

## **Appendix A. Agency and Tribal Correspondence, IICEP and Section 106**



## EXAMPLE SCOPING LETTER

### DEPARTMENTS OF THE ARMY AND AIR FORCE

#### JOINT FORCE HEADQUARTERS - MONTANA

P.O. Box 4789, 1956 Mt Majo Street  
Fort Harrison, Montana 59636-4789

March 3, 2023

**SUBJECT:** Intergovernmental and Interagency Coordination of Environmental Planning in Support of an Environmental Assessment of the Montana Army National Guard's Proposed Billings Limited Army Aviation Support Facility

Mr. Chris Kukulski, City Administrator  
City of Billings  
210 North 27<sup>th</sup> Street  
Billings, MT 59101

Dear Mr. Kukulski:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) are preparing an Environmental Assessment (EA) to identify the environmental impacts associated with the construction, use and operation of the proposed Billings Limited Army Aviation Support Facility (LAASF). The proposed facility would be constructed at 3648 AJ Way, adjacent to the Billings Logan International Airport, Billings, Yellowstone County, Montana (see Figure 1 in Enclosure 1). The permanent presence of the LAASF would ensure the availability of aviation assets in eastern Montana, northern Wyoming, and western North and South Dakota and would allow MTARNG to continue to train aviation personnel in the region.

Generally, this action would include the construction of a 46,600 square-foot hangar that could house up to six (6) military helicopters. Additional infrastructure developed on the site would include a helicopter apron, underground storage tanks, security fencing, vehicle parking, and establishment of utilities.

The Billings LAASF would be supported by up to 14 full-time employees. Drill weekends would occur once a month, and up to 90 personnel would attend. Parking would be onsite in the vicinity of the hangar. Personnel who travel for drill weekends would lodge and dine in the Billings area. Training would take place on Friday evenings and all-day Saturday and Sunday. Transitional movements (arrival/departure) would occur at the hangar, and flights would occur within established airport traffic pattern areas or away from Billings' airspace.

As this Proposed Action is federally funded, we are preparing an EA that will evaluate the environmental, cultural, and socioeconomic impacts associated with the Proposed Action, pursuant to the National Environmental Policy Act (NEPA) of 1969, as

amended (42 U.S. Code [USC] §4321 *et seq.*); the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1600-1508); and Environmental Analysis of Army Actions; Final Rule, 29 March 2002 (32 CFR Part 651); as well as the Army National Guard NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969* (NGB, October 2011).

**Information Request:** While MTARNG maintains a wealth of current environmental, cultural, and socioeconomic data associated with the project location and vicinity, we are seeking your input on any specific environmental issues or concerns your agency may have. *Information your agency can provide on any of the following environmental issues (at or in the vicinity of the Proposed Action) would be appreciated:*

- Potential environmental concerns or issues;
- Surface- and ground-water resources, including streams, wetlands, floodplains, open water features, wells, and local aquifers;
- Federal- or state-listed threatened or endangered species, or any species proposed for such listing or critical habitat for such species that may occur within a one-mile radius around the proposed LAASF site;
- Parks, nature preserves, conservation areas, designated wild or scenic rivers, migratory bird habitats, or special wildlife issues;
- Natural resource issues;
- Cultural resources issues and/or Native American concerns;
- Pertinent soils and geologic data;
- Traffic, noise, or socioeconomic concerns;
- Land use or public health and safety concerns;
- Air quality concerns; and/or
- Additional environmental concerns or issues.

Data you make available will provide valuable and necessary input into the NEPA analytical process. As part of the NEPA process, local citizens, groups, and agencies, among others, will have ample future opportunity to review and comment on the information and alternatives addressed in the document.

**Other Agencies and Organizations:** A list of contacts to whom this request was sent is provided in Enclosure 2. *Should you know of any additional parties that may have data or concerns relevant to this Proposed Action, please forward them a copy of this letter, include their information in your response, or contact us directly with this information.*

We look forward to and welcome your participation in this analysis. **Please respond on or before April 4, 2023**, to enable us to complete this phase of the project within the scheduled timeframe. If you are not interested in this project and do not wish receive follow-up notices, please notify us by mail or e-mail, and we will remove you from our project mailing list.

**Please send your written response via regular mail or e-mail (preferred) to:**

Montana Army National Guard  
JFHQ-MT  
Attn: Environmental Office  
1956 Mt. Majo Street, P.O. Box 4789  
Fort Harrison, MT 59636-4789  
rebekah.l.myers2.nfg@mail.mil

POC for this action is Rebekah Myers at 406-324-3087. Thank you in advance for your participation in this process.

Sincerely,



Digitally signed by  
HRONEK.JOHN.PETER.II.11369  
71960  
Date: 2023.03.03 13:06:58 -07'00'

J. PETER HRONEK  
Major General, Montana National Guard  
The Adjutant General

Enclosures



**Enclosure 1**  
**Project Location**

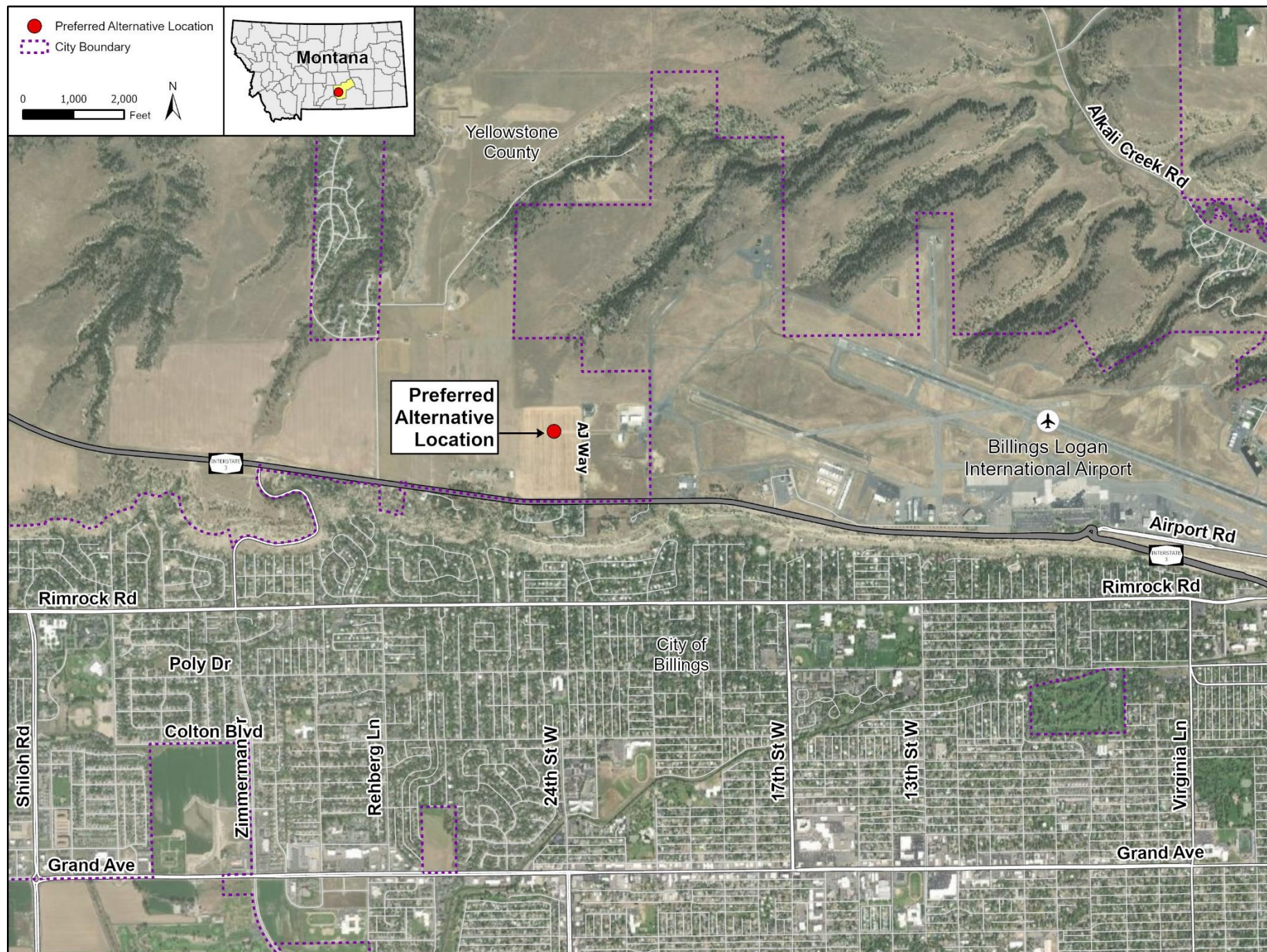


Figure 1. Project Location

**Enclosure 2**

**List of Parties Contacted**

### Federal Agencies

Montana Operations Region 8  
U.S. Environmental Protection Agency  
10 West 15<sup>th</sup> Street, Suite 3200  
Helena, MT 59626

Ms. Jodi Bush, Field Supervisor  
Ecological Services, Helena Field Office  
U.S. Fish and Wildlife Service  
585 Shepard Way, Suite 1  
Helena, MT 59601

Mr. Joe Nye  
Federal Aviation Administration  
Helena FSDO  
2725 Skyway Drive  
Helena, MT 59602-1213

US Army Corps of Engineers  
P.O. Box 7032  
Billings, MT 59103

### Tribes

Mr. Illiff Kipp Sr., Chairman  
Blackfeet Nation Tribe  
P.O. Box 850  
All Chiefs Square  
Browning, MT 59417

Mr. Floyd Azure, Chairman  
Fort Peck Assiniboine & Sioux Tribes  
P.O. Box 1027  
501 Medicine Bear Road  
Poplar, MT 59255

Ms. Shelly Fyant, Chairwoman  
Confederated Salish & Kootenai Tribes  
P.O. Box 278  
42487 Complex Boulevard  
Pablo, MT 59855

Mr. Frank Whiteclay, Chairman  
The Crow Tribe of Indians  
P.O. Box 19  
Bacheeitchche Avenue  
Crow Agency, MT 59022

Mr. Jeffrey Stiffarm, President  
Fort Belknap Indian Community  
656 Agency Main Street  
Harlem, MT 59526

Mr. Harlan Baker, Chairman  
Chippewa Cree Tribe  
P.O. Box 544  
Box Elder, MT 59521

Ms. Serena Wetherelt, President  
Northern Cheyenne Tribe  
P.O. Box 128  
600 Cheyenne Avenue  
Lame Deer, MT 59043

Mr. Gerald Gray, Chairman  
Little Shell Chippewa Tribe  
625 Central Avenue West  
Great Falls, MT 59401



### State Agencies

Ms. Amanda Kaster  
Montana Department of Natural Resources  
and Conservation  
1625 11<sup>th</sup> Avenue  
Helena, MT 59601

Mr. Malcom Long  
Montana Department of Transportation  
P.O. Box 211001  
Helena, MT 59620-1001

Mr. Chris Dorrington  
Montana Department of Environmental Quality  
1520 East Sixth Avenue  
Helena, MT 59620-0901

Mr. Peter Brown  
Montana State Historic Preservation Office  
1301 East Lockey Avenue  
Helena, MT 59620

Mr. Henry Worsech  
MT Department of Fish, Wildlife, and Parks  
1420 East Sixth Avenue  
Helena, MT 59620-0701

Mr. Tim Conway  
Montana Aeronautics Division  
P.O. Box 200507  
Helena, MT 59620-0507

### Local Agencies

Mr. Bill Cole, Mayor  
City of Billings  
210 North 27<sup>th</sup> Street  
Billings, MT 59101

Mr. Chris Kukulski, City Administrator  
City of Billings  
210 North 27<sup>th</sup> Street  
Billings, MT 59101

City Council  
City of Billings  
P.O. Box 1178  
Billings, MT 59103

Commissioner John Ostlund  
Yellowstone County Commission  
P.O. Box 35000  
Billings, MT 59107

Commissioner Donald Jones  
Yellowstone County Commission  
P.O. Box 35000  
Billings, MT 59107

Commissioner Denis Pitman  
Yellowstone County Commission  
P.O. Box 35000  
Billings, MT 59107

Airport Administration  
Billings Logan International Airport  
1901 Terminal Circle  
Billings, MT 59105

Big Sky Search and Rescue  
P.O. Box 160063  
Big Sky, MT 59716

Stillwater County Search and Rescue  
P.O. Box 729  
Columbus MT 59019

Carbon County Search and Rescue  
235 Upper Red Lodge Creek Road  
Red Lodge, MT 59068

Chief Pepper Valdez  
Billings Fire Department  
210 North 27<sup>th</sup> Street  
Billings, MT 59101

Chief Rich St. John  
Billings Police Department  
220 North 27<sup>th</sup> Street  
Billings, MT 59101

### Local Agencies (continued)

Sheriff Mike Linder  
Yellowstone County Sheriff's Office  
2323 2<sup>nd</sup> Ave North  
Billings, MT 59101

Sheriff Lawrence C. Big Hair  
Bighorn County Sheriff's Office  
121 3<sup>rd</sup> Street West  
Hardin, MT 59034

Sheriff Josh McQuillan  
Carbon County Sheriff's Office  
102 Broadway Avenue North  
Red Lodge, MT 59068

Sheriff Wayne Robinson  
Treasure County Sheriff's Office  
307 Rapelje Avenue  
Hysham, MT 59038

Sheriff Shawn Lesnik  
Musselshell County Sheriff's Office  
820 Main Street  
Roundup, MT 59072

Sheriff Charles Kem  
Stillwater County Sheriff's Office  
400 East 3<sup>rd</sup> Avenue North  
Columbus, MT 59109

Sheriff Robert Pallas  
Golden Valley Sheriff's Office  
107 Kemp Street  
Ryegate, MT 59074

Captain Philip Schmidt  
Civil Air Patrol  
P.O. Box 1887  
Great Falls, MT 59403

## Myers, Rebekah L NFG NG MTARNG (USA)

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**From:** Martin, Jacob <jacob\_martin@fws.gov>  
**Sent:** Thursday, March 9, 2023 3:01 PM  
**To:** rebekah.l.myers2.nfg@mail.mil  
**Subject:** Montana Army National Guard's Proposed Limited Army Aviation Support Facility

Dear General Hronek:

Thank you for your March 3, 2023, letter requesting U.S. Fish and Wildlife Service comment on the proposed subject project in Billings, Yellowstone County, Montana. The project would involve construction of a 46,600 square-foot hangar and associated infrastructure on vacant land near the Billings Logan International Airport, as detailed in your letter.

This email represents our official response to your inquiry for your records.

The U.S. Fish and Wildlife Service reviewed the project description and has no comments regarding federally listed or proposed threatened or endangered species or other trust species. Additional information on specific locations may be obtained using the IPaC project-planning tool at <https://ecos.fws.gov/ipac/>.

Thank you for the opportunity to comment. If you have any questions or comments about this correspondence, please contact me via reply email or at the address or phone numbers below.

Sincerely,

Jacob M. (Jake) Martin  
Deputy Field Supervisor  
Montana Ecological Services Office  
585 Shephard Way, Suite 1  
Helena, Montana 59601  
(406) 422-8524 (cell, preferred, I'm probably teleworking)  
(406) 430-9007 (office)  
jacob\_martin@fws.gov

## Myers, Rebekah L NFG NG MTARNG (USA)

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**From:** Mike Linder <mlinder@yellowstonecountymt.gov>  
**Sent:** Tuesday, March 14, 2023 2:49 PM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA)  
**Subject:** [Non-DoD Source] LAASF Billings MT

Ms. Myers,

Having already been to several of the meetings associated with this project, I feel confident that the Army is doing a wonderful job in addressing any concerns that I might have. So on behalf of the Yellowstone County Sheriff's Office, we support this project fully, and we look forward to working with those who will be stationed here full time, as well as those who will come to our community for training.

Please feel free to contact me if I can be of any assistance.

Sincerely,  
Mike

Sheriff Mike Linder  
Yellowstone County Sheriff's Office  
2323 2nd Ave. North  
Billings, MT. 59101

406-256-2929

**NEW EMAIL ADDRESS**

[mlinder@yellowstonecountymt.gov](mailto:mlinder@yellowstonecountymt.gov)



## Myers, Rebekah L NFG NG MTARNG (USA)

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**From:** Evilsizer, Laura <Laura.Evilsizer@mt.gov>  
**Sent:** Tuesday, March 21, 2023 3:43 PM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA)  
**Subject:** [Non-DoD Source] Billings Limited Army Aviation Support Facility EA

Rebekah,

I received the letter from Major General Hronek regarding the NEPA process for the Limited Army Aviation Support Facility (LAASF) in Billings. I don't have specific information to share on cultural resources. The consultation last year (SHPO Project number 2022041905) in a letter sent to us April 13, 2022 on the Limited Army Aviation Support Facility in Billings is a summary of identified cultural resources for that area. If you need a specific inventory recommendation request or want to learn about any newly recorded sites since that time you can use our standard File Search procedure. (<https://mhs.mt.gov/Shpo/CulturalRecords>)

Laura Evilsizer  
Compliance Officer, Archaeologist, Deputy SHPO  
Montana Historical Society, State Historic Preservation Office  
406-444-7719 (office)  
[Laura.Evilsizer@mt.gov](mailto:Laura.Evilsizer@mt.gov)  
[mhs.mt.gov](https://mhs.mt.gov)

*The Montana Historical Society saves Montana's past, shares our stories, and inspires exploration, to provide meaning for today and vision for tomorrow.*



## Myers, Rebekah L NFG NG MTARNG (USA)

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**From:** Roach, Jeff <RoachJ@billingsmt.gov>  
**Sent:** Tuesday, March 28, 2023 12:32 PM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA)  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] Montana Army National Guard (MTARNG) Billings Limited AASF Scoping Document  
**Attachments:** MTARNG EA Comments - BIL\_PCSD.docx

Ms. Myers,

Please see the attached comments on the Montana Army National Guard (MTARNG) Billings Limited AASF environmental scoping document. Billings Logan International Airport (BIL) and the City of Billings Planning Department comments are included. Feel free to contact me with any questions.

Regards,

Jeff



**Jeff Roach, A.A.E.**  
Director, Aviation and Transit  
[roachj@billingsmt.gov](mailto:roachj@billingsmt.gov)



1901 Terminal Circle, Ste 216  
Billings, MT 59105  
P 406.657.8484

[www.flybillings.com](http://www.flybillings.com)

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Please send your written response via regular mail or e-mail (preferred) to:

Montana Army National Guard  
JFHQ-MT  
Attn: Environmental Office  
1956 Mt. Majo Street, P.O. Box 4789  
Fort Harrison, MT 59636-4789  
[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)

The Billings Logan International Airport (BIL) has the following comments on the potential environmental impacts of the Montana Army National Guard (MTARNG) Billings Limited AASF.

1) Correct the Project Location Map (Figure 1) BIL airport boundary adjacent to the property with the proposed development. The red lines are the current airport boundary. Additionally, change the legend to read "Airport Boundary (BIL)".

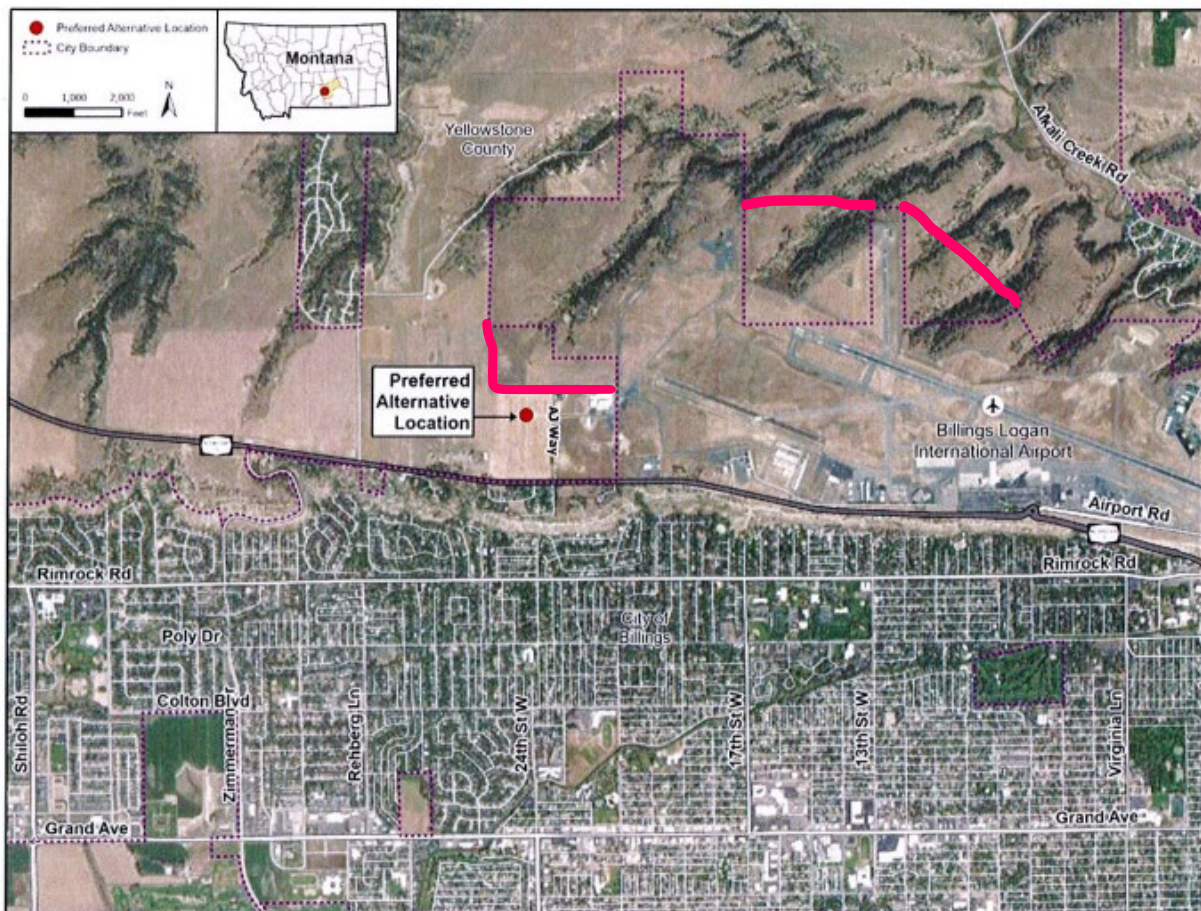


Figure 1. Project Location

2) Noise impacts should be anticipated from additional helicopter operations, particularly during nighttime operations (10:00 pm – 6:00 am). The airport expects the MTARNG to respond to noise complaints associated with military helicopter activity in the vicinity of BIL and to adhere to “Fly Friendly” procedures in the vicinity of BIL to reduce the potential impact of aircraft generated noise on the public.

3) The airport anticipates the demand for the MTARNG to seek a stormwater easement for the proposed project. Adjacent properties near the proposed MTARNG development have received a stormwater easement to facilitate the movement of stormwater to the North, which has been the desired direction for excess stormwater flow. BIL will work with the MTARNG project development team to best site the easement and facilitate the easement acquisition process.

The Billings Planning and Community Services Department (PCSD) has the following comments on the potential environmental impacts of the Montana Army National Guard (MTARNG) Billings Limited AASF.

1) PCSD shares the same comment noted by the BIL in #2 above that noise impacts should be anticipated from additional helicopter operations. The PCSD and its Code Enforcement Division expects the MTARNG to respond to noise complaints associated with military helicopter activity in the vicinity of BIL and to adhere to “Fly Friendly” procedures in the vicinity of BIL to reduce the potential impact of aircraft generated noise on the public.

2) The property where the Limited AASF facility is to be located is all or partially outside the current Billings City Limits and portions of the property are currently zoned for agricultural operations. PCSD has had discussions with the MTARNG project staff and expects annexation of the property into the City will occur to access City services before any development of the site. PCSD also expects that the zoning of the property will be changed to fit the uses of the Limited AASF.

3) As part of any development plan for the Limited AASF, PCSD and City of Billings Public Works/Engineering will also coordinate with MTARNG and its consultant team on traffic impacts, up to and including the need for a Traffic Impacts Study for the facility and its ingress and egress onto Highway 3. The Montana Department of Transportation also has jurisdiction on Highway 3 and is expected to participate with Billings in any traffic impact assessment and review.

**Shelton, Nancy**

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**Subject:** NEPA-MTARNG-LAASF Yellowstone Project

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**From:** Teanna Limpy <[teanna.limpy@cheyennenation.com](mailto:teanna.limpy@cheyennenation.com)>  
**Sent:** Tuesday, April 4, 2023 10:38 AM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA) <[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)>  
**Subject:** [Non-DoD Source] NEPA-MTARNG-LAASF Yellowstone Project

Ms. Myers,

Thank you for the notification letter regarding the development of the forthcoming environmental assessment for the proposed Billings Limited Army Aviation Support Facility(LAASF) near Billings Logan International Airport, Billings, MT. As for the cultural resources, can you provide me with information regarding the currently proposed actions regarding cultural resource management initiatives surrounding this project? Will there be opportunity for pedestrian survey work with participation from our tribe, perhaps when the weather gets better? Also, if you could, please send me any pertinent literature from previous cultural surveys conducted within .25mi of the project area.

Thanks,

*Teanna Limpy, Director  
Tribal Historic Preservation Office  
Northern Cheyenne Tribe  
14 E. Medicine Lodge Drive  
PO Box 128  
Lame Deer, MT. 59043  
Office: 406-477-4838/8113  
Direct: 406-477-4839  
Work Cell: 406-740-0420*

## Myers, Rebekah L NFG NG MTARNG (USA)

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**From:** Teanna Limpy <teanna.limpy@cheyennenation.com>  
**Sent:** Wednesday, May 10, 2023 5:35 PM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA)  
**Subject:** RE: [Non-DoD Source] NEPA-MTARNG-LAASF Yellowstone Project

Ms. Myers:

Thank you for providing the additional information requested. Based on the additional information provided, the Northern Cheyenne THPO has no further comments and/or concerns regarding this project. Otherwise, please let our office know if a formal determination is requested from your agency.

Thanks,

*Teanna Limpy, Director  
Tribal Historic Preservation Office  
Northern Cheyenne Tribe  
14 E. Medicine Lodge Drive  
PO Box 128  
Lame Deer, MT. 59043  
Office: 406-477-4838/8113  
Direct: 406-477-4839  
Work Cell: 406-740-0420*

---

**From:** Myers, Rebekah L NFG NG MTARNG (USA) [mailto:rebekah.l.myers2.nfg@army.mil]  
**Sent:** Tuesday, April 04, 2023 12:11 PM  
**To:** Teanna Limpy <teanna.limpy@cheyennenation.com>  
**Subject:** RE: [Non-DoD Source] NEPA-MTARNG-LAASF Yellowstone Project

Hi Teanna -

Thank you for your interest in the project. I know you have provided comment previously regarding the area. Attached is the Cultural Resource Investigation of the land that was completed in 2021 prior to when the Department of Military Affairs purchased the property.

Please let me know if you have any questions.

Thank you  
Becky

Becky Myers  
Environmental Bureau Chief  
CFMO  
Montana Department of Military Affairs  
[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)  
406-324-3087

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**From:** Teanna Limpy <[teanna.limpy@cheyennenation.com](mailto:teanna.limpy@cheyennenation.com)>  
**Sent:** Tuesday, April 4, 2023 10:38 AM  
**To:** Myers, Rebekah L NFG NG MTARNG (USA) <[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)>  
**Subject:** [Non-DoD Source] NEPA-MTARNG-LAASF Yellowstone Project

Ms. Myers,

Thank you for the notification letter regarding the development of the forthcoming environmental assessment for the proposed Billings Limited Army Aviation Support Facility(LAASF) near Billings Logan International Airport, Billings, MT. As for the cultural resources, can you provide me with information regarding the currently proposed actions regarding cultural resource management initiatives surrounding this project? Will there be opportunity for pedestrian survey work with participation from our tribe, perhaps when the weather gets better? Also, if you could, please send me any pertinent literature from previous cultural surveys conducted within .25mi of the project area.

Thanks,

***Teanna Limpy, Director  
Tribal Historic Preservation Office  
Northern Cheyenne Tribe  
14 E. Medicine Lodge Drive  
PO Box 128  
Lame Deer, MT. 59043  
Office: 406-477-4838/8113  
Direct: 406-477-4839  
Work Cell: 406-740-0420***





## EXAMPLE SECTION 106 CONSULTATION LETTER

### DEPARTMENTS OF THE ARMY AND AIR FORCE

#### JOINT FORCE HEADQUARTERS - MONTANA

P.O. Box 4789, 1956 Mt Majo Street  
Fort Harrison, Montana 59636-4789

October 6, 2023

SUBJECT: Continuing National Historic Preservation Act Consultation for the Development and Operation of the Proposed Limited Army Aviation Support Facility, Billings, Montana

Mr. Peter Brown  
Montana State Historic Preservation Office  
1301 East Lockey Avenue  
Helena, MT 59620

Dear Mr. Brown:

The Montana Army National Guard (MTARNG) proposes to operate a Limited Army Aviation Support Facility (LAASF) from a hangar that MTARNG currently leases in Billings, Yellowstone County, Montana (Enclosure 1). The operation of the proposed LAASF qualifies as an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (*54 USC 306108, implementing regulations at 36 CFR Part 800*). The undertaking is also subject to the National Environmental Policy Act of 1969 (NEPA) (*42 United States Code [USC] 4321 et seq.*), and the National Guard Bureau (NGB) and MTARNG are preparing a Draft Environmental Assessment (EA) in accordance with NEPA, the Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (*40 Code of Federal Regulations [CFR] Parts 1500-1508*), and *32 CFR Part 651 (Environmental Analysis of Army Actions, Final Rule)*. The NGB, as the lead federal agency, and MTARNG intend to complete Section 106 consultation in conjunction with the NEPA process.

#### Summary of Previous Section 106 Consultation

Previous Section 106 consultation was conducted with your office on the adequacy of an intensive pedestrian survey report for a land transfer, establishment of a direct area of potential effects (APE) and a project finding of *no adverse effect*. Concurrence was received on June 8, 2021 (L. Evilsizer SHPO to A. Johnson MTARNG).

An additional round of Section 106 consultation was conducted with your office and provided an assessment of potential indirect visual and auditory effects of helicopter overflight within an indirect APE. A continued project finding of *no adverse effect* was determined for the indirect APE. Concurrence from your office on the indirect APE and the



continued project finding of *no adverse indirect effect to historic properties* was received on 27 April 2022 (L. Evilsizer SHPO to A. Johnson MTARNG).

### **Continuing Section 106 Consultation**

Since the time of the initial consultation, MTARNG has identified areas where additional ground disturbance would be required to construct critical project elements. The project's direct APE has been expanded to include these areas (Enclosure 2). These are referred to as "Additional APE Areas".

### **Direct APE Definition**

The Additional APE Areas consists of the area where ground disturbance associated with the construction of a drainage easement and a helipad would occur, and the location of two clear zones. The Additional APE Areas consist of 7.47 acres and include:

- A linear alignment and parcel for a drainage easement,
- A parcel for a helipad area, and
- Two clear zone parcels, one directly east and one directly west of the helipad parcel.

The Additional APE Areas consist of City of Billings and MTARNG land. They are located within a portion of Township 1 North, Range 25 East, Section 26 as depicted on the United States Geological Survey (USGS) Billings West 7.5-minute topographic quadrangle.

### **Cultural Resources Background Research and Pedestrian Survey**

On behalf of MTARNG, Jacobs Engineering Group Inc. (Jacobs) conducted background research and an intensive pedestrian cultural resources survey of the Additional APE Areas. The results of the background research and intensive pedestrian cultural resources survey are presented in the enclosed report, entitled "*Cultural Resources Investigations for a Proposed Montana Army National Guard Limited Army Aviation Support Facility Drainage Easement, Helipad, and Clear Zones, Near Billings Logan International Airport, Billings, Yellowstone County, Montana*" by Walter R. Punzmann. The report is enclosed for your review and comment (Enclosure 3).

### **Results of the Cultural Resources Background Research and Pedestrian Survey**

No previously recorded cultural resources sites or historic properties were identified in the Additional APE Areas by the background research. During the intensive pedestrian survey, one newly recorded cultural resources site, designated as 24YL2488, was identified.

**24YL2488** is a surficial Late Historic (ca. 1940s–1960s) artifact scatter consisting of household trash. It is located entirely within the drainage easement parcel at the northern

extent of the drainage easement parcel of the Additional APE Areas. Artifacts primarily consist of clear bottle and jar glass fragments, window glass, and metal cans and can fragments. Other artifacts include green and brown bottle glass fragments, miscellaneous metal items, whiteware dish fragments, Bakelite fragments, and asbestos tile fragments. Diagnostic artifacts (bottle maker's marks and bottle designs) suggest a 1940–1960-time range. All artifacts were inventoried by the field recording. No features were identified.

### **Determination of NRHP Eligibility**

**24YL2488** possesses integrity of location, materials, and setting, as the artifacts are in primary deposition and the vicinity generally has likely not changed since the time the household trash was deposited. However, the site lacks integrity of design, workmanship, feeling, and association. It is a surficial, single-episode deposit of household trash deposition that likely occurred sometime in the late 1940s to 1960s. While it is located within 800 meters of ranching features previously recorded as 24YL1679 (an NRHP-ineligible site), it does not demonstrate direct association with those features or the families that owned them.

As a result, 24YL2488 cannot be definitively associated with any important events (Criterion A) or persons (Criterion B). The site is a single-episode deposit of household trash that does not demonstrate any unique qualities of design or construction (Criterion C). Mapping and recording of this site have exhausted its information potential (Criterion D). Therefore, NGB and MTARNG has determined that 24YL2488 is ineligible for inclusion in the NRHP.

### **Determination of Project Effect**

Based on the results of the background research and intensive pedestrian survey, and continued project finding of *no adverse effect* is still applicable.

### **Request for Concurrence**

NGB and MTARNG asks that you share your initial comments regarding any known architectural, archaeological, tribal, or other historic properties that may be in the Additional APE Areas and any comments you may have regarding the Additional APE Areas. Further, we are requesting your concurrence on the adequacy of the project survey report, the determination of NRHP ineligibility for 24YL2488, and a continued project finding of "*no adverse effect*".

We request that you provide your responses within thirty (30) days, or by November 5, 2023, per 36 CFR 800.4(d)(1)(i). If no response is received, we will assume that you concur with our finding of project effect and will proceed with this undertaking. If you have any questions about this project, please contact Rebekah Myers at 406-324-3087 or [rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil).

Sincerely,

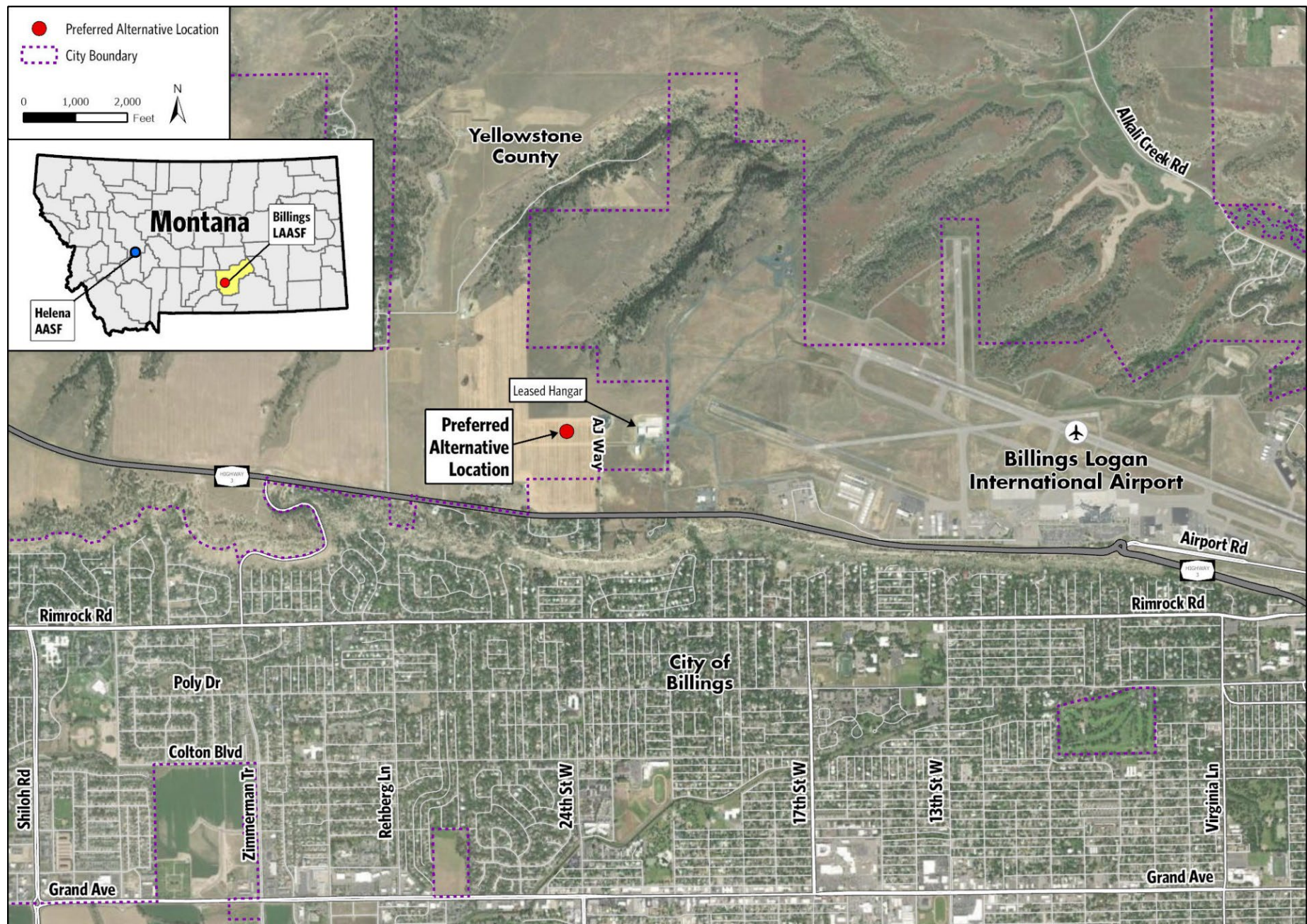
A handwritten signature in black ink, appearing to read "Rebekah Myers", written in a cursive style.

Rebekah Myers

Environmental Program Manager

**Enclosure 1**  
**Project Location**



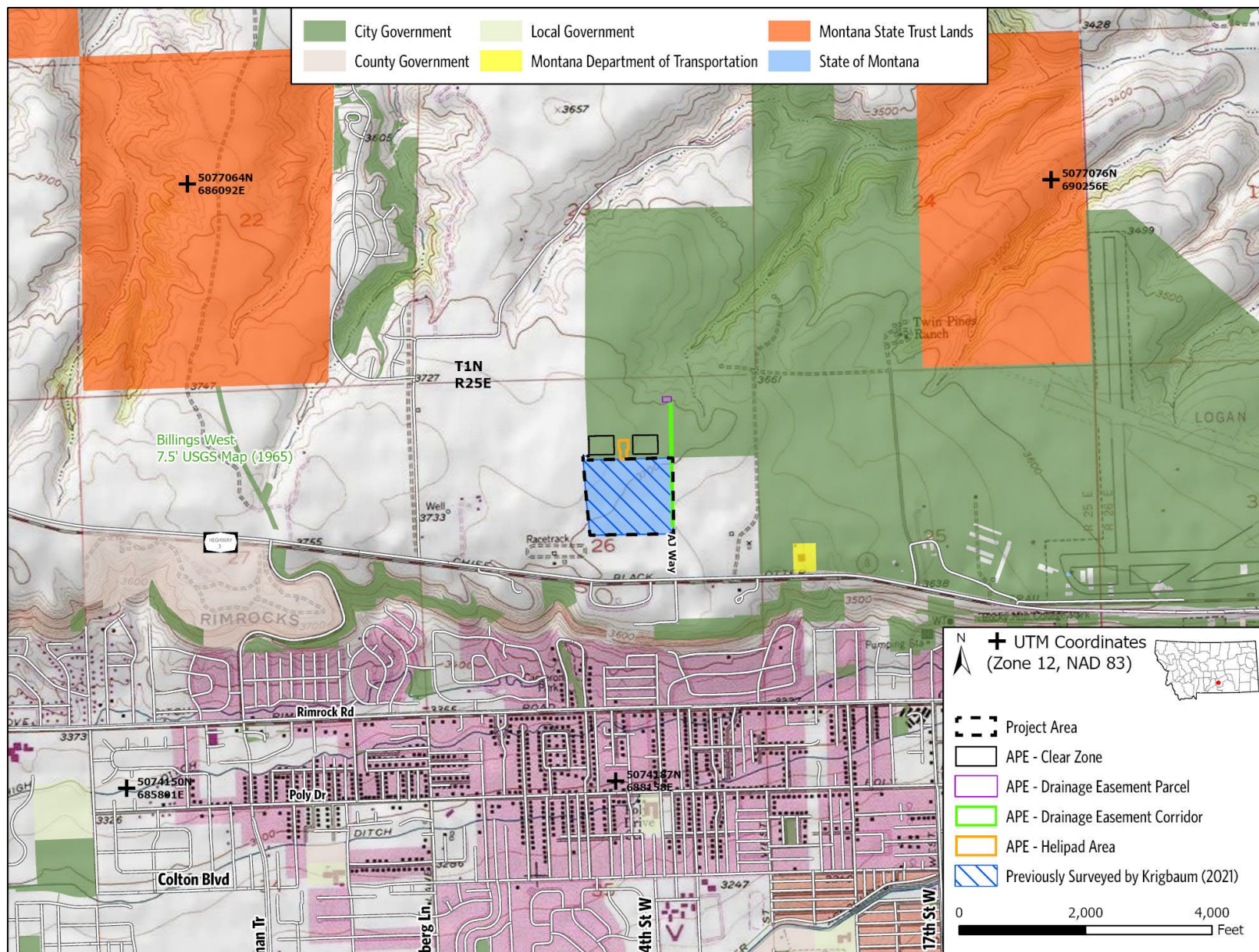


Enclosure 1. Project Location

**Enclosure 2**

**Direct APE**





## Enclosure 2. Direct APE Location

**Enclosure 3**

***Cultural Resource Investigations for the Proposed Montana Army National Guard  
Limited Army Aviation Support Facility Drainage Easement, Helipad, and Clear  
Zones, Near Billings Logan International Airport, Billings, Yellowstone County,  
Montana, October 2023***





Montana State Historic Preservation Office  
225 N. Roberts Ave.  
P.O. Box 201201  
Helena, MT 59620-1201  
406-444-7715

October 17, 2023

Rebekah Myers  
Joint Force Headquarters – Montana  
PO Box 4789  
1956 Mt. Majo St.  
Ft. Harrison, MT 59636-4789

Ref: Continuing NHPA Consultation for Proposed Limited Army Aviation Support Facility, Billings

Dear Ms. Myers:

Thank you for re-opening the Section 106 process and inviting the Montana State Historic Preservation Office (SHPO) an opportunity to comment. SHPO knows of no additional cultural resources in the Additional APE Areas; we concur on the adequacy of the project survey report and concur with the Montana Army National Guard's determination of NRHP ineligibility for 24YL2488, which is a collection of household trash items from between 1940 and the 1960s. As such, SHPO continues to concur with MTARNG that this undertaking would have no adverse effect on National Register properties.

Please submit an **electronic copy of the report with a Report Metadata Form** through SHPO's file submittal portal. Please also notify me by email when you submit these two items.

Thank you for consulting with us.

Sincerely,

Pete Brown  
State Historic Preservation Officer

File: DOD-MTARNG-2023-2023100608

**From:** [Dyan Youpee](#)  
**To:** [Myers, Rebekah L NFG NG MTARNG \(USA\)](#)  
**Cc:** [Justin Gray Hawk](#)  
**Subject:** [Non-DoD Source] Re: Follow-up to Correspondence: Billings LAASF Environmental Assessment - [UNCLASSIFIED - 2023-11-28T22:20:55.806Z]  
**Date:** Friday, January 5, 2024 9:45:25 AM

---

Rebekah,

Re: NHPA Consultation for the Development and Operation of the Proposed Limited Army Aviation Support Facility, Billings, Montana

Thank you for your request to comment and providing necessary documents to complete our cultural review. After careful review of the proposed undertaking, this project will not have an adverse effect on historic or cultural properties significant to the Fort Peck Assiniboine and Sioux Tribes. Determination is based on no findings of recorded historical or archaeological sites, or projects proposing minimal impacts to those findings. If the project must change to impact those properties, so will the Tribal Historic Preservation Office's concurrence to this project. All drastic modifications to the project must conduct an on-site visitation with the Tribal Historic Preservation Officer. Should there be any updates to the proposed activities (other than listed on the review request) or unanticipated inadvertent discoveries (human remains, indigenous artifacts, burial items), contact the T.H.P.O. with discoveries or new information regarding further disturbances other than proposed.

Should a neighboring Tribe oppose the project due to their tribal concerns, the Fort Peck Tribes will support that Tribes' concerns until a mitigation decision is reached. I thank you for reaching out to the Fort Peck Tribes.

(Please include our Tribal Chairman, Mr. Justin Gray Hawk, Cc'd, on future federal undertakings. Thank you.)

Respectfully,

On Tue, Nov 28, 2023 at 3:21 PM Myers, Rebekah L NFG NG MTARNG (USA) <[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)> wrote:

**UNCLASSIFIED**

Good afternoon Ms. Youpee –

The Montana Army National Guard is proposing to construct a Limited Army Aviation Support Facility on a 40-acre parcel in Billings, Yellowstone County, Montana. The constructed facility will serve as the home for the 1-189<sup>th</sup> General Support Aviation Battalion (GSAB). Currently, the 1-189<sup>th</sup> GSAB operates out of a leased hangar east of the

proposed site in Billings.

On October 6, 2023, the Montana Army National Guard submitted the attached letter and documentation to your office for review and comment. The letter includes a description of the undertaking, area of potential effect (APE), and a discussion on the results of the cultural resource surveys.

There have been two (2) investigations conducted as part of this proposal. The first investigation was a Class III cultural resource inventory of 138 acres (referred to as the Original APE). This Class III cultural resource inventory was conducted in 2021 as part of a state land purchase. It is included in Enclosure 3 of the attached packet. The second investigation was conducted on 7.47 acres (referred to as the Additional APE). This investigation was conducted as part of the proposed construction for the permanent facility. It is included in Enclosure 4 of the attached packet.

I am reaching out to you because we have not received a response. Please let me know if you have any comments regarding the proposed activity or the attachments.

Thank you.  
Becky

Becky Myers  
Environmental Bureau Chief  
CFMO  
Montana Department of Military Affairs  
[rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)  
406-324-3087

**UNCLASSIFIED**

--

**Ms. Dyan Youpee - T.H.P.O.**

**Cultural Resource Director**

Fort Peck Assiniboine & Sioux Tribes  
501 Medicine Bear Rd, P.O. Box 1027  
Poplar Montana, 59255

O: 406-768-2382

*'This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the Fort Peck Tribes. Finally, the recipient should check this email and any attachments for the presence of viruses. The FPT accepts no liability for any damage caused by any virus transmitted by this email.'*



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Gerald Gray, Chairman  
Little Shell Chippewa Tribe  
625 Central Avenue West  
Great Falls, MT 59401

Dear Chairman Gray:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

A 15-day comment period will begin February 25, 2024 and end March 11, 2024. Comments on the final EA should be submitted no later than March 11, 2024. A copy of the final EA and draft FONSI is available for download at <https://dma.mt.gov/CFMO/index> or can be provided upon request. Written comments can be submitted to [rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil) or sent to JFHQ-MT, Attn: Environmental/Rebekah Myers, 1956 Mt Majo Street, PO Box 4789, Fort Harrison, MT 59636-4789.

We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Ms. Serena Wetherelt, President  
Northern Cheyenne Tribe  
P.O. Box 128  
600 Cheyenne Avenue  
Lame Deer, MT 59043

Dear President Wetherelt:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

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REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Tom McDonald, Chairman  
Confederated Salish & Kootenai Tribes  
P.O. Box 278  
42487 Complex Boulevard  
Pablo, MT 59855

Dear Chairman McDonald:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Illiff Kipp Sr., Chairman  
Blackfeet Nation Tribe  
P.O. Box 850  
All Chiefs Square  
Browning, MT 59417

Dear Chairman Kipp:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs





## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Harlan Gopher Baker, Chairman  
Chippewa Cree Tribe  
31 Agency Square, Box 544  
Box Elder, MT 59521

Dear Chairman Baker:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

A 15-day comment period will begin February 25, 2024 and end March 11, 2024. Comments on the final EA should be submitted no later than March 11, 2024. A copy of the final EA and draft FONSI is available for download at <https://dma.mt.gov/CFMO/index> or can be provided upon request. Written comments can be submitted to [rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil) or sent to JFHQ-MT, Attn: Environmental/Rebekah Myers, 1956 Mt Majo Street, PO Box 4789, Fort Harrison, MT 59636-4789.

We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Frank White Clay, Chairman  
The Crow Tribe of Indians  
P.O. Box 19  
Bacheeitchche Avenue  
Crow Agency, MT 59022

Dear Chairman White Clay:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Jeffrey Stiffarm, President  
Fort Belknap Indian Community  
656 Agency Main Street  
Harlem, MT 59526

Dear President Stiffarm:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in cursive script, reading "Rebekah Myers", is positioned above the printed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs



## DEPARTMENTS OF THE ARMY AND AIR FORCE

### JOINT FORCE HEADQUARTERS - MONTANA

1956 Mt Majo Street (P.O. Box 4789)  
Fort Harrison, Montana 59636-4789

21 February 2024

SUBJECT: Public Comment Period for Final Environmental Assessment and Draft Finding of No Significant Impact for Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Mr. Justin Gray Hawk Sr., Chairman  
Fort Peck Assiniboine & Sioux Tribes  
P.O. Box 1027  
501 Medicine Bear Road  
Poplar, MT 59255

Dear Chairman Gray Hawk Sr.:

The National Guard Bureau (NGB) and Montana Army National Guard (MTARNG) have prepared a final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) to identify the environmental impacts associated with the construction and operation of a proposed Limited Army Aviation Support Facility (LAASF) in Billings, Montana. The proposed facility would be located adjacent to the Billings Logan International Airport on state-owned land. The permanent LAASF will provide larger and better equipped training facilities for the Montana Army National Guard (MTARNG), secure helicopter storage, and adequate security features and setbacks.

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We appreciate your time and consideration. If you have any questions, please reach out to me at my email above or 406-324-3087. Thank you.

FOR THE MTARNG CFMO:

A handwritten signature in black ink, reading "Rebekah Myers", is positioned above the typed name.

REBEKAH MYERS  
Environmental Program Manager  
Montana Department of Military Affairs

## Appendix B. Public Notification



## Notice of Availability

**Montana Army National Guard (MTARNG) announces the availability of the  
Final Environmental Assessment (EA) and  
Draft Finding of No Significant Impact (FONSI) for the  
Billings Limited Army Aviation Support Facility**

The MTARNG proposes to construct a permanent Limited Army Aviation Support Facility, including training buildings, a hangar, and apron adjacent to the Billings Logan International Airport in Billings, MT in Yellowstone County. The purpose of the Proposed Action is to provide a government-owned permanent facility that provides adequate long-term training and classroom facilities, has secure storage and apron to accommodate up to six helicopters, meets minimum antiterrorism/force protection (AT/FP) measures, and is in compliance with National Guard and Department of Defense requirements.

The Final EA and Draft FONSI are available for public review and comment and can be accessed online at: <https://dma.mt.gov/CFMO/index>, upon request (406-324-3087 or [rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil)), or at the Billings Public Library, 510 N. Broadway, Billings, MT 59101.

Comments will be accepted from February 25, 2024 through March 11, 2024, per 32 CFR Part 651.14. Provide comments via email to [rebekah.l.myers2.nfg@army.mil](mailto:rebekah.l.myers2.nfg@army.mil) or postal mail to Rebekah Myers, DMA Environmental Bureau, JFHQ-MT, P.O. Box 4789, 1956 Mt. Majo Street, Fort Harrison, MT 59636-4789

All persons, organizations having potential interest in the Proposed Action, including minority, low income, disadvantaged communities, are urged to participate in the NEPA environmental analysis process.

## Appendix C. Comparison of AASF to LAASF



	Leased Hangar	Permanent LAASF	Helena AASF
Washing helicopters	Prohibited at current location; helicopters are flown to Helena for washes/engine washes and inspection windows extended	Washrack for washing helicopters will be available and connected to oil/water separator and city sewer.	Washrack for washing helicopters is available and connected to oil/water separator, sewer.
Fueling	No permanent fuel farm available.	Permanent fuel farm (two 10,000-gallon USTs)	Permanent fuel farm (two 25,000-gallon USTs)
Secondary containment	No permanent secondary containment.	Permanent secondary containment for HEMMTs stored on-site.	Permanent secondary containment for HEMMTs stored on-site.
Field level maintenance / PMCS	Able to complete all necessary field level maintenance / PMCS.	Able to complete all necessary field level maintenance / PMCS.	Able to complete all necessary field level maintenance / PMCS.
Specialty maintenance	No ability to complete specialty maintenance.	Limited specialty maintenance completed. Will not have full back shop capability, but will have avionics and as needed engine/sheet metal/ rotor repair.	Specialty maintenance completed; included engine repair/replacement; in-depth scheduled maintenance; sheet metal repair; rotor repair; powertrain repair. RAPSC Contract Phase lines (1ea 60, 1ea 47)
Number of aircraft	Limited to size of hangar (four helicopters inside).	Will be able to accommodate up to six (6) helicopters.	Able to accommodate number of helicopters assigned to the MTARNG.
Hazardous Waste Facility	No hazardous waste storage on site.	Hazardous waste storage on site.	Hazardous waste storage on site.
POL Storage Room	No POL storage room on site. Only flam lockers in hangar	POL storage room on site.	POL storage room on site.
Administrative Spaces	Limited Administrative spaces on site in rented construction trailers. Space shared by flight ops, instructor and maint pilots, LAASF commander. A CO. AGR personnel have office space at BAFRC (off-site).	Administrative spaces authorized.	Additional administrative spaces authorized (flight instructor).
Safety Office Space	No safety office space. Shared space for Safety Office.	Safety space authorized. Dedicated space for Safety Office.	Safety space authorized. Dedicated space for Safety Office.
Learning Center	No learning center.	Not an authorized space.	Authorized space. Dedicated space for Learning Center.
Operations Spaces	Limited operations spaces on site in rented construction trailers. Space shared by flight ops, instructor and maint pilots, LAASF commander	Operations spaces authorized.	Additional operations spaces authorized (passenger waiting, flight surgeon).

## Appendix D. Noise Analysis

## **Appendix E. Air Quality Tables and Record of No Applicability**

# Air Emission Calculations

$$Emissions_P = T_{E,M} * FFR_{E,M} * EF_{P,E,M} * N_a$$

Where,

$Emissions_P$  = Emissions of each pollutant  
 $T_{E,M}$  = Operating Time for each engine and mode  
 $FFR_{E,M}$  = Fuel Flow Rate for each engine and mode  
 $EF_{P,E,M}$  = Emission Factor for each pollutant, engine and mode  
 $N_a$  = Number of engines for each aircraft

## Summary Tables

Table 1. LAASF Annual Emissions and General Conformity De Minimis Thresholds (tons/year)

	NO <sub>x</sub>	SO <sub>x</sub>	CO	VOC	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub> e
Total Steady State Emissions	2.4	0.17	3.0	0.32	0.46	0.41	1,104 (968.87) <sup>1</sup>
General Conformity Threshold	100	100	100	100	100	100	25,000 <sup>2</sup>
1. Metric Tons 2. There are no De Minimis threshold for GHGs; however, facilities that emit 25,000 metric tons/year or more are required to report emissions data per 40 CFR Part 98.							

Table 2. Criteria Pollutant Emissions by Activity (tons/year)

Activity	NO <sub>x</sub>	SO <sub>x</sub>	CO	VOC	PM <sub>10</sub>	PM <sub>2.5</sub>
CH-47 Landing/Take-Off (LTO)	0.39	3.00E-02	0.47	0.17	0.09	0.08
CH-47 Low Flight Pattern (LFP)	0.83	5.00E-02	0.1	0.03	0.14	0.12
CH-47 Run Up	0.08	0.01	0.04	0.02	0.01	0.01
UH-72 LTO	0.04	1.00E-02	0.92	0.05	0.05	0.05
UH-72 LFP	0.05	1.00E-02	0.35	0.03	0.04	0.04
UH-72 Run Up	0.05	0.01	0.09	0.02	0.004	0.004
UH-60 LTO	0.19	1.00E-02	0.25	-	0.04	0.03
UH-60 LFP	0.42	2.00E-02	0.13	-	0.08	0.07
UH-60 Auxiliary Power Unit (APU)	0.06	2.00E-02	0.58	-	-	-
UH-60 Run Up	0.03	0.003	0.02	0.0002	0.01	0.004
HEMMT	1.3E-03	3.2E-06	4.7E-04	1.E3-04	3.4E-05	3.1E-05
LMTV	2.0E-04	2.0E-06	4.6E-04	1.4E-04	4.0E-06	4.0E-06
HMMWV	1.6E-04	1.6E-06	1.8E-03	1.1E-04	3.2E-06	3.2E-06
Forklift	1.9E-02	1.6E-03	1.3E-02	3.6E-03	2.3E-03	2.2E-03
Total:	2.4	0.17	3.0	0.32	0.46	0.41

Table 3. GHG emissions by Activity (tons/year)

Activity	CO <sub>2</sub> e
LTOs, LFPs, APUs, and ground vehicles	1,053
CH-47 Run Up	28.3
UH-72 Run Up	15.1
UH-60 Run Up	7.3
Total:	1,103.7

Table 4. Aircraft Operational Data

Aircraft	LTO Count	LFP Count	Duration LFP (min)	Run Up Count	Duration of Run Up (min)
CH-47	122	1171	2.9	52	20
UH-60	122	1171	2.9	52	20
UH-72	122	659	2.9	52	20

Table 5. On-road Vehicle Operational Data

Vehicle Type	Classification	Total Vehicle Miles Traveled
HEMMT	HDDV	240
LMTV	LDDT	120
HMMWV	LDDT	480

Table 6. Off-road Vehicle Operational Data

Engine Type	Horsepower Rating	Load Factor	Hrs/Year
Forklift (Diesel)	55	30	104

Table 7. Aircraft Emission Factors

Aircraft/Mode <sup>1,2</sup>	Fuel Flowrate (lb/hr)	NO <sub>x</sub> (lb/1000lb fuel)	SO <sub>x</sub> (lb/1000lb fuel)	CO (lb/1000lb fuel)	VOC (lb/1000lb fuel)	PM <sub>10</sub> (lb/1000lb fuel)	PM <sub>2.5</sub> (lb/1000lb fuel)	CO <sub>2</sub> e (lb/1000lb fuel)
CH-47: Taxi/Idle-out	260	2.62	1.07	51.83	19.87	2.36	2.12	3,215
CH-47: Take Off	1,721	11.42	1.07	0.49	0.31	11.42	1.07	3,215
CH-47: Climb out (normal)	1,511	9.65	1.07	1.20	0.38	1.61	1.45	3,215
CH-47: Climb out (intermediate)	1,661	10.92	1.07	0.67	0.39	0.92	1.45	3,215
CH-47: Approach	1,287	8.54	1.07	1.94	0.40	1.61	1.77	3,215
CH-47: Taxi/Idle-in	260	2.62	1.07	51.83	19.87	2.36	2.12	3,215
UH-60: Taxi/Idle-out	134	3.36	1.07	46.24	0.50	1.48	1.33	3,215
UH-60: Take Off	725	11.43	1.07	2.81	0.01	2.61	2.33	3,215
UH-60: Climb out	626	11.87	1.07	3.51	0.01	2.22	2.00	3,215
UH-60: Approach	469	10.95	1.07	5.12	0.02	1.26	1.13	3,215
UH-60: Taxi/Idle-in	134	3.36	1.07	46.24	0.50	1.48	1.33	3,215
UH-72: Taxi/Idle-out	150	3.03	1.07	139.73	47.05	0.75	0.68	3,215
UH-72: Take Off	1,020	11.60	1.07	1.52	1.52	0.90	0.81	3,215
UH-72: Climb out (descend)	779	9.47	1.07	10.89	0.72	0.79	0.71	3,215
UH-72: Climb out (approach)	890	10.07	1.07	9.10	0.96	0.90	0.81	3,215
UH-72: Approach	656	7.88	1.07	14.56	0.44	0.79	0.71	3,215
UH-72: Taxi/Idle-in	150	3.03	1.07	139.73	47.05	0.75	0.68	3,215

1. Air Emissions Guide for Air Force Mobile Sources, AFCEC (2021), Table 2-8

2. Emission factors for engines T64-GE-413, T700-GE-700, PT6C-67C (6A-68) used for CH-47, UH-60 and UH-72 respectively.

Table 8. Aircraft Emission Factors

Engine <sup>1</sup>	NO <sub>x</sub>	SO <sub>x</sub>	CO	VOC	PM <sub>10</sub>	PM <sub>2.5</sub>
UH-60 APU	1.01	0.25	9.46	0.04	-	-

1. Air Emissions Guide for Air Force Mobile Sources, AFCEC (2021), Table 2-8

Table 9. Vehicle Emission Factors

Vehicle	NO <sub>x</sub>	SO <sub>x</sub>	CO	VOC	PM <sub>10</sub>	PM <sub>2.5</sub>
HDDV (g/mi) <sup>1</sup>	5.057	0.012	1.774	0.494	0.128	0.118
LDDT (g/mi) <sup>1</sup>	0.308	0.003	3.493	0.213	0.006	0.006
Forklift (lb/1000 hp-hr) <sup>2</sup>	22	1.9	15	4.21	2.7	2.62

1. *Air Emissions Guide for Air Force Mobile Sources*, AFCEC (2021), Table 5-21
2. *Air Emissions Guide for Air Force Mobile Sources*, AFCEC (2021), Table 3-6

Helicopters Aircraft Model(s)	Category	(# of Engines)	Setting	Rate (lb/hr)	NOx	SOx	CO	VOC	HAPs	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub> e	
CH-47	CH47 (CH-53D)	Military - Helicopter	T64-GE-413(2)	Idle	260	2.62	1.07	51.83	19.87	--	2.36	2.12	3214.59
				75% hp	1287	8.54	1.07	1.94	0.40	--	1.61	1.77	3214.59
				Normal Rated	1511	9.65	1.07	1.20	0.38	--	1.61	1.45	3214.59
				Intermediate	1661	10.92	1.07	0.67	0.39	--	0.92	1.45	3214.59
				Maximum	1721	11.42	1.07	0.49	0.31	--	0.92	1.45	3214.59
UH-60	UH60 (UH-60A)	Military - Helicopter	T700-GE-700(2)	Ground Idle	134	3.36	1.07	46.24	0.50	0.334	1.48	1.33	3214.59
				Flight Idle	469	10.95	1.07	5.12	0.02	0.007	1.26	1.13	3214.59
				Flight Max	626	11.87	1.07	3.51	0.01	0.003	2.22	2.00	3214.59
				Overspeed	725	11.43	1.07	2.81	0.01	0.007	2.61	2.33	3214.59
UH-72	UH72 (MH-139)	Military - Helicopter	PT6C-67C(2)	Ground Idle	150	3.03	1.07	139.73	47.05	--	0.75	0.68	3214.59
				Flight Idle	656	7.88	1.07	14.56	0.44	--	0.79	0.71	3214.59
				Descend	779	9.47	1.07	10.89	0.72	--	0.79	0.71	3214.59
				Approach	890	10.07	1.07	9.10	0.96	--	0.90	0.81	3214.59
				Max Continuous	1020	11.60	1.07	1.52	1.52	--	0.90	0.81	3214.59

Helicopters Aircraft Model(s)	Category	(# of Engines)	Assumption	Duration	Run-Up	NOx	SOx	CO	VOC	HAPs	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub> e	
CH-47	CH47 (CH-53D)	Military - Helicopter	T64-GE-413(2)	Taxi/Idle-out	8	5.59	0.00002	0.00001	0.00031	0.00012	--	0.00001	0.00001	0.01948
				Takeoff	2.27	1.59	0.00026	0.00002	0.00001	0.00001	--	0.00002	0.00003	0.07318
				Climb out	4.53	3.17	0.00086	0.00009	0.00008	0.00003	--	0.00010	0.00012	0.26918
				Approach	6.8	4.76	0.00044	0.00005	0.00010	0.00002	--	0.00008	0.00009	0.16394
				Taxi/Idle-In	7	4.90	0.00001	0.00001	0.00027	0.00011	--	0.00001	0.00001	0.01705
				per test			0.002	0.00018	0.00078	0.00029		0.00023	0.000269	0.542835
				52 annual tests			0.083	0.009	0.040	0.015		0.012	0.014	28.227
UH-60	UH60 (UH-60A)	Military - Helicopter	T700-GE-700(2)	Taxi/Idle-out	8	5.59	0.00001	0.000003	0.00014	0.0000016	--	0.000005	0.000004	0.01004
				Takeoff	2.27	1.59	0.00011	0.000010	0.00003	0.0000001	--	0.000025	0.00002	0.05974
				Climb out	4.53	3.17	0.00020	0.000018	0.00006	0.0000002	--	0.000037	0.00003	0.03083
				Approach	6.8	4.76	0.00020	0.000020	0.00010	0.0000004	--	0.000023	0.00002	0.03083
				Taxi/Idle-In	7	4.90	9.18E-06	0.000003	0.00014	0.0000014	--	0.000004	0.000004	0.00879
				per test			0.001	5.41E-05	4.69E-04	3.56E-06		9.38E-05	8.42E-05	1.40E-01
				52 annual tests			0.028	0.003	0.024	0.0002		0.005	0.004	7.292
UH-72	UH72 (MH-139)	Military - Helicopter	PT6C-67C(2)	Taxi/Idle-out	8	5.59	0.00001	0.00000	0.00049	0.00016	--	0.000003	0.00000	0.01124
				Takeoff	2.27	1.59	0.00016	0.00001	0.00002	0.00002	--	0.000012	0.00001	0.04337
				Climb out	4.53	3.17	0.00043	0.00005	0.00044	0.00004	--	0.000037	0.00003	0.14163
				Approach	6.8	4.76	0.00020	0.00003	0.00038	0.00001	--	0.000021	0.00002	0.08356
				Taxi/Idle-In	7	4.90	0.00008	0.000003	0.00043	0.00014	--	0.000002	0.000002	0.00983
				per test			0.00088	0.00010	0.00175	0.00038		0.00007	0.00007	0.28965
				52 annual tests			0.046	0.005	0.091	0.020		0.004	0.004	15.062
Total:						0.156	0.017	0.156	0.035	0.021	0.022	50.581		



# Record of Non-Applicability (RONA)

In Accordance with the Clean Air Act General Conformity Rule (40 CFR Part 51)

Development and Operation of a Limited Army Aviation Support Facility in Billings, Montana

## 1.0 Action Description

The Montana Army National Guard (MTARNG), in coordination with the National Guard Bureau (NGB), is proposing to construct permanent Limited Army Aviation Support Facility (LAASF) training buildings, hangar, and apron adjacent to the Billings Logan International Airport in Billings, Montana. Up to six helicopters (including but not limited to the CH-47 [Chinook], UH-60 [Blackhawk], and UH-72 [Lakota]) that are currently operating out of a leased hangar immediately to the east of the proposed location would be relocated to the new facilities. The LAASF would continue to operate military tactical vehicles. Operation of 4 Heavy Expanded Mobility Tactical Trucks (HEMMTs), 8 High Mobility Multipurpose Wheeled Vehicles (HMMWVs or Humvees), 2 Light Military Tactical Vehicles (LMTVs), and 1 forklift were included in the analysis.

The No Action Alternative is to continue to serve Eastern Montana training and emergency response activities from the leased LAASF hangar.

## 2.0 Analysis

General Conformity under the Clean Air Act, Section 176 was evaluated according to the requirements of 40 CFR 93, Subpart B. Total emissions were estimated on a calendar-year basis for steady state operations. Emissions were estimated using guidance found in the Air Force Civil Engineer Center (AFCEC) Air Emissions Guide for Air Force Mobile Sources (2020).

Based on the estimated emissions, the requirements of this rule are not applicable because they are below the General Conformity threshold values. Supporting documentation and emission estimates are attached.

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26 October 2023

Rebekah Myers  
Environmental Program Manager  
Montana Army National Guard

Date

## **Appendix F. Biological Resources Technical Memorandum**

# Biological Resources Technical Memorandum

**Prepared For:** Montana Army National Guard (MTARNG)

**Prepared By:** Jacobs Engineering Group Inc. (Jacobs)

**Date:** September 14, 2023

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## 1. Introduction

The Montana Army National Guard (MTARNG) and Department of Military Affairs (DMA), in coordination with the National Guard Bureau (NGB), is proposing to construct permanent Limited Army Aviation Support Facility (LAASF) training buildings, a hangar, and an apron adjacent to the Billings Logan International Airport in Billings, Montana (Figure 1). Up to six helicopters that are currently operating out of a leased hangar immediately to the east of the proposed location would be relocated to the new facilities.

This technical memorandum presents the existing conditions, impact assessment, and applicable mitigation measures related to Biological Resources.

### 1.1 Regulatory Context

Management responsibilities and regulatory authority applicable to general wildlife, habitats, and wildlife management for the LAASF are based on several regulatory policies designated at both the federal and state level (e.g., NEPA, ESA, Sikes Act, MCA Title 87). As part of the Department of Defense (DoD)'s policy for management of natural resources, the MTARNG prepares environmental reports including Integrated Natural Resource Management Plans for specific training locations and other National Environmental Policy Act (NEPA) documentation for statewide activities that guide the management of natural resources to support and be consistent with the military mission, while protecting and enhancing those resources.

#### 1.1.1 Endangered Species Act

The Endangered Species Act of 1973 (ESA) authorizes the U.S. Fish and Wildlife Service (USFWS) (while working cooperatively with States) to identify, list, and monitor qualifying species as endangered and threatened. The process by which potential candidates are listed is determined by the vulnerability of the species population while considering several different factors. Species that are designated as either endangered or threatened are afforded protection from possession, sale, transport, and take. The definition of take is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct" including "incidental take" or significant habitat modification. Take, however, can be permitted by USFWS through the ESA Section 7 consultation process among federal agencies or by individual permit under ESA Section 10(a)(1)(B) and an accompanying habitat conservation plan.

#### 1.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) integrates and implements four international treaties that provide for the protection of migratory birds. The MBTA prohibits the "taking, killing, possession, transportation, import, and export of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior." (16 United States Code [U.S.C.] § 703). The word "take" is defined by regulation as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt,



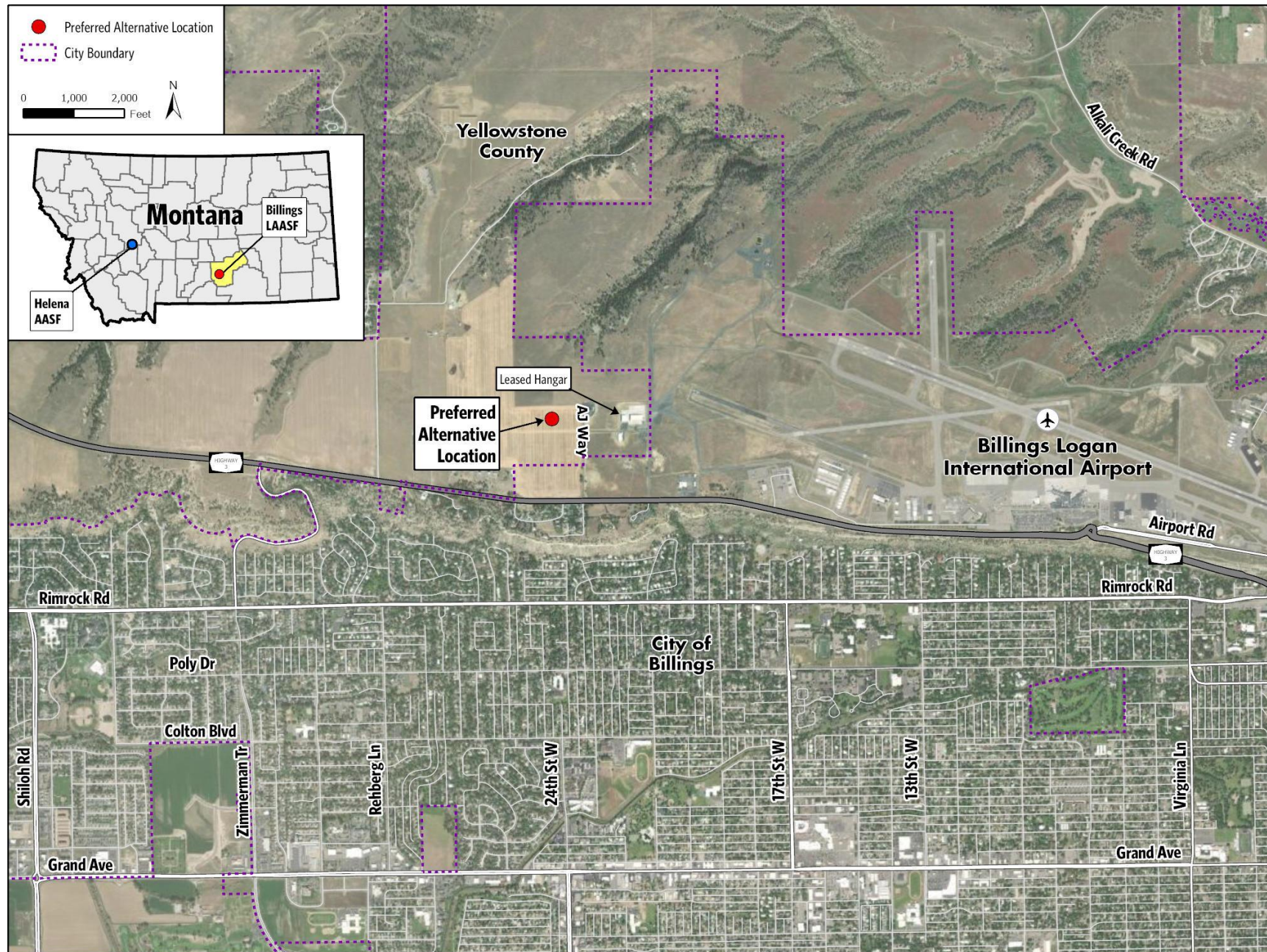


Figure 1. Project Location

shoot, wound, kill, trap, capture, or collect” (50 *Code of Federal Regulations* [CFR] § 10.12). USFWS maintains a list of all species protected by the MBTA at 50 CFR § 10.13. This list includes over one thousand species of migratory birds, including eagles and other raptors, waterfowl, shorebirds, seabirds, wading birds, and perching birds.

### **1.1.3 Bald and Golden Eagle Protection Act**

Under authority of the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668–668d), bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are afforded legal protections in addition to the MBTA. BGEPA prohibits the take, sale, purchase, barter, offer of sale, transport, export or import, at any time or in any manner of any bald or golden eagle, alive or dead, or any part, nest, or egg thereof. The BGEPA also expands the common law scope of “take” to include “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb,” (16 U.S.C. 668c), and includes criminal and civil penalties for violating the statute (16 U.S.C. 668). The USFWS further defined the term “disturb” as agitating or bothering an eagle to a degree that causes, or is likely to cause, injury, or either a decrease in productivity or nest abandonment by substantially interfering with normal breeding, feeding, or sheltering behavior. BGEPA specifies that violations must occur “knowingly, or with wanton disregard for this act.”

### **1.1.4 Birds of Conservation Concern**

The 1988 amendment to the Fish and Wildlife Conservation Act mandates the U.S. Fish and Wildlife Service identify species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act. Birds of Conservation Concern 2021 ([BCC] USFWS 2023a) is the most recent effort to carry out this mandate. The report identifies the migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent the Service's highest conservation priorities. BCC10, BCC11, and BCC17 designations represent inclusion on the BCC list for Bird Conservation Regions 10, 11, and 17 in Montana, respectively.

### **1.1.5 Environmental Analysis of Army Actions (Final Rule, 29 March 2002).**

NEPA and the Council on Environmental Quality (CEQ) regulations require Federal agencies to develop internal implementing procedures to ensure that environmental factors are considered in decision-making by using a systematic, interdisciplinary analytical approach. The Army has developed these agency-specific procedures, codified at 32 CFR Part 651, *Environmental Analysis of Army Actions* (Final Rule, 29 March 2002). Specifically, 32 CFR Part 651 —... “applies to actions of the Army and Army Reserve, to functions of the [Army National Guard] ARNG involving Federal funding, and to functions for which the Army is the DoD executive agent (32 CFR Part 651.1(e))”. 32 CFR Part 651 does the following:

- Sets forth policies, responsibilities, and procedures for integrating environmental considerations into Army and ARNG planning and decision-making.
- Describes the Army and ARNG process for preparing an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).
- Establishes criteria for determining Army and ARNG actions that may be categorically excluded from the requirements to prepare an EA or an EIS.

## **2. Project Description**

The Army National Guard prepares helicopter crews to fight and serve effectively on missions ranging from security and combat to disaster relief and rescue operations. Currently, operations are conducted



out of a hangar leased from Billings Flying Service adjacent to the Billings Logan International Airport. This Biological Resources Technical Memorandum addresses the impacts to biological resources due to the Montana Army National Guard (MTARNG) proposal to construct a permanent facility out of which it would conduct operations in Eastern Montana. The permanent facilities are needed to provide larger and better equipped training facilities, secure helicopter storage, and adequate security features and setbacks.

### **2.1.1 Proposed Action**

The Proposed Action is to construct a government owned permanent Limited Army Aviation Support Facility (LAASF) in Billings Montana, approximately 620 feet west of the current leased hangar. The proposed permanent facility includes approximately 66,000 square feet for the primary facility (plus parking and apron) compared to the 12,000 square foot leased hangar (plus parking and apron).

The proposed MTARNG-owned LAASF facility would accommodate a permanent hangar and would include backup/emergency generator, paved parking, unheated aircraft storage, and fire detection, alarm, and suppression equipment. It would meet industry standards and local, state, and federal building codes. Other features include utility connections, information systems, roads, sidewalks, curbs, gutters, storm drainage, and site improvements. The facility would be designed in accordance with UFC 1-200-02 and include energy efficiencies, be of sustainable design, and would be accessible to individuals with disabilities. Antiterrorism/Force Protection measures would be included that meet UFC 4-010-01. This large, long-term permanent facility includes space for training rooms, office space, and would accommodate the emerging growth needs and coverage requirements of the MTARNG aviation assets. The permanent facility would better accommodate on-the-ground drill and training activities.

The proposed LAASF (Figure 2) would provide facilities to support the current staffing of up to 14 full-time positions, conduct drill weekend activities, and perform light maintenance on the helicopters. The 14 fulltime personnel would live in their personal residences in Billings or the surrounding area and commute to the facility daily. On drill weekends, up to 90 personnel would travel to the facility from their residences. Given that Billings is the largest community in Montana and has a higher number of MTARNG personnel who live in Billings compared to other locations, it is estimated that 20-30 soldiers would stay in local hotels during drill weekends.

The proposed LAASF would support six helicopters of various types and sizes, including the Chinook, Blackhawk, and Lakota. Flights during drill weekends would occur primarily during the day, but at least one night flight per weekend would occur with the aircraft returning after dark, the timing of which would vary with the season. Training is anticipated to consist of 4 flights per week plus 6 flights per week for 9 drill weeks per year for each airframe. Flights follow flight paths that are approved by Air Traffic Control. Flight paths originate at the LAASF facility and travel over the airport north of Highway 3. Approximately 40 percent of the flights go to the east, 40 percent to the west, and 20 percent to the north.

Maintenance hover runs or flights are typically 50 to 60 minutes or less per aircraft, when required, and would be conducted at the airport. An estimated 150 maintenance runs occur per year. Typically, there are no more than two maintenance test flights per helicopter per week. Aviation fuel would be stored in two, USEPA-approved 10,000-gallon underground storage tank (UST), and refueling would be done on-site, most likely using a 2,500-gallon fuel truck. One above-ground storage tank will be used for diesel. Currently, four 2,500-gallon HEMMTs and one 5,000-gallon fuel truck are in use at the existing leased hangar.

Beginning in approximately 2026, annual training (AT) would occur at the LAASF about once every five years. Unlike other AT events where multiple units may train together, only the unit assigned to the

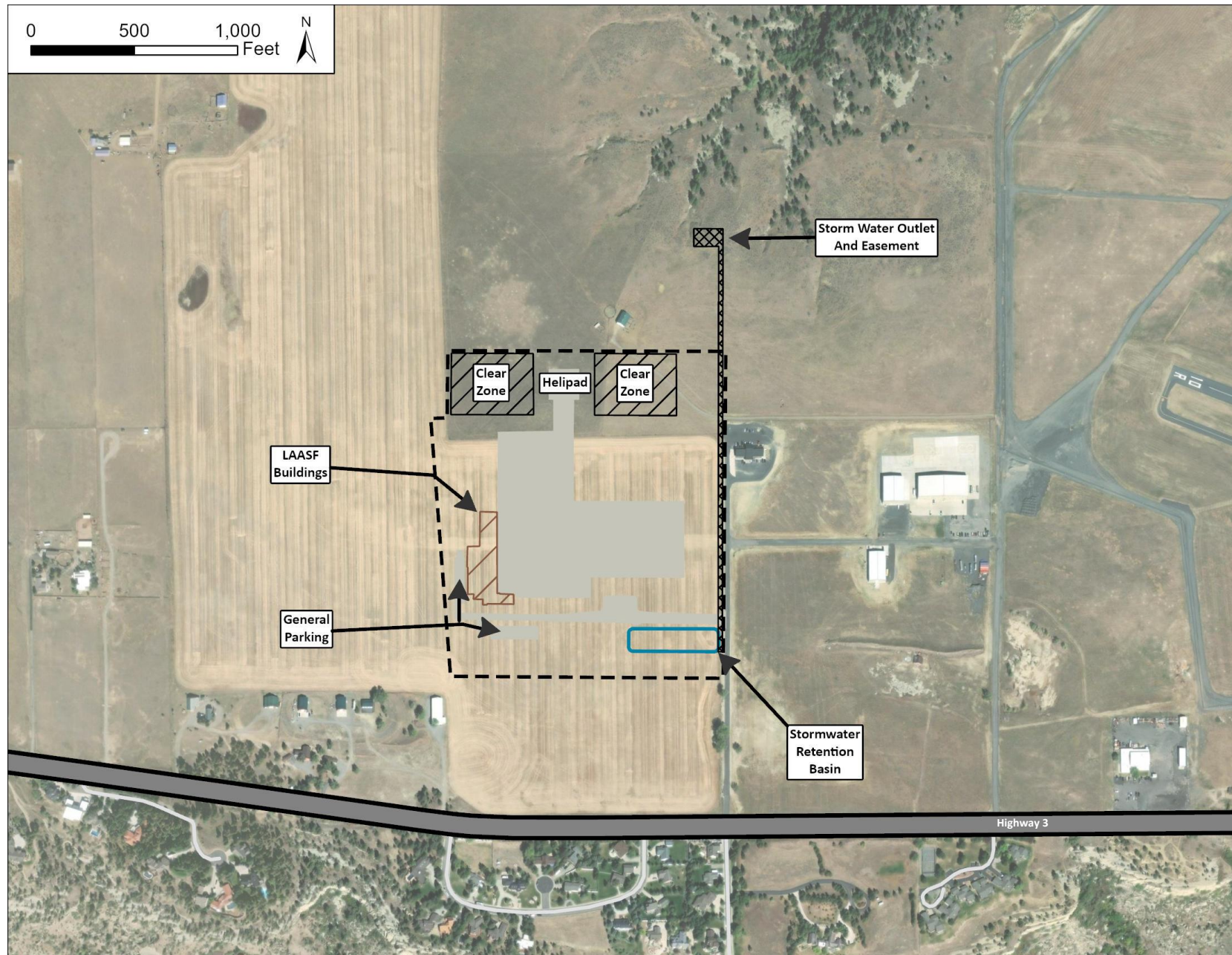


Figure 2. Project Area Map



LAASF would participate at these periodic events. Training activities (number of people, flights, etc.) would be the same as on a drill weekend but would extend over a 15-day period.

In addition to the activities that were previously analyzed for operations from the leased hangar, operating from a larger, permanent MTARNG facility would accommodate some additional activities that are allowed at an LAASF. These include:

- Wash helicopters
- Store hazardous wastes on site
- Improved classroom and administrative capabilities
- Avionics and engine maintenance
- Store petroleum, oil, and lubricants (POL)

### **2.1.1 Construction**

The facilities would include the construction of a permanent hangar and classroom/administration building, apron, parking areas, utilities, stormwater management, access road, security fencing and antiterrorism/force protection setbacks. The property would be accessed as the temporary hangar facility is from Highway 3 via AJ Way and approximately 1,000 feet of new access road. The hangar would include the following integral features: backup/emergency generator, paved organizational vehicle parking, unheated aircraft storage hangar, and fire suppression for maintenance hangars and aircraft storage hangar. Runoff would be directed to an on-site stormwater retention basin. Construction would also include all utility services (includes connection to city water and sewer), information systems, fire detection and alarm systems, roads, sidewalks, curbs, gutters, storm drainage, personal vehicle parking areas, and site improvements.

Construction would include the operation of heavy equipment, regular vehicles, and increased human activity in the project area. Construction is anticipated to take 24 months, with the LAASF beginning operations in mid-2026.

## **3. Methodology**

The methodology for the biological resource review included a desktop review and a field survey. The desktop review included evaluation of aerial, soil, and topographic maps to determine if potentially threatened and endangered species habitat, jurisdictional wetlands, and waters of the United States occur within the survey area.

A field evaluation was conducted June 1, 2023, by Jacobs' biologist Jill Harris to assess the presence of biological resources, including special-status species, wetlands, and other water resources. The field survey was confined to the limits of the Billings LAASF project (project area) and included the approximately 40 acres for constructing the training facilities, hangar, helicopter pad, clear zones, parking lots, and utilities, including water and wastewater infrastructure to support the facilities.

## **4. Environmental Setting**

The proposed LAASF is in the Great Plains Physiographic Province, a vast high plateau of semiarid grassland characterized by low hills and incised stream valleys (Britannica 2023). The area is subject to variable climatic conditions characterized by cold winters and warm summers, with low precipitation and humidity, and is often windy (Britannica 2023). The soils in the project area are predominantly sandy loam and well drained (NRCS 2023). Elevation of the project site is approximately 3,727 feet above mean sea level.

The project area is made up of approximately 40 acres located approximately one mile west of Billings Logan International Airport. The project area is a relatively flat, open area and is made up of several privately owned parcels in Section 26, in Township 1 North, Range 25 East. The project area includes an agricultural field and pastureland with topography gently sloping down towards the southeast. Overland surface water flows north, towards an unnamed tributary of Alkali Creek approximately 0.25 mile north of the project area. Alkali Creek is located approximately 2 miles to the northeast, and the Yellowstone River is located approximately five miles east of the proposed facility. Surrounding land use consists mostly of commercial airfield, agricultural lands, residential and commercial development, and undeveloped open areas (refer Figure 2). The Highway 3 transportation corridor occurs south of the project (refer to Figure 1).

## 4.1 Vegetation Communities

The LAASF would occur on agricultural fields, pastureland, and open space lands on airport property that are mowed and maintained regularly. The project is located within habitat classified as a combination of agriculture (cultivated crops)/developed/open space containing vegetation (primarily grasses) with less than 20 percent impervious surfaces; sagebrush steppe dominated by perennial grasses and forbs with greater than 25 percent cover; and Great Plains mixed-grass prairie (Montana Natural Heritage Program [MTNHP] 2023a). The project area contains grasses that comprise the greatest canopy cover, with the dominant species being western wheatgrass (*Pascopyrum smithii*). Other species in the project area include thickspike wheatgrass (*Elymus lanceolatus*), blue grama (*Bouteloua gracilis*), Indian bluegrass (*Bothriochloa pertusa*), and needle and thread (*Hesperostipa comata*). In this area common plant associations include Wyoming big sagebrush-western wheatgrass (*Artemisia tridentata* ssp. *wyomingensis*/*Pascopyrum smithii*). Other common species observed include prickly pear (*Opuntia* spp.), fringed sagebrush (*Artemisia frigida*), evening primrose (*Oenothera* spp.) broom snakeweed (*Gutierrezia sarothrae*), great plains yucca (*Yucca clauca*), scarlet globemallow (*Sphaeralcea coccinea*), wild buckwheat (*Fallopia convovulus*), tall tumble mustard (*Sisymbrium altissimum*), and common yarrow (*Achillea millefolium*).

Eastern ponderosa pine (*Pinus ponderosa*) forest occurs in adjacent areas to the north on hills and drainages. Three domestic horses were present on the pasturelands where the potential helipad, clear zones, and part of the water utilities would occur.

No wetlands as mapped by the USFWS National Wetlands Inventory (USFWS 2023b) occur in the project area.

## 4.2 Wildlife

Avian species were observed during the June 1, 2023, field survey including western meadowlark (*Sturnella neglecta*), horned lark (*Eremophila alpestris*), vesper sparrow (*Pooecetes gramineus*), common raven (*Corvus corax*), eastern kingbird (*Tyrannus tyrannus*), and red-breasted nuthatch (*Sitta canadensis*) in the nearby pine trees. Burrows typical of black-tailed prairie dogs (*Cynomys ludovicianus*) were recorded in the northwest portion of the survey area, within the proposed west clear zone and the helipad locations. No prairie dogs or fresh sign were found, suggesting that these burrows are probably no longer in use.

In addition, numerous other species of wildlife may occur within the project area and the adjacent landscape including white-tailed deer (*Odocoileus virginianus*), mule deer (*Odocoileus hemionus*), coyote (*Canus lutrans*), Richardson's ground squirrel (*Spermophilus richardsonii*), plains garter snake (*Thamnophis radix*), prairie rattlesnake (*Crotalus viridis*), bats (e.g., *Myotis* spp., *Antrozous pallidus*), great-horned owl (*Bubo virginianus*), and common sagebrush lizard (*Sceloporus graciosus*) (MTNHP 2023b). The area surrounding the project site has been previously disturbed and the patchwork

distribution of grasslands does not maintain the physical and biological dynamics of landscape characteristics within this prairie expanse.

Man-made obstacles such as buildings, airports, highways, and fences that are found in association with or adjacent to the project area are partial or complete barriers to movement of some wildlife species. Major highways in the vicinity include Highway 3. Additionally, airport land use and associated fencing of the airfield has also limited wildlife access to the area, reducing any wildlife movement corridors.

## 4.3 Special Status Species

### Federally Listed Species

Montana Fish, Wildlife and Parks Department (FWP) maintains management authority for the state's wildlife. The Montana Natural Heritage Program (MTNHP) database is a program of the Montana State Library and operated by the University of Montana. The USFWS Information for Planning and Consultation (IPaC) System, and the MTNHP were reviewed to determine if any federally listed species potentially occur in the vicinity of the proposed LAASF. The one species included on the USFWS IPaC is addressed in Table 1 along with the corresponding ESA status; a brief description of habitat; and the potential for occurrence of the species or its habitat at the LAASF.

**Table 1. Federally Listed Species and their Potential to Occur within the Proposed Project Vicinity**

Species Name	Status*	Habitat	Potential to Occur
Monarch butterfly ( <i>Danaus plexippus</i> )	ESA-C	Variety of habitats, including fields, roadside areas, native prairie, wet areas, or gardens with milkweed and flowering plants. Rely on nectar of blooming plants during the monarch migration timeframe (February to March; September to November). Rarely above treeline in alpine terrain during migration.	There is suitable native habitat in the project limits.

Source: USFWS, September 14, 2023, <http://ecos.fws.gov/ipac>;

\*C = ESA Candidate.

Suitable habitat is present within the Project area for one federally listed species, the monarch butterfly. Monarch butterflies migrate to Montana in the spring from overwintering sites in California and Mexico. They follow the blooming of nectar plants to the north and from low to higher elevations and back between spring and fall. The monarch butterfly is designated as a candidate species under the ESA. ESA candidate species are those species for which sufficient information on biological status and threats exists to propose to list them as threatened or endangered; however, none of the substantive or procedural provisions of the ESA apply to candidate species. The project may impact individuals of Monarch butterflies but is not likely to result in a trend toward federal listing or loss of viability.

There is no critical habitat within the project area.

Implementation of the project is not anticipated to adversely affect any protected ESA-listed species.

### Special Status Plant Species

There are no plant species of concern or special status in the project area as indicated by MTNHP databases (MTNHP 2023c); therefore, no impact on special status plant species is anticipated due to the project.

## Montana State Species of Concern

Species of Concern are native taxa that are at-risk due to declining population trends, threats to their habitats, restricted distribution, and/or other factors. Designation as a Montana Species of Concern or Potential Species of Concern is based on the Montana Status Rank and is not a statutory or regulatory classification. Rather, these designations provide information that helps resource managers make proactive decisions regarding species conservation and data collection priorities. Species included on the MTNHP databases are addressed in Table 2 along with their corresponding status, a brief description of habitat, and the potential for occurrence of the species or its habitat at the LAASF.

**Table 2. Montana State Species of Concern and their Potential to Occur within the Project Vicinity**

Species Name	Status*	Habitat	Potential to Occur
Black-tailed Prairie Dog ( <i>Cynomys ludovicianus</i> )	S3	Flat, open grasslands and shrub/grasslands with low stature, relatively sparse vegetation. The most frequently occupied habitat in Montana is dominated by western wheatgrass, blue grama, and big sagebrush.	May be present in the project area. Burrows detected but did not appear to be active.
Little Brown Myotis ( <i>Myotis lucifugus</i> )	S3	Found in a variety of habitats across a large elevation gradient. Commonly forages over water. Summer day roosts include attics, barns, bridges, snags, loose bark, and bat houses. Known maternity roosts in Montana are primarily buildings.	May be present in the project area.
Golden Eagle ( <i>Aquila chrysaetos</i> )	BGEPA; MBTA; S3	Nest on cliffs and in large trees (occasionally on power poles), and hunt over prairie (grasslands) and open woodlands. Observation reported along Highway 3, Yellowstone County, in 2011.	No suitable nesting habitat; high level of human activity at adjacent airport reduces potential of suitable foraging habitat.
Burrowing Owl ( <i>Athene cunicularia</i> )	MBTA; BCC17	Open grasslands, uses abandoned burrows dug by mammals such as ground squirrels ( <i>Spermophilus</i> spp.), prairie dogs ( <i>Cynomys</i> spp.) and badgers ( <i>Taxidea taxus</i> ). Black-tailed prairie dog ( <i>Cynomys ludovicianus</i> ) and Richardson's ground squirrel colonies provide the primary and secondary habitat in the area.	May be present in project area.
Ferruginous Hawk ( <i>Buteo regalis</i> )	MBTA; BCC17	Summer breeding occurs in mixed-grass prairie with black greasewood ( <i>Sarcobatus vermiculatus</i> ) and big sagebrush ( <i>Artemisia tridentata</i> ) in uplands and drainages. Also found in shrub-grasslands, grasslands, grass-sagebrush complex, and sagebrush steppe. Do not appear to nest in areas converted to agriculture. Observation reported along Highway 3, Billings in 2011.	May be present in project area.
Chestnut-collared Longspur ( <i>Calcarius ornatus</i> )	MBTA; BCC11; BCC17; S2	Grasslands with short-to-medium grasses that have been recently grazed or mowed. Prefers native pastures.	May be present in project area.

Species Name	Status*	Habitat	Potential to Occur
Baird's Sparrow ( <i>Centronyx bairdii</i> )	MBTA; BCC11; BCC17	Grasslands. Prefer to nest in native prairie with a relatively complex structure.	May be present in project area.
Bobolink ( <i>Dolichonyx oryzivorus</i> )	MBTA; BCC10; BCC11; BCC17	Moist Grasslands. Nests built in tall grass and mixed-grass prairies. Prefers "old" hay fields with high grass-to-legume ratios.	May be present in project area.
Long-billed Curlew ( <i>Numenius americanus</i> )	MBTA; BCC11	Grasslands. Breeds in mixed-grass prairie habitats and moist meadows throughout Montana. It prefers to nest in open, short-statured grasslands and avoids areas with trees, dense shrubs, or tall, dense grasses. Observation reported along Highway 3, Billings in 2011.	May be present in project area.
Greater short-horned Lizard ( <i>Phrynosoma hernandesi</i> )	S3; SGIN	Sandy / gravelly soils, ridge crests between coulees, and in sparse, short grass and sagebrush with sun-baked soil.	No suitable habitat present.

Source: MTNHP 2023c and d. Montana Natural Heritage Program May 22, 2023, updated June 6, 2023, <https://FieldGuide.mt.gov>;

BCC =Birds of Conservation Concern; regions 10, 11, 17 occur in Montana

MBTA- Migratory Bird Treaty Act

Montana State Species Ranking: S2: At risk because of very limited and/or potentially declining population numbers, range and/or habitat, making it vulnerable to global extinction or extirpation in the state; S3: Potentially at risk because of limited and/or declining numbers, range and/or habitat, even though it may be abundant in some areas; SGIN = species of greatest inventory need; species in need of survey data

Prairie dog burrows were found within the project area; however, there was no sign of current or recent activity associated with the burrows.

The Project area contains suitable foraging habitat for golden eagles; however, the high concentration of human activity, reduces the potential suitability of the site. The project will not disturb or result in take of bald or golden eagles.

## 4.4 Habitat Suitability Evaluation and Species Assessment

The project site consists of previously disturbed grasslands now in active agricultural and pastureland production and a small area of intact but previously disturbed sagebrush in the northern section of the project area. Construction of the new facilities would disturb soil and vegetation, with approximately 40 acres of habitat loss or alteration.

Although there would be no impacts on ESA-listed protected species, there are other protected resources within the action area, including migratory birds and native plants, that could be potentially impacted by implementation of the project.

Numerous avian species were observed foraging within the LAASF project area. Potential nesting habitat for birds protected under the Migratory Bird Treaty Act is present within the project area and on adjacent lands within 0.5 mile. Preconstruction nest surveys should be conducted prior to any vegetation clearing or ground disturbing activities during nesting season (April 1 through August 31). Migratory birds protected under the Migratory Bird Treaty Act, DoD Partners in Flight mission-sensitive priority bird species, and other special status avian species would be managed as recommended by FWP and the Billings Logan International Airport regulations. With these measures in place there would be a negligible adverse impact on migratory birds.

The main source of disturbance to wildlife with the operation of the LAASF would be from helicopter activities and noise (e.g., aircraft overflights). Ongoing aviation activities affect wildlife, and those effects would continue, although with a minor increase in quantity if the project is authorized. Addition of helicopters, vehicles, and personnel would increase the noise levels in and adjacent to the project site. However, the project is located adjacent to an existing airport; there is existing aircraft noise and the expectation that it will continue. Wildlife inhabiting the project area would be expected to have habituated to the continuous noise generated by aircraft using the airport and the presence of people.

Existing operations would be relocated to the west and would result in disturbance associated with human activities required for military training and result in a long-term direct impact on wildlife for the duration of military operations. Vehicle use for personnel accessing the training facility would continue to potentially result in incidental injury to wildlife. Mortality to birds (bird strike) could be slightly greater than current operations due to there being sufficient space for six helicopters where current facilities can only accommodate four. Measures for reducing conflicts of aircraft with wildlife, in particular bird strike, are a component of the Federally mandated Wildlife Hazard Management Plan for the adjacent Billings Logan International Airport. With the proximity of the airport, the proposed LAASF would also benefit from these existing measures. The fencing along the perimeter of the airport and proposed security fencing around the LAASF site would restrict wildlife movement in this area.

Invasive plant species occur within the project area. Invasive plant species could further be introduced via construction equipment and due to soil disturbance. Measures should be implemented to reduce the potential introduction of invasive species.

No aquatic resources were identified within the project area, and no Clean Water Act Section 404 permit is anticipated for the LAASF location.

## **5. Environmental Considerations**

- If an occupied bird nest is identified during nesting season (1 April - 31 Aug) when ground disturbing activities would occur, construction would avoid the nest until coordination with the Natural Resources Department has been completed and a determination on how to proceed is made.
- Prior to the start of ground-disturbing activities and throughout the duration of construction and any landscape establishment period, the control of noxious and invasive species in the project area should be arranged for and performed.
- To prevent the introduction or spread of invasive species seeds, all earthmoving and hauling equipment should be washed prior to entering the construction site and all construction equipment should be inspected and attached debris removed, including plant parts, soil and mud prior to the equipment entering the construction site.

## 6. References

- Britannica. 2023. *Great Plains region, North America*. Primary Authors: Elwyn B. Robinson and John L. Dietz. <https://www.britannica.com/place/Great-Plains>. Encyclopedia Britannica, Inc. Accessed May 2023.
- Montana Natural Heritage Program (MTNHP). 2023a. Natural Heritage Map Viewer. Land Cover. Available at: <https://mtnhp.org/mapviewer/>. Accessed May 22, 2023.
- \_\_\_\_\_. 2023b. Natural Heritage Map Viewer. Generalized Observations for Species. Available at: <https://mtnhp.org/mapviewer/>. Accessed May 22, 2023.
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- Natural Resources Conservation Service (NRCS). 2023. Custom Soil Resource Report for Yellowstone County, Montana. Accessed June 5, 2023.
- U.S. Fish and Wildlife Service. 2023a. Birds of Conservation Concern 2021. United States Department of the Interior, U.S. Fish and Wildlife Service, Migratory Birds, Falls Church, Virginia. <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>.
- \_\_\_\_\_. 2023b. National Wetlands Inventory, Wetlands Mapper. Available at: <https://www.fws.gov/wetlands/data/mapper.html>. Accessed June 5, 2023.
- \_\_\_\_\_. 2023c. Information for Planning and Consultation System (IPAC) Species List. Available at: <http://www.ecos.fws.gov/ipac.pdf>. Accessed May 11, 2023, updated September 11, 2023.





## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Montana Ecological Services Field Office  
585 Shephard Way, Suite 1  
Helena, MT 59601-6287  
Phone: (406) 449-5225 Fax: (406) 449-5339



In Reply Refer To:

September 14, 2023

Project Code: 2023-0129291

Project Name: MTARNG Limited Army Aviation Support Facility\_Billings

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

## OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Montana Ecological Services Field Office**

585 Shephard Way, Suite 1

Helena, MT 59601-6287

(406) 449-5225

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## PROJECT SUMMARY

Project Code: 2023-0129291

Project Name: MTARNG Limited Army Aviation Support Facility\_Billings

Project Type: Military Operations

Project Description: Montana Army National Guard (MTARNG) is proposing to construct permanent Limited Army Aviation Support Facility (LAASF) training buildings, a hangar, and an apron adjacent to the Billings Logan International Airport in Billings, Montana. Up to six helicopters that are currently operating out of a leased hangar immediately to the east of the proposed location would be relocated to the new facilities. The proposed permanent facility includes approximately 66,000 square feet for the primary facility (plus parking and apron) and would accommodate a permanent hangar and include backup/emergency generator, paved parking, unheated aircraft storage, and fire detection, alarm, and suppression equipment.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@45.809021900000005,-108.57748383377354,14z>



Counties: Yellowstone County, Montana

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

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## BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act<sup>1</sup> and the Migratory Bird Treaty Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats<sup>3</sup>, should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

- 
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
  2. The [Migratory Birds Treaty Act](#) of 1918.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

### There are bald and/or golden eagles in your project area.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Dec 1 to Aug 31
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1680">https://ecos.fws.gov/ecp/species/1680</a>	Breeds Dec 1 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

### Breeding Season (■)

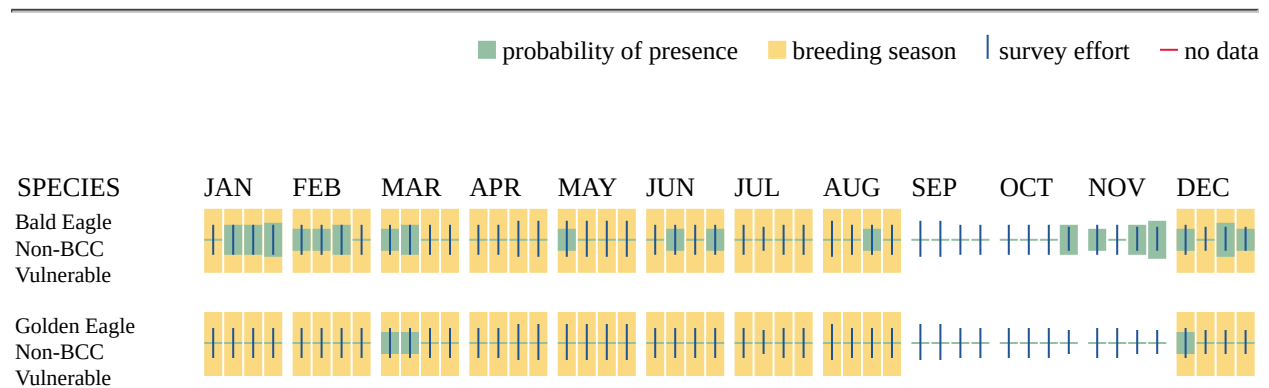
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

### Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats<sup>3</sup> should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

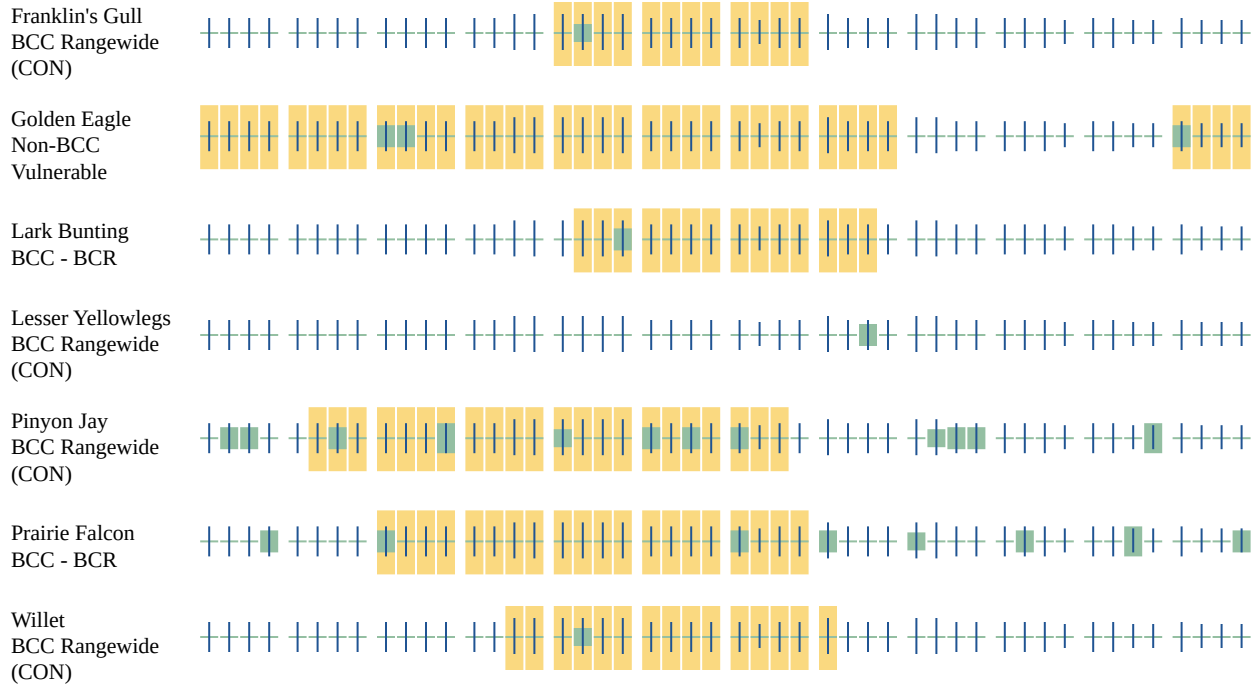
- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)
-

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Dec 1 to Aug 31
<b>California Gull <i>Larus californicus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 1 to Jul 31
<b>Chestnut-collared Longspur <i>Calcarius ornatus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 10
<b>Ferruginous Hawk <i>Buteo regalis</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/6038">https://ecos.fws.gov/ecp/species/6038</a>	Breeds Mar 15 to Aug 15
<b>Franklin's Gull <i>Leucophaeus pipixcan</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
<b>Golden Eagle <i>Aquila chrysaetos</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1680">https://ecos.fws.gov/ecp/species/1680</a>	Breeds Dec 1 to Aug 31
<b>Lark Bunting <i>Calamospiza melanocorys</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 10 to Aug 15
<b>Lesser Yellowlegs <i>Tringa flavipes</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9679">https://ecos.fws.gov/ecp/species/9679</a>	Breeds elsewhere
<b>Pinyon Jay <i>Gymnorhinus cyanocephalus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9420">https://ecos.fws.gov/ecp/species/9420</a>	Breeds Feb 15 to Jul 15
<b>Prairie Falcon <i>Falco mexicanus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/4736">https://ecos.fws.gov/ecp/species/4736</a>	Breeds Mar 1 to Jul 31







Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

## **IPAC USER CONTACT INFORMATION**

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## **Appendix G. USEPA EJScreen Report**

Save as PDF



## EJScreen Report (Version 2.11)

1 mile Ring around the Area

MONTANA, EPA Region 8

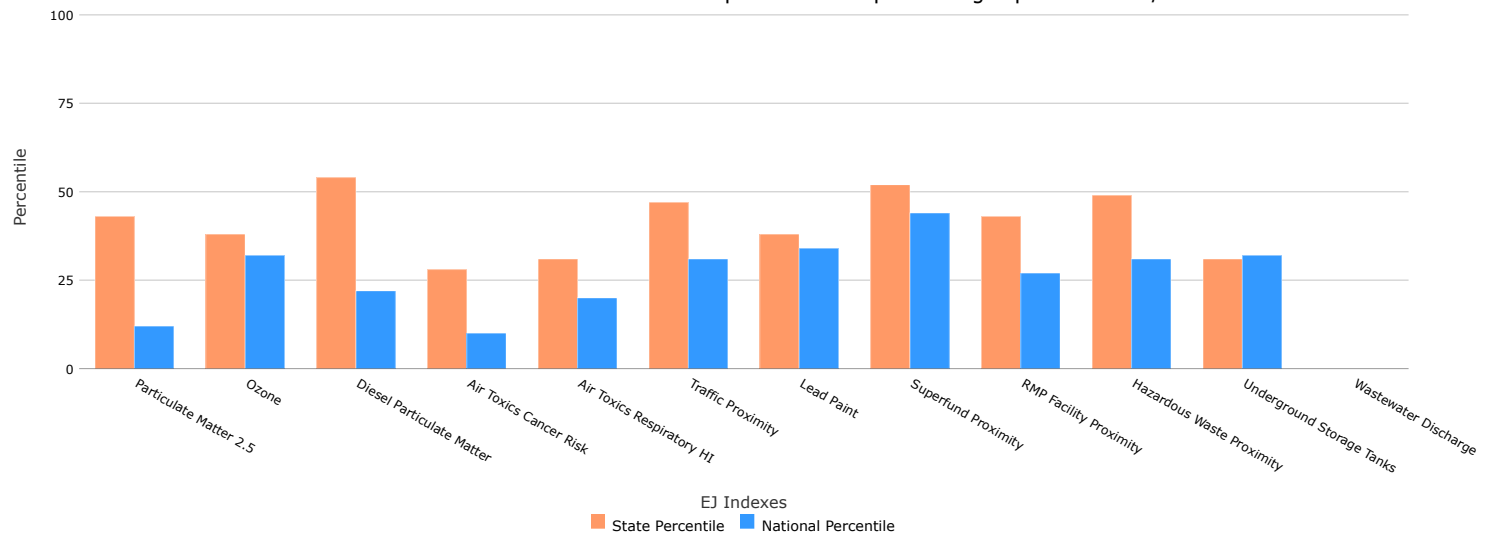
Approximate Population: 4,009

Input Area (sq. miles): 3.92

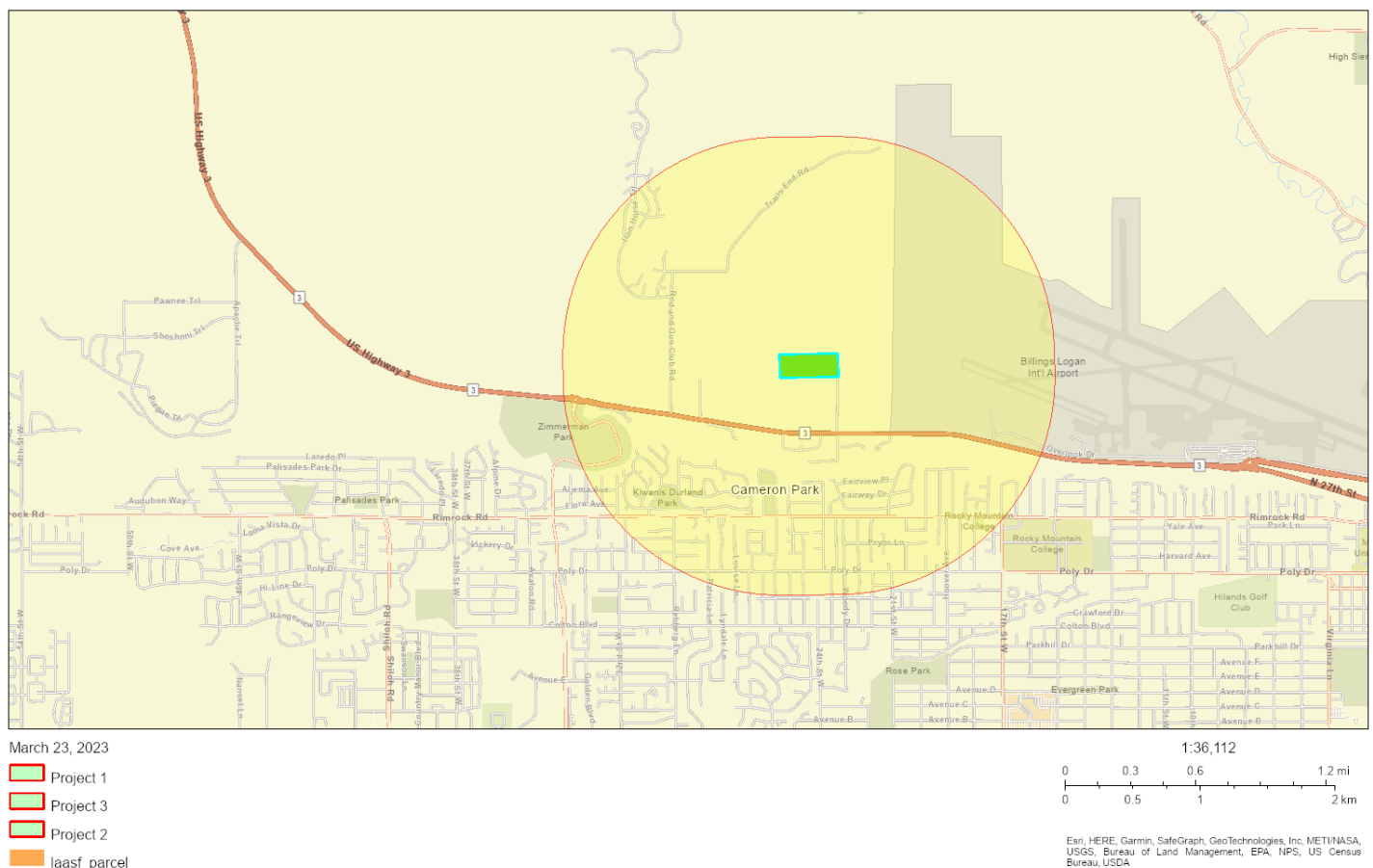
Selected Variables	Percentile in State	Percentile in USA
<b>Environmental Justice Indexes</b>		
Particulate Matter 2.5 EJ Index	43	12
Ozone EJ Index	38	32
Diesel Particulate Matter EJ Index*	54	22
Air Toxics Cancer Risk EJ Index*	28	10
Air Toxics Respiratory HI EJ Index*	31	20
Traffic Proximity EJ Index	47	31
Lead Paint EJ Index	38	34
Superfund Proximity EJ Index	52	44
RMP Facility Proximity EJ Index	43	27
Hazardous Waste Proximity EJ Index	49	31
Underground Storage Tanks EJ Index	31	32
Wastewater Discharge EJ Index	0	0

EJ Indexes - The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/US



\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>. (<https://www.epa.gov/haps/air-toxics-data-update>)



#### Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

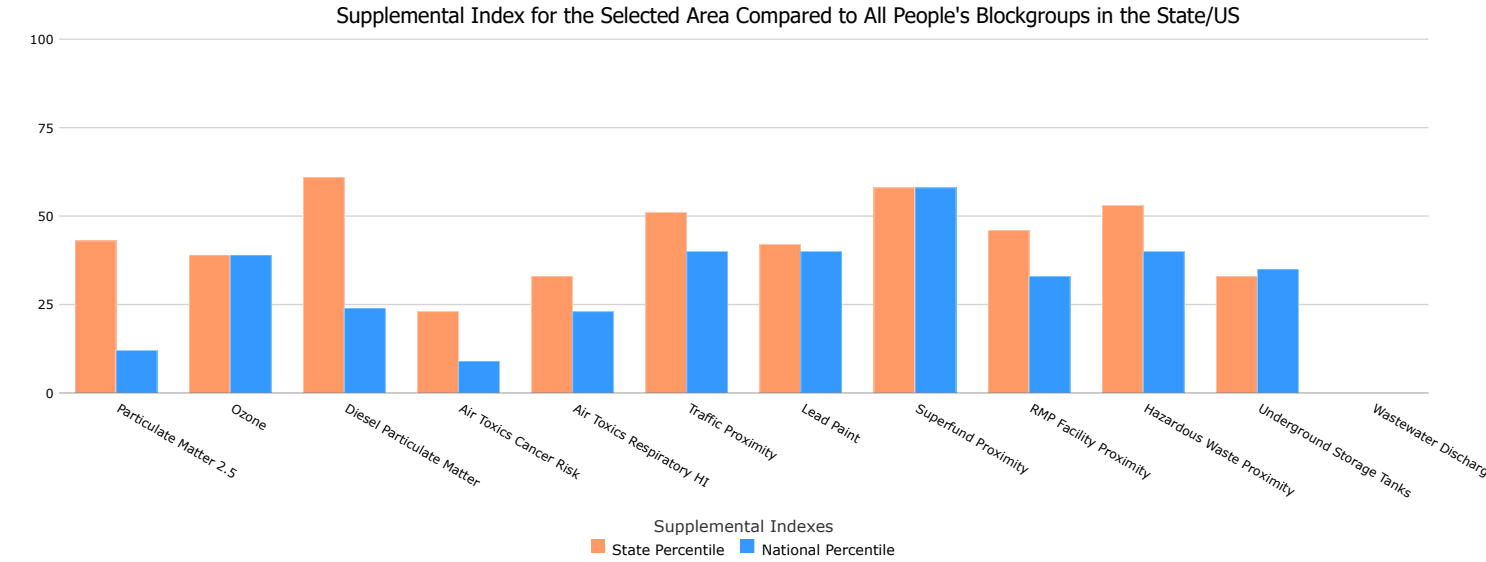
Selected Variables	Value	State		USA	
		Avg.	%tile	Avg.	%tile
Pollution and Sources					
Particulate Matter 2.5 (µg/m³)	7.2	6.84	66	8.67	16
Ozone (ppb)	42.8	42.2	60	42.5	56
Diesel Particulate Matter* (µg/m³)	0.167	0.0761	90	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	20	21	79	28	<50th
Air Toxics Respiratory HI*	0.3	0.32	74	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	350	220	76	760	58
Lead Paint (% Pre-1960 Housing)	0.34	0.27	61	0.27	61
Superfund Proximity (site count/km distance)	0.2	0.15	76	0.13	85
RMP Facility Proximity (facility count/km distance)	0.24	0.49	62	0.77	43
Hazardous Waste Proximity (facility count/km distance)	0.92	0.74	72	2.2	54
Underground Storage Tanks (count/km²)	2.9	5.1	65	3.9	66
Wastewater Discharge (toxicity-weighted concentration/m distance)	0	2.2	0	12	0
Socioeconomic Indicators					
Demographic Index	11%	24%	17	35%	13
Supplemental Demographic Index	7%	13%	12	15%	19
People of Color	10%	14%	52	40%	23
Low Income	13%	32%	12	30%	23
Unemployment Rate	2%	4%	47	5%	35
Limited English Speaking	0%	0%	0	5%	0
Less Than High School Education	4%	6%	44	12%	31
Under Age 5	3%	6%	30	6%	31
Over Age 64	22%	19%	60	16%	73
Low Life Expectancy	17%	19%	29	20%	28

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using

reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

Selected Variables	Percentile in State	Percentile in USA
<b>Supplemental Indexes</b>		
Particulate Matter 2.5 Supplemental Index	43	12
Ozone Supplemental Index	39	39
Diesel Particulate Matter Supplemental Index*	61	24
Air Toxics Cancer Risk Supplemental Index*	23	9
Air Toxics Respiratory HI Supplemental Index*	33	23
Traffic Proximity Supplemental Index	51	40
Lead Paint Supplemental Index	42	40
Superfund Proximity Supplemental Index	58	58
RMP Facility Proximity Supplemental Index	46	33
Hazardous Waste Proximity Supplemental Index	53	40
Underground Storage Tanks Supplemental Index	33	35
Wastewater Discharge Supplemental Index	0	0

Supplemental Indexes - The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on low-income, limited English speaking, less than high school education, unemployed, and low life expectancy populations with a single environmental indicator.



This report shows the values for environmental and demographic indicators, EJScreen indexes, and supplemental indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)