024, a total of 1,023,106 debits have been created due to the compensatory mitigated impacts for development projects throughout all four Service Areas. The total debits are calculated from development projects which resulted in mitigation assessed to the developer or a Desktop Analysis, which reached *Concluded* by December 31, 2024, and which opted to fulfill mitigation obligations through Stewardship Account contributions (n = 347 projects; **Table 8**). In contrast, as of December 31, 2024, a total of 2,043,309 credits were created by MSGOT through Stewardship Account Grants allocated to fund conservation projects.

The balance of total debits and total credits represents a snapshot in time, on December 31, 2024. However, Montana's Mitigation System incorporates time. Debits or credits are calculated for the life of a project; therefore, not all debits and credits are actively on the landscape simultaneously. For example, a conservation project may be on the landscape for 100 years and create 10 credits per year for a total of 1,000 credits for all time. However, not all 1,000 credits are actively on the landscape in the first year of the project. Disturbance projects may have more fluctuation in their impacts where the majority of impacts occur in the first couple of years during the construction phase followed by less impacts during the operation and reclamation phases. Therefore, the annual balance of credits and debits fluctuates greatly. Due to this fluctuation, the balance of credits and debits reported for Annual Report purposes in **Table 9** is combined to cover all years (past, present, and future) for which impacts (functional acres gained and lost) are incurred by conservation and development projects.

Table 9. Overview of the key mitigation metrics by Service Area for all years. The data in this table represent all development projects for which an HQT calculation was completed. These numbers include development projects that have been *Concluded*. All Stewardship Account Grants that have closed as of December 31, 2024, are also included. These numbers do not include debits attributed to projects for which PRM was the chosen mitigation method nor does it include credits attributed to PRM conservation projects.

Key Metric	Service Area				Statewide
	Central	North Central	Southwestern	Southeastern	
Count of Development Projects	163	91	31	62	347
Functional Acres Lost	495,199	58,046	7,017	100,463	660,725
Total Debits (Excludes Advance Payment and Reserve Account Debits)	**845,766**	**58,348**	**7,166**	**111,826**	**1,023,106**
Count of Conservation Projects	14	1	7	0	22
Functional Acres Gained	2,907,716	72,336	1,723,006	0	4,703,058
Total Credits	**1,325,172**	**28,934**	**689,202**	**0**	**2,043,309**
Balance of Credits	***479,406***	***-29,414***	***682,036***	***-111,826***	***1,020,203***

Permittee-Responsible Mitigation Projects for All Years

As of December 31, 2024, ten PRM conservation projects have been implemented by four different developers across all Service Areas except for the North Central Service Area (**Figure 18**). These conservation projects include five conservation easements, one oil and gas field restoration project, one conifer removal restoration project, two conifer removal projects, and one road restoration project. See **Figure 18** below for locations of these projects and **Table 10** for credit details.

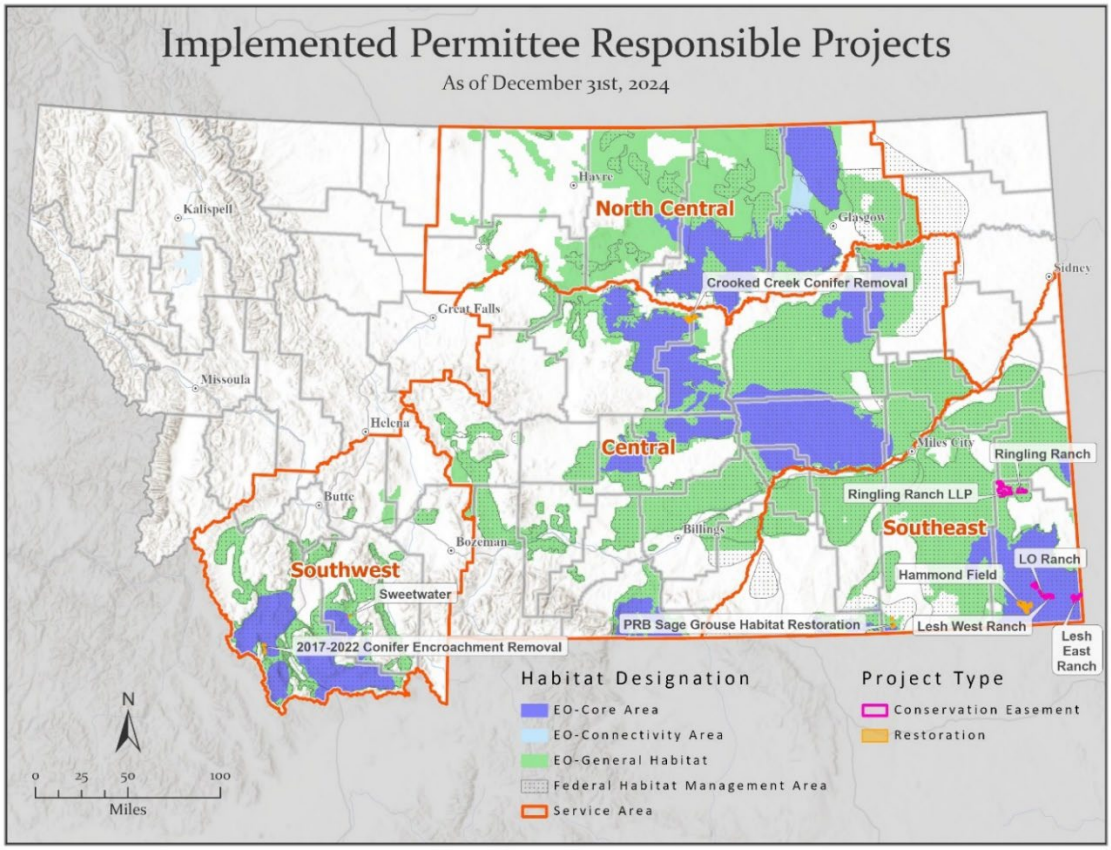

Figure 18. Locations of PRM conservation projects that have been implemented from 2018 to December 31, 2024.

Table 10. Total credits attributed to PRM conservation projects for all years through 2024.

Project Name	Conservation Project Type	Credits
Ringling Ranch Conservation Easement	Conservation Easement	110,814.15
Ringling Ranch Ltd. Conservation Easement	Conservation Easement	349,318.83
Hammond Field Reclamation	Restoration	130,516.11
Crooked Creek Conifer Removal	Restoration	8,143.75
PRB Sage Grouse Habitat Restoration	Restoration	124.63
LO Ranch Conservation Easement	Conservation Easement	337,976.01
Lesh Conservation Easement (West)	Conservation Easement	128,092.07
Lesh Conservation Easement (East)	Conservation Easement	50,256.58
2017-2022 Conifer Encroachment Removal	Restoration	2,166.14
Sweetwater Road	Restoration	5,981.20
Total		**1,123,387.47**

ADAPTIVE MANAGEMENT

Adaptive management is a fundamental principle of the Montana Mitigation System. When it comes to conserving sage-grouse populations, much is known about the species' habitat preferences and population responses to the loss and fragmentation of sagebrush habitats. However, less is known about how sage-grouse populations respond to anthropogenic disturbances and more generally to mitigation measures which are intended to offset anthropogenic disturbance. Furthermore, Montana's Mitigation System includes assumptions in both the Policy Guidance Document and the HQT Technical Manual in the absence of perfect knowledge or experience in implementation. For these reasons, the Montana Mitigation System implements an adaptive management approach to periodically evaluate whether mitigation effectively offsets impacts in space and through time to ensure sage-grouse populations are sustained and to ensure Montana achieves the standard of no net loss of sage-grouse habitat.

Adaptive management requires consideration of both habitat outcomes and population status and trends over time, in concert and at multiple spatial scales. The Program's focus is on habitat outcomes while population monitoring, estimation, reporting, and harvest management remain the purview of Montana Fish, Wildlife, and Parks (MFWP). Please see MFWP's Greater Sage-Grouse Population Reports.

Program specific habitat-based objectives are as follows:

- Meet the mitigation standard of no net loss of sage-grouse habitat, net gain preferred.
    - The number of functional acres gained should be equal to or greater than the number of functional acres lost.
    - The number of credits created should be greater than or equal to the number of debits.
- Maintain sufficient credits in the Reserve Account to replace lost or impaired credits.
    - Reserve Account should have a sufficient number of credits on hand to replace lost or impaired credits listed and already used and assigned to offset debits.
- Produce and maintain an adequate credit supply, regardless of the entity who creates them.

Adaptive management does not just occur at static intervals, it is a fluid process and one that the Program, stakeholders, and interested members of the public continue to participate in throughout the years (**Figure 19**). Through the process of continual improvement, participants of the Mitigation System (e.g., Program, project developers, credit providers) learn and implement improvements to protocols, documentation standards, etc. See the *Efforts to Improve Implementation* section above for details on efforts implemented in 2024.

One area for an adaptive management focus is that the Program lacks adequate knowledge of the implementation status and ultimate disposition of development projects for which the Program has completed a review. Additionally, the Program lacks knowledge about the future timing for when contributions to the Stewardship Account will be made by developers who elect to offset impacts by making a contribution.

Because there is no feedback mechanism between developers or the permitting agency and the Program, the Program lacks knowledge about whether a permit was applied for and, when relative to the *Completed Review* date, whether the project is still in the permitting process, whether a permit was issued and whether a project was cancelled or when it was implemented.

In short, the Program lacks knowledge about whether a project did or did not ultimately reach implementation. While time lags can be expected, the duration of time lags and the final disposition of the project remains unknown to the Program. The time lag between when the Program has completed its review and when a project is actually implemented could be a year and sometimes much longer. In some cases, proponents have cancelled projects altogether and the Program remains unaware.

Another challenge associated with the lack of knowledge regarding project implementation and the time lag of implementation is that the Program can't predict when a contribution to the Stewardship Account will actually be made when proponents select that option. Contributions might be made within 1-3 weeks from when the Program completes its review. On the other end of the spectrum, some contributions have been pending for up to two years. Contributions are slated to be made after a developer obtains all necessary permits but before implementation. As of December 31, 2024, developers have committed to offsetting impacts of their projects through a contribution to the Stewardship Account, but $608,495.82 in contributions are still pending (**Figure 16**). The Program will continue to follow up with developers until the project is concluded and pursue a feedback mechanism between the Program and permitting agencies.

Changes to reporting requirements and/or agency protocols would improve the accuracy of reported impacts to sage-grouse habitat through greater temporal maintenance of project implantation status, greater accuracy of implemented development projects' disturbance data, and improved accuracy of the credit/debit ledger. To address these challenges, Program staff periodically follow up with developers with unfulfilled mitigation obligations learn the project status and the Program routinely contracts an independent consultant to update the existing disturbance spatial data. Both endeavors require significant Program resources in terms of staff time and budget.

Stakeholders have engaged with the Program on a regular basis and will continue to do so. The Program continues to work with MSGOT and stakeholders to identify additional topics and potential priorities for an annual adaptive management review (**Appendix B**). Nothing suggests that limitations or unexpected outcomes have been so universally experienced by developers or credit providers that could not be overcome through MSGOT's deliberations or that would trigger a major review / overhaul on its own merits at this time.

Once every five years, a more substantive adaptive management review should take place. At the culmination of 2024, the Montana Sage Grouse Mitigation System has been in implementation for half a decade. In 2024, MSGOT held a listening session as an opportunity for stakeholders to provide comments and input on all aspects of the Program. This included items that are working well, as well as potential changes that might be implemented through adaptive management. Throughout this process, MSGOT remains available to address limitations of either the HQT or mitigation policies until a focus group is convened.

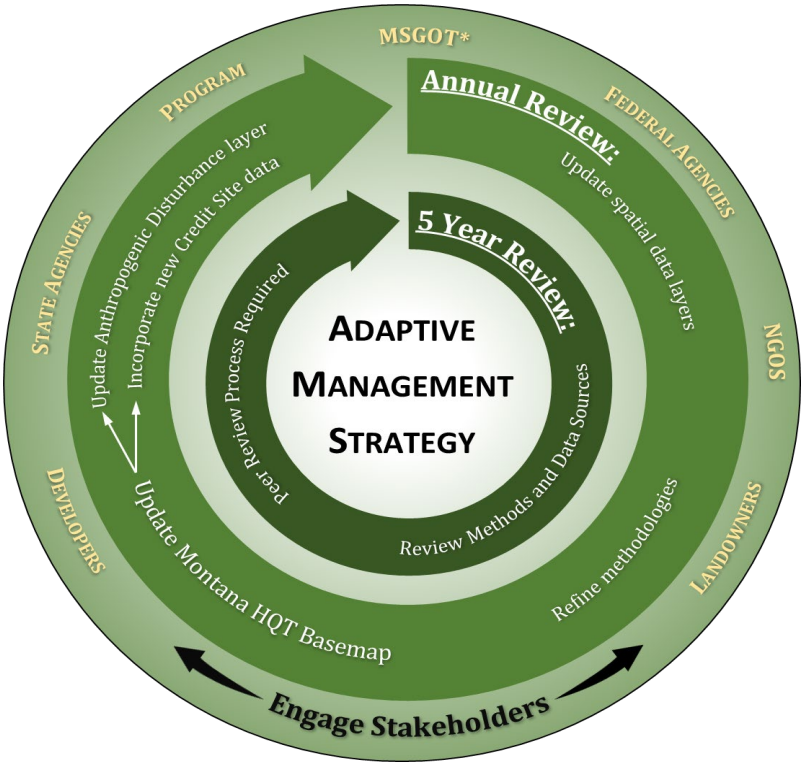

Figure 19. The Program's Adaptive Management Strategy.

GIFTS, TRANSFERS, BEQUESTS, OR DONATIONS

The Stewardship Act provides that MSGOT can review and decide whether to accept offers of grants, gifts, transfers, bequests, or donations of money, personal property, or interests in real property other than fee simple. The Stewardship Act also requires the Program to report any activity regarding appropriations, gifts, transfers, bequests, or donations received, including interest in real property on behalf of the MSGOT. No such activities have occurred.

INTERAGENCY COLLABORATION IN 2024

Throughout 2024, the Program periodically consulted with the USFWS to assure the State is kept abreast of efforts to establish the process for how the status review may be conducted, or any changes to federal policy that might affect Montana's Conservation Strategy.

The Program continued to meet periodically with MFWP, USFS, BLM, USFWS, and Natural Resources Conservation Service to coordinate efforts. Coordination with MFWP is particularly important in that MFWP makes vital contributions to the Program, including compiling seasonal lek survey data, conducting and sharing ongoing research results, and providing critical input for mitigation tools and policy development.

The Program continued to coordinate closely with other state agencies and entities, including the Montana Legislature, the Environmental Quality Council, Montana Department of Transportation, and Montana Board of Oil and Gas Conservation, as these entities implement their own programs and statutory duties.

In 2024, the Program continued to develop its unique and productive relationship with the BLM. The Program participated as a cooperating agency providing input for the BLM process to amend all Montana Resource Management Plans. Montana BLM land use plans and amendments continue to implement the State of Montana's DDCT and HQT methodologies which provides important consistency across Montana's checkboard land ownerships and management boundaries. The State and BLM continue close collaboration on the continued implementation of Montana's Mitigation System and the BLM Land Use Plans to ensure coordinated responses to development projects throughout the state. Thus, the Program provides technical support and pertinent data to support BLM in demonstrating implementation and compliance with their own land use plans and amendments.

APPENDIX A

Montana Sage Grouse Conservation Benchmarks: 2024

Bureau of Land Management:

Greater Sage-Grouse Rangewide Planning

In November 2021, the BLM provided Notice of Intent to amend 2015 and 2019 land use plans regarding sage-grouse. Throughout 2022, public comments were accepted. In June 2022, the BLM released a report describing draft amendments to be analyzed described in a Potential Amendments to Land Use Plans Regarding Greater Sage-Grouse Conservation Scoping Report.

In March 2024, the BLM released a Draft Resource Management Plan Amendment and Environmental Assessment to analyze alternatives to adjust specific sage-grouse habitat management on BLM administered lands. A final Proposed Plan was released in November 2024. Release of this plan was followed by a public comment period and a 60-day Governors Consistency Review due January 2025. As of December 31, 2024, only Oregon and Colorado signed Records of Decision accepting the amended plan. Montana and the other states are continuing to work with the BLM to work towards a ROD.

Utility-Scale Solar Energy Development

In December 2022, the BLM published a Notice of Intent to prepare a Programmatic EIS and amend resource management plans currently in place for six southwestern states. The amendment analysis added Idaho, Montana, Oregon, Washington, and Wyoming. The purpose of the action was to improve siting of utility-scale photovoltaic solar energy development. The plan impacts sage-grouse designated habitat throughout the west. A Final Programmatic Environmental Impact Statement and Proposed Resource Management Plan Amendment was published August 2024. A Record of Decision was signed December 27, 2024.

For conservation benchmarks between 1965 and 2023, see the Montana Sage Grouse Conservation Benchmarks document located on the Program website (https://sagegrouse.mt.gov/About#resources).

APPENDIX B

Montana Conservation Strategy: 2024 Implementation Chronology

March 2024

- March 7 MSGOT Meeting
  - The Program provided MSGOT with updates on:
    - the Fourth Cycle Grant projects and
    - and the launching of the 2024 HQT Basemap (v1.1).
  - The Program presented MSGOT with the 2023 Annual Report.

September 2024

- September 5 MSGOT Meeting
  - The Program provided a presentation: Habitat Quantification Tool – What Drives Your Score.

October 2024

- October 31 MSGOT Meeting
  - MSGOT hosted listening session/public comment opportunity.

December 2024

- December 13 MSGOT Meeting
  - MLR, TNC, and Program provided MSGOT with an overview of all conservation projects implemented using Stewardship Account funds and PRM conservation easements.

For implementation chronology between 2015 and 2023, see the Montana Sage Grouse Implementation Chronology document located on the Program website (https://sagegrouse.mt.gov/About#resources).