



MDT-ENV-020 06/21

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Montana Department of Transportation  
Environmental Services Bureau  
Categorical Exclusion (CE) Documentation

PO Box 201001  
2701 Prospect Avenue  
Helena, MT 59620  
(406) 444-7203

Control Number NA

Date 2021-10-04

## Part 1 - Project Summary

Project Name Northwest Billings Connector and Marathon Trail Project (Federal BUILD Grant project)

Project Number NA

Control Number NA

## Part 2 - Environmental Classification

2.a. Status of Categorical Exclusion (CE): ☐ Draft ☒ Final ☐ Re-Evaluation Date Oct 4, 2021

2.b. Applicable laws and funding mechanisms:

☒ NEPA - FHWA (23 CFR 771.117)☐ NEPA - Other (Other Federal Agency and CFR Citation)☐ MEPA - MDT (ARM 18.2.261)☐ MEPA - Other (Other State Agency and ARM Citation)

(If additional NEPA and/or MEPA rules are triggered, cite applicable rules and discuss additional requirements in Part 7 below.)

2.c. Classification of FHWA NEPA CE: ☐ N/A ☐ Listed CE(c) ☐ Listed CE(d) ☒ Not listed CE

Explain

23 CFR 771.117(d) - Unlisted: Additional actions that meet the criteria for a CE in the CEQ regulations (40 CFR 1508.1) and paragraph (a) of 23 CFR 771.117 may be designated as CEs only after Administration approval. The grant recipient will provide sufficient documentation for the NEPA record to demonstrate that significant environmental effects will not result from the proposed action.

2.d. Is FHWA concurrence on the CE being requested. ☒ Yes ☐ No

## Part 3 - Project Information

3.a. Project Description (i.e., reconstruct, rural/urban, bridge replacement, rehab, new through lane). Include milestone document reference.

## NOTE TO READER:

The proposed Northwest Billings Connector and Marathon Trail Project is being funded with a 2020 grant under the U.S. Department of Transportation "Better Utilizing Investments to Leverage Development", or BUILD, Transportation Discretionary Grant Program. Use of federal funds provided by the BUILD Grant makes this project subject to the requirements of the National Environmental Policy Act (NEPA). The Montana Department of Transportation (MDT) will review the proposed project as it relates to project effects to the state routes (Montana Highway 3 (MT-3)) through its Systems Impact Action Process (SIAP). MDT is not designing this project, nor will they be approving the project NEPA document. That said, the Grant recipient has chosen to largely follow the MDT process for documenting NEPA compliance through use of this MDT-ENV-020 Categorical Exclusion (CE) Documentation Form.

The following MDT CE Form and supporting resource reports are presented by the City of Billings, in cooperation with the Yellowstone County, to substantiate its conclusion that the proposed Northwest Billings Connector and Marathon Trail Project qualifies for a CE. The Federal Highway Administration (FHWA) will use this information to evaluate the proposed project under NEPA. As it relates to Part 9 of this form, FHWA Signature Rationale, FHWA concurrence is not required on this project, but rather FHWA is the lead federal agency and signatory for this federal action. This CE details direct effects resulting from the proposed project; indirect and cumulative effects are documented in a separate report entitled, "Indirect and Cumulative Effects Analysis" and as summarized in Section 6.11.

See Part 8, FHWA Comments, in this form for additional details for certain resource categories, especially for sections of this form that require additional information where no space is provided.

## PROJECT DESCRIPTION:

In 2020, the City of Billings was awarded \$11.6 million in funding from the Federal Better Utilizing Investments to Leverage Development, or BUILD, Transportation Discretionary Grant program to fund transportation improvements in the northwest



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Billings area. The overall scope of the Northwest Billings Connector and Marathon Trail Project includes design and construction of five miles of new collector roadway and eight miles of multi-use trail. The proposed project includes two main project elements as described in the 2020 grant application and include:

1. The Inner Belt Loop: This is a five-mile stretch of two-lane rural section roadway connecting MT-3/Zimmerman Trail Road to Alkali Creek Road/Skyway Drive accompanied by a separated multi-use trail. It will create a new connection between the Heights and West End. This proposed road has also been referred to as the Northwest Billings Connector. The proposed Inner Belt Loop road consists of approximately five miles of two-lane roadway with two 12-foot lanes and six-foot shoulders. The paved surface width is 28 feet and the roadway section is 36 feet wide. A separated 10-foot-wide multi-use path is proposed along the entire length of the Inner Belt Loop. The proposed roadway will begin at the existing roundabout at MT-3 and Zimmerman Trail and connect to the Alkali Creek Road at its intersection with the recently constructed Skyway Drive. The right-of-way width for the new road and trail is generally 90 feet wide and new right-of-way will be required for the project.

2. The Skyline Trail: This is a 10-foot-wide multi-use path that will begin at the existing multi-use trail at the MT-3/Zimmerman Trail roundabout and extend approximately three miles eastward on the south side of MT-3 to connect with an existing trail system located near the entrance to the Billings Logan International Airport. The proposed Skyline Trail will be within existing MDT right-of-way and intersect City of Billings-owned property. Parking lots proposed along the trail will require an easement from MDT to extend into MT-3 right-of-way.

☒ Yes ☐ No Horizontal alignment shift?

Describe

The proposed Inner Belt Loop will be a new two-lane facility built on a new horizontal alignment. The proposed Skyline Trail will be built on a new horizontal alignment.

☒ Yes ☐ No Vertical alignment shift?

Describe

The proposed Inner Belt Loop will be built on a new vertical alignment. The proposed Skyline Trail will be built on a new vertical alignment.

☒ Yes ☐ No Does the project result in capacity expansion of a roadway by addition of one or more through lanes?

Describe

The proposed Inner Belt Loop will be a new 2-lane collector roadway connecting MT-3/Zimmerman Trail Road to Alkali Creek Road/Skyway Drive. The proposed project does not add capacity to any existing roadways.

***If the project results in capacity expansion of a roadway by addition of one or more through lanes, FHWA signature is required.***

3.b. Project Location Description (include beginning and ending RPs; Section, Township, Range, County, town/nearest town.

The proposed project is located on the northern edge of Billings, Montana, and is partially located within the City of Billings limits. The project area is located to the north of MT-3 and to the west of Alkali Creek Road and is located within portions of Section 18 of Township 1 North, Range 26 East and Sections 13, 14, 15, 22, and 27 of Township 1 North, Range 25 East.

The Billings MS4 boundary encompasses the greater urban area of Billings, which includes areas both within City of Billings limits and Yellowstone County. The project is located partially within the MS4 boundary. Specifically, the proposed Inner Belt Loop alignment is located within the MS4 boundary where it passes through city limits in the vicinity of the Rehberg Ranch development and Iron Horse Trail road, and the proposed Skyline Trail paralleling MT-3 is located entirely within the City MS4 boundary.

The proposed project includes components that intersect with the Billings Carbon Monoxide (CO) and Sulfur Dioxide (SO<sub>2</sub>) Air Quality Maintenance Areas. It is important to note that the proposed Skyline Trail, a non-motorized trail, intersects the CO and SO<sub>2</sub> Maintenance Areas, whereas the proposed Inner Belt Loop roadway corridor does not.

3.c. Have the local officials (city and/or county) been consulted on the project? Explain below.

Yes. The proposed project has included a robust planning effort dating back over a decade and has included substantial local official participation. The City of Billings is administering the federal BUILD grant and overseeing project development and construction. Once complete, the proposed project would be operated and maintained by the City of Billings.



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3.d. Are relevant local planning documents available?

☒ Yes ☐ No ☐ N/A

If yes, see below, select one of the following:

☒ A copy of the plan is on file. The proposed project is consistent with the plan.

☐ A copy of the plan is on file. The proposed project is not consistent with the plan. Additional documentation is attached.

3.e. Right-of-Way

☒ Yes ☐ No Will acquisition of right-of-way be required?

☒ Yes ☐ No Will construction permits or temporary easements be required?

## Part 4 - Municipal Separate Storm Sewer System (MS4) Issues (See Storm Water Management Plan and Environmental Manual Chapter 46)

☒ Yes ☐ No ☐ TBD Is the project within a regulated MS4 Area?

Yes (Area)  A Low Impact Development (LID) Practice analysis will be conducted and documented in the file. Coordination with local MS4 coordinator will occur and be documented.

## Part 5 - Permits and Approvals (Environmental Manual Chapter 29)

Yes	No	TBD	Permit or Approval	Describe
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	US Army Corps of Engineers <input checked="" type="checkbox"/> CWA Sec 404	<input type="checkbox"/> Section 10
		<input type="checkbox"/>	Exempt Activity	
		<input type="checkbox"/>	Non-Notification Nationwide	
		<input checked="" type="checkbox"/>	Notification Nationwide Type	The project is anticipated to meet the criteria for CWA authorization using either NWP 14 or NWP 23. A pre-construction notification will be submitted to the USACE using the standard Montana Joint Application form.
		<input type="checkbox"/>	Individual Permit <i>(If individual permit is required, the PA threshold is exceeded, FHWA must concur with PE finding for federally funded project)</i>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CW 401 Certification Authority <input checked="" type="checkbox"/> DEQ	<input type="checkbox"/> EPA <input type="checkbox"/> Tribal Govt
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual 401 Certification	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Tribal Permit for Aquatic Resources <input type="checkbox"/> ALCO	<input type="checkbox"/> ALPO
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Stream Protection Act - SPA 124	

Notes (Provide additional explanation as needed.)

Unavoidable wetland impacts are estimated to total 0.09-acre. The unavoidable wetland impact is occurring to the edge of a wetland located on the north side of the Inner Belt Loop alignment near its terminus with Alkali Creek Road. This wetland is located near Alkali Creek and is assumed to be jurisdictional. The City of Billings will apply for Section 404 authorization using the Joint Application permit during the final design process. Compensatory mitigation will be accomplished by purchasing mitigation credits available from the Upper Yellowstone Mitigation Bank. A Stream Protection Act authorization (SPA 124) is not necessary.

The proposed project will be designed in accordance with the MS4 General Permit requirements including the evaluation for the applicability of the requirement to incorporate Low Impact Development (LID) practices. According to the current MS4 permit, those LID practices will need to infiltrate, evapo-transpire, or capture for reuse, the runoff generated from the first 0.5 inches of rainfall from a 24-hour storm preceded by 48 hours of no measurable precipitation, when practicable. The MDT LID Practice Analysis Form will be completed at a later phase in the project and added to the project file to summarize LID practices included in the project design, or to describe LID practices that were determined to be not practicable. More information can be found in Part 6.22 of this form.





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## Part 6 - Social, Economic and Environment Considerations

The following sections describe resources that may be present and the potential impacts (direct, indirect, permanent and temporary) that may result from the proposed project. If a resource may be adversely impacted by the project, cumulative impacts, including growth impacts, will need to be identified and discussed. Describe potential mitigation measures that will be employed. Attach additional pages or supplemental information if necessary.

### 6.1. Access

#### 6.1.a. Permanent Access Control Changes

☐ Yes ☒ No Will this action result in the creation or modification of an access control resolution for a particular roadway.

#### 6.1.b. Temporary Access or Changes in Access Control

☒ Yes ☐ No Will the following conditions be met: The proposed project will not involve major traffic disruptions because the following provisions will be made for access by local traffic and be posted. Through-traffic dependent businesses would not be adversely affected. Interference to local events such as festivals or parades would be avoided or minimized. The temporary road, detour or ramp closure will not substantially change the environmental consequences of the action. There will not be substantial controversy associated with the use of temporary road, detour, or ramp closure.

### 6.2 Air Quality (Environmental Manual Chapter 42)

#### 6.2.a. Criteria Pollutants

☒ Yes ☐ No Is the project subject to conformity?

☐ Yes ☒ No Is the project exempt from conformity?

The project is located in a Nonattainment/Maintenance Area.

Nonattainment/Maintenance Area

☒ Yes ☐ No ☐ N/A Is the project included in a conforming plan?

This project is included in the STIP, TIP, or LRIP adopted on the following date:

No additional analysis is necessary.

Date

#### 6.2.b. Is this project exempt from Mobile Source Air Toxins (MSAT'S) analysis?

☐ Yes. Rationale is documented in the ISA.

☒ No. The project has low potential for MSAT effects. Rationale is documented in the ISA.

☐ No. The project has high potential for MSAT effects. MDT will conduct and document an MSAT analysis.

In accordance with MDT Standard Specification 107.11.3, the contractor would be required to adhere to applicable air quality rules and regulations, which may required the use of dust suppression and emission control measures to minimize short-term construction-related impacts.

### 6.3 Aquatic Resources

☐ Due to the nature and scope of the project, no impacts to aquatic resources are expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

#### 6.3.a. Wetlands

☒ Yes ☐ No ☐ TBD Are wetlands present on or adjacent to the project site?

All practicable means to avoid and minimize impacts will be employed. All unavoidable impacts will be mitigated in accordance with applicable requirements (e.g., US Army Corps, Tribal, and/or EO 11990).

Available Wetland Mitigation Site(s) or mitigation strategy, as needed: (Discussion)

Two wetlands were delineated adjacent to the proposed project. Wetlands are located at the toe of slope of a previously constructed road embankment adjacent to Alkali Creek Road that will be improved by the proposed project and complete avoidance of the wetland is not possible. Unavoidable wetland impacts will occur and are estimated to total 0.09-acre of wetland. The City of Billings will apply for Section 404 authorization using the Joint Application permit during the final design process. The project will comply with with Executive Order 11990 and compensatory mitigation will be accomplished during final design by purchasing mitigation credits available from the Upper Yellowstone Mitigation Bank.



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**6.3.b. Streams**

☐ Yes ☒ No ☐ TBD Are stream(s) present on or adjacent to the project site.

Available Stream Site(s) or mitigation strategy, as needed: (Discussion)

No streams will be affected by the proposed project. No stream mitigation is necessary.

**6.3.c Other Regulated Aquatic Resources** (Irrigation features, lakes, etc.)

☐ Yes ☒ No ☐ TBD Are other aquatic resources present on or adjacent to the project site.

Available Other Aquatic Resource Site(s) or mitigation strategy, as needed: (Discussion)

No other aquatic resources were identified within the project limits.

Additional Discussion (Explanation)

An Aquatic Resources Report for the project was completed on September 9, 2021, which provides a detailed description of the methods and results of aquatic resources delineation within the project area. This report is available on the project website.

The contractor will be required to adhere to the terms and conditions of MDT Standard Specification Section 208 for Water Pollution Control and Aquatic Resource Preservation.

**6.4 Biological Resources**

**6.4.a. Threatened and Endangered Species Act**

☐ Due to the nature and scope of the project, no impacts to protected resources would be expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

☐ Yes ☒ No Are there any recorded occurrences of T&E Species and/or critical habitat in the proposed project's vicinity?

No additional analysis necessary.

**6.4.b. Bald and Golden Eagle Protection**

☐ Due to the nature and scope of the project, no impacts to protected resources would be expected. Adequate and supporting information is included in Part 3. No detailed analysis is necessary.

☐ Yes ☒ No Are there recorded Bald and/or Golden Eagle nests in the proposed project's vicinity?

No additional analysis necessary.

**6.4.c. Migratory Bird Treaty Act**

☐ Due to the nature and scope of the project, no impacts to protected resources would be expected. Adequate and supporting information is included in Part 3. No detailed analysis is necessary.

☐ Yes ☒ No The proposed project may have impacts subject to the conditions of the Migratory Bird Treaty Act (MBTA).

No additional analysis necessary.

**Additional Discussion on Biological Resources**

The proposed project's potential effects on threatened or endangered federally listed species were evaluated in the Biological Assessment (BA), which was completed on September 1, 2021, and available on the project website. The BA concluded the project will have "no effect" on the federally listed whooping crane and red knot. The following information is summarized from the BA to support the "no effect" determination:

• Whooping Crane: No impact on whooping crane is anticipated as a result of the proposed project. Although some cropland will be directly converted to transportation uses, whooping crane use of the project area is expected to be extremely rare to non-existent. No impact on suitable riparian areas potentially used by migrating whooping cranes would occur as a result of the proposed project. In the very unlikely event whooping crane passed through the project area during construction, potential impacts on this species would be temporary and indirect, predominantly attributed to construction-related noise. Because there is no breeding habitat in the state, the species has never been recorded in the immediate project area, and is not anticipated to occur there, the proposed project is not anticipated to affect whooping crane. Based on information presented above, a "no effect" determination is rendered relative to the whooping crane.

• Red Knot: Red knot use of the project area is expected to be extremely rare to non-existent. Suitable habitat does not exist in the project action area. For these reasons, the proposed project is anticipated to have no impact on the red knot. Based on information presented above, a "no effect" determination is rendered relative to the red knot.



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The proposed project would be implemented in compliance with the MBTA through inclusion of MDT standard MBTA environmental specifications. The environmental specification Migratory Bird Treaty Act Compliance – Vegetation Removal (found in Subsection 208.02.4(A)(1) of the MDT Standard Specifications Manual) will be included in the final construction bid documents to avoid and minimize potential impacts on migratory birds resulting from vegetation removal. This specification requires that any cutting of trees or shrubs be completed during the non-nesting periods (August 16 through April 15 of any given year).

The proposed project intersects Greater Sage-Grouse general habitat and consultation with the Montana Sage Grouse Habitat Conservation Program (MSGHCP) is currently in-progress. The City of Billings has begun consultation with the MSGHCP by submitting a project application through the MSGHCP Consultation and Review website. Preliminary correspondence with the MSGHCP indicate that compensatory mitigation will be required to offset impacts to Greater Sage-Grouse general habitat resulting from the project. Additional coordination with the MSGHCP will occur during final design and, if required, compensatory mitigation will be paid to the MSGHCP and consultation will be completed in a timely manner and prior to seeking any state or federal permits for the project.

#### 6.5 Economic Impacts (Environmental Manual Chapter 20)

- ☐ Due to the nature and scope of the project, no effects on the local economy are expected. No detailed analysis necessary.
- ☒ Due to the nature and scope of the project, minor or temporary effects on the local economy are expected. A detailed analysis is necessary. The following explanation will justify that the impact is not "significant". (Explain below)
- ☐ A detailed economic analysis has been conducted and is documented in the file and/or summarized in Section 7. Analysis does not indicate potential for significant adverse impact.

Potential economic impacts are determined to be not significant because no adverse economic effects have been identified. The proposed project would construct a major arterial roadway that provides the necessary connection to respond to and facilitate organized growth that is projected to occur in the project area and alleviate traffic congestion in constrained portions near downtown.

Explain not "significant"

The proposed project is likely to have minor and short-term beneficial impact on the local economy and income. Construction of the project may result in direct and indirect temporary employment opportunities for local residents and short-term increased spending benefiting the local economy. Indirect and cumulative effects are documented in the report entitled, "Indirect and Cumulative Effects Analysis".

#### 6.6 Environmental Justice (EJ) (Environmental Manual Chapter 24).

Would the proposed project likely create disproportionately high and/or adverse impact on the health or environment of minority and/or low-income populations as described in Executive Order 12898?

- ☐ Due to the nature and scope of the project, no disproportionately high and/or adverse EJ impact is expected. No detailed analysis necessary.
- ☒ Due to the nature and scope of the project, minor effects on EJ populations may occur. A detailed analysis is not necessary. The following explanation will justify that the impact is not "disproportionately high and/or adverse". (Explain below.)
- ☐ An EJ analysis has been conducted and is documented in the file and/or summarized in Section 7. Analysis does not indicate potential for significant adverse impact.

No significant impacts on EJ populations have been identified as a result of the proposed project. American Community Survey (ACS) data for 2019 (5-yr estimates) from the U.S. Census Bureau on race and poverty was reviewed for the project area, which includes Census Tract 14.02. EJ populations within Census Tract 14.02 was compared to similar statistics for Yellowstone County and the State of Montana to identify if the project area contains EJ populations. According to the ACS (Table ID B02001), Census Tract 14.02 contains a total of 6,118 people, of which, 297, or 4.9 percent, are minority population. Minority population percentages within Yellowstone County and Montana are 9.8 percent and 11.5 percent, respectively. As such, the project area (Census Tract 14.02) includes a substantially lower percentage of minority population as compared to the county and state level.

Explain Not "Adverse"

Poverty status was also reviewed for the same geographies. According to the ACS (Table ID S1701),





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the project area (Census Tract 14.02) has a total of 184 people, or 3.0 percent, living below the poverty level. Yellowstone County has a total of 15,199 people, or 9.8 percent, and Montana a total of 134,605, or 13.1 percent, living below the poverty level. As such, the project area (Census Tract 14.02) includes a substantially lower percentage of low-income population as compared to the county and state level.

Based on this analysis, the project area does not include EJ populations. No impact on any minority or low-income population is anticipated and no displacement or relocation of any businesses or residents will occur. Because of these reasons, the proposed project would not result in disproportionately high or adverse human health and environmental effects on low-income or minority populations.

**6.7 Farmland Protection Policy Act (FPPA) (Environmental Manual Chapter 33)**

☐ Due to the nature and scope of the project, no impacts to farmland resources are expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

☐ Yes ☒ No Is the project within existing ROW acquired on or before 8/4/84 or located within an area of existing development?

☐ Yes ☒ No Is the project specifically for the purposes of national defense?

6.7.a. Will farmland (as defined in 7 CFR 658.2) be directly or indirectly converted as a result of the project?

☐ No. Project is not subject to FPPA. No additional analysis or discussion required.

☒ Yes. A farmland impact analysis was conducted in accordance with the most current NRCS procedures and is documented in the file. Analysis does not indicate potential for significant adverse impact.

☐ Yes. A farmland impact analysis will be conducted in accordance with the most current NRCS procedures and will be documented in the file. Analysis will not indicate potential for significant adverse impact or else the level of environmental documentation will be re-evaluated.

**6.8 Floodplains**

All stream crossing would be designed in accordance with Executive Order (EO) 111988 amended and 23 CFR 650 Subpart A and in coordination with the appropriate regulatory agencies. Projects within a designated 100-year floodplain will have a floodplain development permit prior to the start of construction. MDT Hydraulics will secure and document the permit for the permanent facility. In accordance with Standard Specification 107.11.2.H, the contractor is required to secure applicable floodplain permits for temporary facilities.

☒ Due to the nature and scope of the project, no impacts to floodplains are expected. Adequate supporting information is included in Part 3.a above. No detailed analysis is necessary.

Additional Information if needed

**6.9. Hazardous Materials and Substances (Environmental Manual Chapter 44.)**

☐ Due to the nature and scope of the project, no impacts to hazardous materials and substances are expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

☐ Yes ☒ No The project occurs in an area where local permitting is required for ground disturbance activities in a Superfund Site.

☐ Yes ☒ No Hazardous materials, hazardous substances, and/or petroleum products are currently on and/or adjacent to the proposed project.

No additional analysis necessary.

Additional information if needed

Should evidence of hazardous materials and/or underground storage tanks be discovered during construction, in accordance with MDT Standard Specifications 107.23 and 107.24, the contractor would be required to immediately stop work in the area until the significance of the site is determined and appropriate measures implemented.

**6.10. Historic and Archaeological Resources (Environmental Manual Chapter 30.)**



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☐ Due to the nature and scope of the project, no impacts to historic and archaeological resources are expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

☒ Yes ☐ No Are any historic, archaeological or cultural resources on or eligible for listing on the National Register present within the project's Area of Potential Effect?

## Historic Resources

Smithsonian #	Name	Eligible?	Date of Concurrence in Eligibility	Effect Determination	Date of Effect Determination
24YL1850	historic material scatter	No	NA	NA	NA
24YL1851	historic livestock ranching location	No	NA	NA	NA

Add Row

Delete Last Row

☐ Yes ☒ No Is there confirmed potential for adverse effect on cultural/historic resources?

Provide additional information below, if needed or reference Section 7. Include specific information related to each resource by Smithsonian Number. Cut and paste from existing reports.

An addendum to the 2010 Inner Belt Loop cultural resources survey was completed in June 2021 that updated the report by resurveying portions of the area of potential effect (APE), updating site forms for Sites 24YL1850 and 24YL1851, and surveying the proposed Skyline Trail. The 2021 report has recommended Sites 24YL1850 and 24YL1851 and not eligible for the National Register of Historic Places (NRHP). In a letter dated August 10, 2021, FHWA requested concurrence from SHPO on the ineligibility of Sites 24YL1850 and 24YL1851. The SHPO concurred with the ineligibility determination in a letter dated August 12, 2021. Because Sites 24YL1850 and 24YL1851 are ineligible for the NRHP, no adverse effect on cultural or historic resources would occur as a result of the project.

Should evidence of historic or pre-historic sites be discovered during construction, in accordance with MDT Standard Specifications 107.11, the contractor would be required to immediately stop work in the area until the significance of the site is determined and appropriate measures implemented.

## 6.11. Induced Growth Analysis - Impacts to Planned Growth and Land Use [\(Induced Growth Guidance\)](#)

☐ Yes ☒ No Is this project exempt from screening due to the nature and scope of the project?

☒ Yes ☐ No Does the project have an economic development purpose?

Detailed analysis will be conducted and documented in the file.

☒ Yes ☐ No Is the land developable in the areas served by the project?

☒ Yes ☐ No Does the project region exhibit evidence of growth pressure?

Detailed analysis will be conducted and documented in the file.

Additional information, if needed.

The proposed project was assessed for its potential for project-influenced growth (e.g., increased population and/or traffic, changes in land use, etc.). The detailed analysis is found within the Northwest Billings Connector and Marathon Trail Project Indirect and Cumulative Effects Analysis, which is available on the project website. Potential indirect land use effects resulting from the proposed project were evaluated consistent with the MDT publication "Assessing the Extent and Determinants of Induced Growth" (Tidd et. al. 2013). Significant impacts were not identified.

The proposed project would construct a major arterial roadway that provides the necessary connection to respond to and facilitate organized growth that is projected to occur in the project area (regardless of whether the federal BUILD project gets constructed) and alleviate traffic congestion in constrained portions near downtown. The project area has been identified in numerous plans for future growth and city annexation is anticipated to occur in accordance with the City growth policy, adopted land use plan, and long-term annexation goals. The proposed project is anticipated to increase economic opportunities by improving access to destinations northwest of downtown, which will guide development closer to the city center rather than the western fringe of the city. This will allow future city growth to be more geographically compact, while at the same time result in a





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multitude of environmental benefits (e.g., preserving prime farmland to the west of the city, reducing congestion and emissions, etc.).

The goals and vision of the Inner Belt Loop corridor are well defined in the 2020 Inner Belt Loop Corridor Planning Study and project implementation as well as future development in accordance with the 2020 plan is anticipated to mitigate effects resulting from the proposed project.

**6.12 Noise** (Environmental Manual Chapter 43)

☒ Yes ☐ No Is this a Type I action as defined in 23 CFR 772?

***If yes, PA threshold exceeded, FHWA must concur with the CE finding for a federally funded project.***

Compliance with provisions of 23 CFT 772 and MDT's Noise Policy will be ensured and documented in the file. Noise abatement will be examined for reasonableness and feasibility. A final decision of the installation of the abatement measure(s) will be made upon completion of the project's final design and the public involvement process. At any point in the design process, if new or different information is identified that could impact the significance assessment associated with the noise impact, an amended NEPA/MEPA analysis could be required. If significant impacts were identified, an Environmental Impact Statement (EIS) process may need to be initiated or the project design may need to be modified. (Explain below)

In accordance with Section 5.4.1 of the Montana Department of Transportation (MDT) Noise Analysis & Abatement Policy, a noise study boundary was developed encompassing 500 feet on each side of the proposed roadway (1,000 feet wide total). It was determined through a review of aerial photography and current cadastral records, and confirmed by the design engineer, that there are no noise receptors present within the noise study boundary. Therefore, noise impacts are not predicted as part of the proposed project.

**6.13. Public Involvement**

☐ Yes ☒ No A public involvement plan would be completed in accordance with MDT's Public Involvement Handbook.

Because the proposed project is not an MDT project, the MDT Public Involvement Handbook is not applicable. However, the City of Billings is implementing a public involvement process for the proposed project. A project-specific website has been created for the proposed BUILD project (see <https://ci.billings.mt.us/2964/BUILD-Grant-2021>). The project website includes regular project updates, links to environmental technical reports and other project background documents, and City staff contact information to allow the public to submit questions or comments. The final Categorical Exclusion document will be posted on the website for public review and awareness.

Explain

The MPO Policy Coordinating Committee meeting held on June 15, 2021, provided a kick-off meeting for the proposed BUILD project and was open to public participation. No public comments are provided in the meeting minutes. The City has sent out several BUILD grant update messages through their civic electronic mailing list and social media outlets. In addition, the City will hold a public meeting/open house at a location and time to be determined. The public meeting/open house will provide an opportunity for the City to present the BUILD project to the public, provide an update on the design process and tentative construction schedule, and, importantly, describe the environmental review process that has been completed and allow for written public comments and question and answer period. Should new information or new impacts be identified as a result of the future public meeting, this CE will be re-evaluated accordingly.

The proposed project is a culmination of several planning studies that have been completed over the past 10+ years as well substantial public involvement for these planning projects that is directly applicable to the proposed project. The 2020 Inner Belt Loop Corridor Planning Study has included a robust public involvement effort: public meetings, steering committee meetings, neighborhood meetings, an interactive project website, social media updates, and other media/email updates. The proposed Skyline Trail component of the project is the culmination of two separate planning efforts: The Highway 3 Corridor Study and the Billings Bikeway + Trails Master Plan, both of which included focused public outreach and meetings, steering committee meetings, among other activities.



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#### 6.14 Recreational Resources

☐ Due to the nature and scope of the project, no impacts to publicly-owned recreation resources are expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

☒ Yes ☐ No Publicly-owned recreational resources are present on or adjacent to the project site.

Recreational Resources			
Resource Name	Agency with Jurisdiction	Impact?	Description of Impact
Swords Park	City of Billings	No	NA
Zimmerman Park	Yellowstone County	No	NA
Add Row	Delete Last Row		

☐ Work has been coordinated with the managing agency/agencies. Documentation is available upon request.

☒ Work will be coordinated and documented with the managing agency/agencies.

Additional information, if needed:

Swords Park and Zimmerman Park are adjacent to the proposed project at either end of the proposed Skyline Trail, but there will be no adverse impact to either of these sites. See Part 6.16 below for more information.

If there is a "use" of Section 4(f) property, document it in Section 6.16 below.  
If there is a "conversion" of Section 6(f) property, document it in Section 6.17 below.

#### 6.15 Right-of-Way (ROW)

☒ Yes ☐ No Will acquisition of ROW be required?

☒ Yes ☐ No Will construction permits or temporary easement be required?

☒ Yes ☐ No ☐ N/A Will ROW acquisition be considered "minor" per the Programmatic Agreement (PA)? *For purposes of the PA, an acquisition is considered more than minor if it will substantially affect the functionality of the property and/or primary structure on the property.* If no, action may not be processed under paragraphs CE(c)(26), (c)(27), and (c)(28).

☐ Yes ☒ No ☐ N/A Will residential or commercial displacement be required? If yes, action may not be processed under paragraphs CE(c)(26), (c)(27), and (c)(28).

☐ Yes ☒ No ☐ N/A Will acquisition of land for hardship or protective purposes, or early acquisition be required?

#### 6.16 Section 4(f) of the US Department of Transportation Act (Environmental Manual Chapter 15.)

☐ Due to the nature and scope of the project, no impacts to Section 4(f)-protected resources would be expected. Adequate supporting information is included in Part 3.1 above. No detailed analysis is necessary.

☒ Yes ☐ No Are there any parks, recreation areas, wildlife and or waterfowl refuges, or historic sites on or adjacent to the project.

4(f) Resources				
Resource	Use?	Type of Use (Permanent, Temporary, Constructive)	Documentation (De Minimis, Programmatic, Full 4(f))	Date of Completion
Swords Park	No		NA	NA
Zimmerman Park	No		NA	NA
Add Row	Delete Last Row			

☐ Yes ☒ No ☐ TBD Will there be a "use" of Section 4(f) protected sites?



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Explain

The proposed Skyline Trail will affect several properties owned by the City of Billings that are located along the Rims Overlook area immediately south of the MT Highway 3. Currently these sites include open gravel parking areas with a few garbage receptacles, with no amenities. Information was sought from the City Parks and Recreation Department to help determine if the City-owned properties meet the criteria of a Section 4(f) resource. The City Public Works Department sent a letter to Michael Whitaker, City of Billings Parks and Recreation Director, as the official with jurisdiction, dated August 31, 2021, seeking a significance determination on these properties based on four required criteria to qualify the properties as a Section 4(f) resource. Dated the same day, August 31, 2021, Michael Whitaker determined the affected City properties as "not significant" and therefore these properties are not afforded protection under Section 4(f). As such, no "use" of a Section 4(f) resource would occur. Documentation of the correspondence is attached.

**6.17 Section 6(f) of the National Land and Water Conservation Act** (Environmental Manual Chapter 32) or Similar Deed Restriction.

- ☐ Due to the nature and scope of the project, or the location, no impacts to protected resources would be expected. Adequate supporting information is included in Part 3 above. No detailed analysis is necessary.
- ☐ Yes ☒ No Have any of the parks, recreation areas, or other properties on or adjacent to the project been acquired (in fee or in easement) and/or improved with funds from the Land and Water Conservation Act of 1965, the Federal Aid in Fish Restoration Act, the Federal Aid in Wildlife Restoration Act, or other public-use money that includes deed restrictions or covenants on the property.

No additional analysis necessary.

**6.18 Social Impacts** (Environmental Manual Chapter 19.)

- ☐ Due to the nature and scope of the project, no social impacts would be expected. No detailed analysis is necessary.
- ☒ Due to the nature and scope of the work potential for minor or temporary social impacts are expected. A detailed analysis is not necessary. The following explanation will justify that the impact is not "significant".
- ☐ A detailed social impact analysis has been conducted and is documented in the file and/or in Section 7.

Explain not "significant".

The potential for social impacts as a result of the proposed project have been determined to be not significant. The proposed Inner Belt Loop road is being developed in currently vacant agricultural and grazing fields and will not result in the displacement or relocation of any businesses or residents. The proposed project is being developed consistent with the 2020 Inner Belt Loop Corridor Planning Study and the Highway 3 Corridor Study and is included in the adopted 2018 Long Range Transportation Plan. Social impacts resulting from the proposed project are anticipated to be largely beneficial due to the creation of eight miles of multi-use path and regional improvement to traffic congestion and air quality benefits.

**6.19 Tribal Lands/Issues** (Environmental Manual Chapter 31.)

- ☐ Yes ☒ No Is the project located within a current American Indian Reservation border?
- ☐ Yes ☒ No Is the project located outside a current American Indian Reservation border, but in an area of interest to the Tribal government?

Documentation of coordination with the Tribal government is on file for overall project coordination, and any coordination related to aquatic resource permitting, 401 certification, and/or history and cultural resources.

**6.20 Vegetation** (Environmental Manual Chapter 37)

- ☐ Due to the nature and scope of the project and the site, a seeding special provision is not necessary.
- ☒ A seeding provision will be included in the contract documents to ensure appropriate re-vegetation of disturbed areas.





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In accordance with Standard Specification 201, clearing and grubbing activities would occur only with staked construction limits.

To re-establish permanent vegetation and to reduce the spread and establishment of noxious weeds, disturbed areas within MDT right-of-way and easements would be seeded with desirable plant species, as soon as practicable, as recommended and determined feasible by the MDT Reclamation Specialist. The seeding mixture special provision will be included in the contract documentation.

Re-vegetation plan will conform to the requirements of 23 CFR 650 Subpart B. Post construction, the site would be monitored until final stabilization is met.

Additional information as needed. Document any deviations from standard procedures.

The City of Billings will include MDT Standard Specifications 201 and 208.03.5 in the final contract bid documents. The contractor will be required to wash all equipment prior to transport into the project area as specified in the MDT Supplemental Specification 208.03.5(A), Noxious Weed Management, to control the spread of noxious weeds. City of Billings will be responsible for developing construction contract special provisions and include coordination with a City/County reclamation specialist, as needed, to develop the seeding mixture special provision and determine appropriate revegetation plans.

Per standard City operating procedure, the construction contractor will be responsible for developing and implementing the Stormwater Pollution Prevention Plan (SWPPP) during construction of the project, including meeting final stabilization requirements as defined in Part 5 of the DEQ General Permit for Storm Water Discharges Associated with Construction Activity, which requires a vegetative cover with established density of at least 70 percent of the pre-disturbance levels, or completing equivalent permanent, physical erosion reduction methods. The City construction contract will include a two-year warranty period for all contractor work, meaning, that in addition to the DEQ General Permit requirements, the contractor will be held contractually obligated to ensure final stabilization and reclamation activities meet the regulatory requirements within two years of substantial completion of the project.

**6.21 Visual Quality/Aesthetics** (Environmental Manual Chapter 22)

☐ Yes ☒ No Will the project have the potential to impact roadside classification or visual aspects such as aesthetics, light, glare or night sky?

Additional information as needed. Document any deviations from standard procedures.

The proposed project will result in permanent changes to the visual character of the project area. Construction of the new Inner Belt Loop will replace existing vacant fields and rangeland. Subsequent development in the area is likely to include additional residential, commercial, and industrial development within the project area vicinity. The proposed project would complete a connector roadway that will reduce congestion in areas near downtown and is consistent with existing plans and zoning regulations. The proposed project, when taken in context with the surrounding built environment that includes the Billings Logan International Airport and residential development along MT-3, would not be a substantial contrast and the impact is therefore considered not significant. A context sensitive design approach has been implemented in accordance with the Inner Belt Loop Corridor Study design guidelines and associated public engagement conducted to date.

**6.22 Water Quality** (In accordance with MDT Standard Specifications 107 and 208, the contractor would be required to adhere to applicable water quality rules, regulations, and permit conditions.).

☐ Due to the nature and scope of the project, no impacts to water quality would be expected. Adequate supporting information is included in Part 3. No detailed analysis is necessary.

**6.22.a Groundwater** (Domestic and irrigation well impacted by the project will be mitigated with the landowner)

☐ Yes ☒ No Are Public Water Supply Wells located on or adjacent to the project?

No additional analysis necessary.

**6.22.b Underground Injection Control (UIC) Program Under the Safe Drinking Water Act (SDWA)**

☐ Yes ☒ No ☐ N/A ☐ TBD Will the project include stormwater drainage wells such as dry wells, bored wells, and infiltration galleries that are regulated as Class V injection wells by EPA under the NPDES program.



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Explain

The proposed project does not include any stormwater drainage wells regulated as Class V injection wells by the EPA.

6.22.c Stormwater - Temporary Erosion and Sediment Control

MDT's contractor will be contractually obligated to provide temporary erosion and sediment control in accordance with FHWA rules at 23 CFR 650 Subpart B and applicable stormwater permit requirements at the MPDES and/or NPDES.

6.22.d Stormwater - Permanent Erosion and Sediment Control (PESC) *(If the scope of the project includes a rehabilitation or reconstruction, evaluate need for incorporation of PESC and discussed this with Road Design and Hydraulics.)*

☒ Due to the nature and scope of the project and the site, a PESC analysis is not necessary.

Explain No Analysis

No existing concerns of erosion have been identified. The proposed design incorporates sediment and erosion control measures, as appropriate, such as erosion control blankets lining ditches, rip rap lined culvert outfalls, and ditch blocks to control the quantity and quality of storm water.

6.22.e Stormwater - Local Requirements *(Discuss compliance with local stormwater requirements with Road Design and Hydraulics.)*

☐ Due to the nature and scope of the project and the site, local stormwater requirements do not apply.

☒ Local stormwater requirement apply that are being coordinated with personnel on the Design Team.

Describe Local Stormwater Requirements:

The proposed project is located partially within the Billings MS4 boundary and, as such, will be evaluated for the applicability of the requirement to incorporate Low Impact Development (LID) practices to comply with post-construction storm water management controls. This analysis will be conducted during final design and following additional site evaluations and will be documented on file.

Explain

6.23 Wild and Scenic Rivers *(Environmental Manual Chapter 35)*

☐ Yes ☒ No Will the proposed project require work in, across or adjacent to a Wild and Scenic River?

Additional information as needed: There are no rivers designated as Wild and Scenic within or in the vicinity of the project area.

Part 7 - Additional MDT Discussion/Comments



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Part 8 - FHWA Comments

The following information provides additional details for certain resource categories, particularly for sections of this form that require additional information where no space is provided.

**PART 6.2, Air Quality:** The proposed project meets the applicable conformity requirements found in 40 CFR Part 93 for project-level air quality conformity. Inter-agency consultation has been completed to meet the state-level transportation conformity consultation requirements and procedures found at ARM 17.8.1305 through 17.8.1306. Correspondence with the EPA, Montana DEQ, and Yellowstone County RiverStone Health are attached. The proposed Inner Belt Loop BUILD project is included as a committed project in the 2018 Billings Urban Area LRTP, which has been determined to meet the applicable air quality conformity requirements found in 40 CFR Part 93, Subpart A. The proposed project is being processed as an unlisted categorical exclusion under 23 CFR 771.117(d) and, therefore, an MSATs analysis was completed per FHWA's guidance document entitled, "Interim Guidance Update on Air Toxic Analysis in NEPA documents". An Initial Site Assessment (ISA) form and additional analysis has been completed as identified in Part 6.2 and documentation is attached.

**PART 6.7, Farmland Protection Policy Act:** The proposed roadway improvements will require conversion of farmland subject to the requirements of the Farmland Protection Policy Act (FPPA). In accordance with the FPPA, a Farmland Conversion Impact Rating for Corridor Type Projects Form (NRCS-CPA-106) has been processed for the proposed project in consultation with the NRCS and documentation is attached.

**PART 6.19, Tribal Lands/Issues:** The Crow Tribe Tribal Historic Preservation Officer (THPO) was contacted by Travis Harris, City Engineer, on August 10, 2021, to introduce to the project, provide a copy of the June 2021 Cultural Resources Inventory, and request comment. An additional follow-up email was sent on September 28, 2021. No comments from the Crow Tribe THPO have been received.

Part 9 - FHWA Signature Rationale

☒ Yes ☐ No Is FHWA Concurrence on the CE necessary?

Explain why FHWA concurrence is necessary:

☒ Action is not listed in 23 CFR 771.117.

☐ Action is listed in 23 CFR 771.117, no PA threshold is exceeded, but MDT is requesting FHWA concurrence.

☐ Action is listed in 23 CFR 771.117, but a PA threshold is exceeded as documented below. Actions listed in 23 CFR 771.117 that exceed any of the thresholds below may not be approved by MDT. MDT May certify to FHWA that the action qualified for a CE. FHWA concurrence is required for the CE to be valid.

If "yes" is answered for any item below, FHWA concurrence is required.

Abbreviated Signature Triggers from Programmatic Agreement	Yes/No
9.a. RIGHT-OF-WAY. The action involved acquisition of more than a minor amount of ROW.	No
9.b. RIGHT-OF-WAY. The action involved acquisition that results in residential or non-residential displacements.	No
9.c. RIGHT-OF-WAY. The action includes acquisition of land for hardship or protective purposes, or each acquisition pursuant to the Federal acquisition project.	No
9.d. CAPACITY. The action results in capacity expansion of a roadway by addition of one or more through lanes.	Yes
9.e. ACCESS. The action involves the construction of temporary access, or the closure of existing road, bridge, or ramps, that would result in major traffic disruptions.	No
9.f. ACCESS. The action results in changes in access control that affect traffic patterns.	No
9.g. HISTORIC PROPERTIES. The action results in a determination of adverse effect on historic properties pursuant to Section 106 of the NHPA.	No





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9.h. SECTION 4(f). The action requires the "use" of properties protected by Section 4(f).	No
9.i. SECTION 6(f). The action requires the acquisition of lands under the protection of Section 6 (f) or other unique areas or special lands that were acquired in fee or easement with public-use money and have deed restrictions or covenants on the property.	No
9.j. CWA SECTION 404. The action requires an Individual CWA Section 404 permit.	No
9.k. FLOODPLAIN PERMIT. The action requires work encroaching on a regulatory floodway or work affecting the base floodplain (100-year flood) elevations of water course or lake, pursuant to Executive Order (EO) 11988 and 23 CFR 650 Subpart A.	No
9.l. WILD AND SCENIC RIVERS. The action requires construction in, across, or adjacent to a river designated as a component of, or proposed for inclusion in, the National System of Wild and Scenic Rivers published by the US Department of the Interior/US Department of Agriculture.	No
9.m. NOISE. The action is defined as a "Type I Project" per 23 CFR 772.5 and MDT's Noise Policy.	Yes
9.n. T&E SPECIES and CRITICAL HABITAT. The action may affect federally listed or candidate endangered species, or proposed or designated critical habitat or projects with impacts subject to the conditions of the Bald and Golden Eagle Protection Act.	No
9.o. AIR QUALITY. The action does not conform to the State Implementation Plan (SIP) which is approved or promulgated by the US Environmental Protection Agency (EPA) in air quality non-attainment areas.	No
9.p. STIP. The action is not included in or is inconsistent with the statewide transportation improvement program (STIP), and in applicable urbanized areas, the transportation improvement plan.	No

In accordance with the provisions of 23 CFR 771.117(a), this pending action would not cause any significant environmental impacts. Additionally, this pending action would not involve unusual circumstances as described at 23 CFR 771.117(b) or ARM 18.2.261(2). The proposed project is appropriately fiscally constrained in accordance with 23 CFR 450.104.

### Approval Signatures

	Mac Fogelson, City Engineer	10/22/2021
Local Agency Approving Authority		Date
N/A - Document was not prepared for or by MDT Environmental Services		
MDT Environmental Services Project Development Engineer		Date
N/A - Document was not prepared for or by MDT Environmental Services		
MDT Environmental Services Engineering Section Supervisor		Date
		October 27, 2021
Federal Highway Administration		Date

☐ Standard Distribution List☐ Maintenance Distribution List☐ Custom Distribution List