

March 10, 2009

FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED GOVERNMENTAL AGENCIES AND PUBLIC GROUPS

As required by state and federal rules for determining whether an Environmental Impact Statement is necessary, an environmental review has been performed on the proposed action below:

Project	City of Billings Water and Sanitary Sewer 2009 Rehabilitation Project
Location	Billings, Montana
Project Number	SRF Wastewater C302214-01 SRF Water not assigned yet
Total Cost	\$13,380,330 (water and wastewater)

The City's Water and Wastewater Facility Master Plan 2006, 2009 Sewer and Water Replacement Project Preliminary Design Report (PDR), both prepared by Morrison Maierle, Inc, and subsequent recurring maintenance issues have identified the need to rehabilitate and/or replace several sections of underground water and sewer utilities within the City. The wastewater mains require improvements due to high infiltration, frequent blockages or breaks, conduit age and other factors. The improvements will reduce the overall maintenance requirements and increase system reliability. The water improvements are selected to improve the City of Billings drinking water distribution system by replacing water mains that are deteriorating due to age (or other reasons, such as corrosion) or that need replacing due to service problems.

Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species, and historical sites will not be adversely impacted as a result of the proposed project. No significant long-term environmental impacts were identified. An environmental assessment (EA), which describes the project and analyzes the impacts in more detail, is available for public scrutiny on the Department of Environmental Quality website: www.deq.mt.gov or at the following locations:

Department of Environmental Quality
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-09011
jpaddock@mt.gov

City of Billings
Public Works Department
2251 Belknap Avenue
Billings, MT 59101

Comments on the EA may be submitted to the Department of Environmental Quality at the above address. After evaluating substantive comments received, the department will revise the environmental assessment or determine if an environmental impact statement is necessary. If no substantive comments are received during the comment period, or if substantive comments are received and evaluated and the environmental impacts are still determined to be non-significant, the agency will make a final decision. No administrative action will be taken on the project for at least 30 calendar days after release of the Finding of No Significant Impact.

Sincerely,

Todd Teegarden, Bureau Chief
Technical and Financial Assistance Bureau

WATER DISTRIBUTION AND SANITARY SEWER 2009 REHABILITATION PROJECT
ENVIRONMENTAL ASSESSMENT

I. COVER SHEET

A. PROJECT IDENTIFICATION

Applicant: City of Billings
Address: Public Works Engineering Division
2251 Belknap Avenue
Billings, MT 59101
Project Number: SRF WASTEWATER C302214-01
SRF WATER not assigned yet

B. CONTACT PERSON

Name: Randy Straus P.E.
Address: Public Works Department
2251 Belknap Avenue
Billings, MT 59101
Telephone: (406) 657-8801

C. ABSTRACT

The City's Water and Wastewater Facility Master Plan 2006 and 2008-2009 City of Billings Replacement Projects Preliminary Design Reports (PDR), both prepared by Morrison Maierle, Inc, and subsequent recurring maintenance issues have identified the need to rehabilitate and/or replace several sections of underground sewer and water utilities within the City. The wastewater mains require improvements due to high infiltration, frequent blockages or breaks, conduit age and other factors. The improvements will reduce the overall maintenance requirements and increase system reliability. The water mains required improvements due to deterioration due to age or corrosion or that need replacing due to service problems.

A total of \$4.0 million per year from 2008 to 2011 has been included in the current Capital Improvement Plan (CIP) budget to allow the sewer line replacements. For the wastewater improvements, the cost is estimated at \$7,845,000, all of which will be funded with a loan from the State Revolving Fund loan program. The estimated cost of the water distribution system improvements project is \$5,535,330 million. For the water distribution improvements, a loan for \$3.5 million will be obtained from the State Revolving Fund Loan Program with the balance paid by the city.

Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species and historical sites are not expected to be adversely impacted as a result of the proposed projects. Additional environmental impacts related to land use,

water quality, air quality, public health, energy, noise, and growth were also assessed. No significant long-term environmental impacts were identified.

Under the Montana Water Pollution Control State Revolving Fund Act and the Montana Drinking Water State Revolving Fund Act, the DEQ may loan money to municipalities for construction of public sewage and drinking water systems.

The project will be constructed using standard construction methods and to minimize or eliminate pollutants during construction, best management practices will be implemented. A Stormwater Discharge General Permit and a construction-dewatering permit from the DEQ may be required prior to construction. Plan and specification review and approval is required by the State Revolving Fund (SRF) section of the DEQ for this project.

The DEQ, Technical & Financial Assistance Bureau, has prepared this Environmental Assessment (EA) to satisfy the requirements of the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA).

D. COMMENT PERIOD

Thirty (30) calendar days

II. PURPOSE OF AND NEED FOR ACTION

The City's Water and Wastewater Facility Master Plan 2006 and 2009 City of Billings Replacement Projects Preliminary Design Report (PDR), both prepared by Morrison Maierle, Inc, and subsequent recurring maintenance issues have identified the need to rehabilitate, construct and/or replace several sections of underground water and sewer utilities within the City.

The City of Billings is located in South Central Montana along the Yellowstone River. The location of Billings can be seen on the enclosed map in Figure 1A. The 2006 Water and Wastewater Facility Master Plan defined a service/planning area which includes approximately 28 square miles and serves approximately 97,053 people. See Figure 1A.

A. WASTEWATER FACILITIES

The City wastewater collection system includes 415.1 miles of gravity-flow pipeline (mains), 7,932 manholes, and six lift stations pumping sewage through approximately 15,000 feet of force main. The existing wastewater treatment facility is designed to treat 26 mgd. Most of the older mainline pipe, installed prior to the 1970's, is constructed of vitrified clay pipe. However, old larger diameter pipe, 15-inches and greater, is constructed with reinforced concrete pipe. The physical condition of the pipe generally varies with age. Old pipe typically result in high infiltration, and frequent blockages or breaks. Infiltration was estimated in 2005 to be approximately 2.6 million gallons per day (mgd) in the winter (19% of total system flow), 6.1 mgd in the summer (36% of total system flow) and the average annual infiltration in the system is estimated to be 4.63 mgd or 30 percent of total system flow. Infiltration increases the pumping costs and decreases the treatment capacity of the treatment facility. Other problems associated with deteriorating pipe include collapsed mains, root penetration, and service backup. All these problems cause high maintenance for the city, can be a health risk for the maintenance people and the homeowners and businesses that the

system serves.

The CIP includes a project list for all upcoming funding needs for FY 2006 through FY 2011. The replacement of 2 percent of the City sewer collection system per year, or approximately 44,000 linear feet would achieve a 50-year turnover of existing pipelines. In the past 27 years, from 1979 to 2005, the total pipe length replaced in the wastewater collection system has been 168,000 linear feet, or an average of only 6,200 linear feet per year. In 2006 the City replaced 17,900 linear feet of sanitary sewer pipe and was scheduled to replace 17,400 linear feet in 2007. The 2007 project cost approximately \$4.4 million, but included some new sewer line extension. No construction was completed in 2008, but improvements originally proposed in 2008 will be completed during the 2009 construction season with the proposed 2009 improvements. A reliable collection system is critical for the environment and the health and safety of the community. Recent corrective measures taken by the City to repair pipelines have resulted in some decrease in infiltration and the city has an ongoing program to regularly replace other leaking pipes.

A total of \$4.0 million per year from 2008 to 2011 (\$16,000,000 total) has been included in the current CIP budget to allow the sewer line replacements.

B. WATER FACILITIES

The drinking water distribution system improvements are necessary in order to address deficiencies and to continue to provide the City of Billings water users with a safe, reliable water supply. The main health issue, associated with the current water system, is the potential to contaminate the system with groundwater through deteriorating pipes and valves. If a deteriorating water main breaks, the break could also cause a loss of water service or fire service.

A sound water distribution system is important for public health and safety. Replacing these water mains will reduce the public health and safety risk to the residents and visitors of the City of Billings.

Approximately \$17.0 million over the next five years was recommended in the Water and Wastewater Facilities Master Plan 2006 to allow for water line replacements.

III. ALTERNATIVES INCLUDING THE PROPOSED ACTION AND COSTS

A. WASTEWATER COLLECTION SYSTEM

1. NO ACTION

If no action is taken to replace these aging sewer mains, the pipe lines will continue to deteriorate and may cause contamination of the groundwater and the surrounding soil. The drinking water pipe is typically located near the wastewater mains (typically 10 feet of separation); therefore contamination of the drinking water system is a possibility if the wastewater lines leak. If the sewer pipelines continue to deteriorate, infiltration of groundwater and root intrusion into the sewer mains will occur, both of which may cause increased wastewater backups and maintenance issues. The infiltration of groundwater will increase the overall volume of water the wastewater treatment facility must treat, which decreases the capacity of the treatment facility to treat actual

wastewater sewage. Based on these concerns, the no action alternative was not recommended.

2. PROPOSED ACTION

Where existing pipe will be replaced with new pipe, the use of trenchless technology and open cut excavation (trenching) were evaluated in detail. Trenchless technology will be used in some locations where the existing pipe is structurally sound and does not have significant dips or sags.

Open cut excavation or trenching of pipe is the industry standard for underground pipe work. Open cut excavation typically includes removal of the existing surface improvements (asphalt and landscaping), removal of the soil to expose the existing pipe, removal of the old pipe, placement of the new pipe, and replacement of the soil (backfill) and surface material. This process typically requires substantial traffic control and causes significant public inconvenience in the project areas. Trenchless technology minimizes the surface disruption because open trenching is not necessary to replace the all the existing pipe. Access to the existing pipe is typically provided at both ends of the existing pipe in existing manholes. The existing pipe is either replaced with a slightly smaller pipe (relined) or the existing pipe can be busted and a new pipe pulled in to replace the old pipe. One advantage of “pipe bursting” is that the pipe size can be increased if the soil conditions are favorable. Trenchless technology typically provides less public inconvenience such as traffic congestion and surface repairs.

Some locations will require the existing pipe to be replaced using the traditional open excavation method due to pipe conditions, other utilities, parallel sewer pipes, or constructability conditions. In several locations either construction method will be possible, and the intent of the City is to prepare the contract documents to allow the contractor to provide a cost for either method, which will allow the City to choose the method most beneficial to the City (most likely the least expensive method).

In most cases, the existing pipe will be replaced with new pipe of the same size. The slope of the new pipe will be controlled by the existing inlet and outlet structures (manholes at each end of the pipe segment), resulting is several locations with less than optimal slopes. The final design will address these issues as much as possible. In all locations, construction will occur within the existing right-of-ways or dedicated easements, and as discussed above will typically be installed in the same location as existing mains.

The proposed wastewater collection system improvements are located in four areas (Zones A, B, E, and F). A description of the areas, specific location, the proposed improvements, and costs are included in Table 1.

TABLE 1

Location	Location	Proposed Improvement	Estimated Const. Cost
Area 1 Zone A	In the alley between Lillis Lane and Burlington Avenue from 25 th Street West to Parkview Drive, in the alley between Burlington Avenue and Lewis Avenue between Lewis Avenue and Clark Avenue from 25 th Street West to Parkview Drive, in the alley between Yellowstone Avenue and Wyoming Avenue from 25 th Street West to Parkview Drive (See Figure 2 at back of assessment)	Rehabilitate existing 8-inch sewer with 8-inch PVC sewer pipe or 8-inch cast-in-place-pipe (CIP), approximately 6,635 lineal feet of pipe. Includes the installation of 23 new manholes, service connections, and connections to the existing system.	\$1,521,405
Area 2 Zone B	Between Avenue B and Avenue C from Virginia Lane to 8 th Street West; and between Grand Avenue and Avenue B from Virginia Lane to 8 th Street West. (See Figure 2 at back of assessment)	Rehabilitate existing 8-inch sewer with 8-inch PVC sewer pipe or 8-inch cast-in-place-pipe (CIP) (where pipe grades will allow this technology to be used), approximately 4,425 lineal feet of pipe. Includes the installation of approximately 13 new manholes, service connections, and connections to the existing system.	\$1,014,653
Area 3 Zone E	In 24 th Street West from Broadwater to Central Avenue (See Figure 3 at back of assessment)	Rehabilitate existing 8-inch pipe with 8-inch PVC sewer pipe. Rehabilitate existing 10-inch with 10-inch PVC sewer pipe. Cast-in-place pipe (CIP) will be utilized where cost effective. Project will include approximately 615 lineal feet of 8-inch pipe, 1,285 linear feet of 10-inch pipe, installation of 10 new manholes, service connections, and connections to the existing system.	\$435,670
Area 4 Zone F	In East and West Macdonald Drive (See Figure 4 at back of assessment)	Rehabilitate existing 8-inch pipe with 8-inch PVC sewer pipe. Cast-in-place pipe will be utilized where cost effective. Project will include approximately 2,400 lineal feet of 8-inch pipe, installation of 10 new manholes, service connections, and connections to the existing system	\$550,050

The 2009 proposed wastewater main improvements for all four areas are estimated to cost \$7,845,000 which includes engineering, administration, construction, and contingency costs. The entire wastewater project will be funded using a 20-year low interest loan (3.75%) from the State Revolving Fund Loan Program. In early 2008 the City had a Water and Wastewater Rate and Fee Study Report (WWRFWR) that planned for long-term (FY 2009 through 2016) costs for O&M, capital expenditures and repair and replacements of the water and wastewater system. The WWRFWR recommended the City increase rates and set system development fees based on the City's current Capital Improvement Plan (and budget) to allow the replacement of sanitary sewer lines. The budget included other upgrades and improvements to the system, but the approximate financial impact of this project on the system users is shown in Table 2. Based on the EPA guidance for project affordability, the proposed project will result in a monthly cost per household that is 0.40% of the monthly median household income and therefore is not expected to impose an economic hardship on household income.

TABLE 2 WASTEWATER PROJECT AFFORDABILITY	
Existing Monthly wastewater service rate	\$13.72
New monthly debt service and O&M increase	\$ 0.81
Total monthly user cost ¹	\$14.39
Monthly median household income (mMHI) ²	\$3,573.00
User rate as a percentage of mMHI	0.40 %

¹ Uniform Application for Montana Public Facility Projects and 2009 PER/PDR

² Based on 2005-2007 American Community Survey 3-year estimate

The use of open cut excavation and trenchless technology will provide a cost effective project, will meet environmental and regulatory compliance, will be compatible with existing facilities, will be the most constructible, and the new piping will provide less maintenance than the existing piping. It was determined that the open cut excavation and trenchless technology approach meets the requirements to protect environmental quality, reduce maintenance, energy costs, and achieve regulatory compliance.

B. WATER DISTRIBUTION SYSTEM

1. NO ACTION

The "no action" alternative was not considered beyond initial screening. This alternative will not remedy the problems, but would simply defer them to the future and allow problems to accumulate and perhaps increase in severity. As water mains deteriorate, the possibility of water system contamination and loss of water service will increase. The no-action alternative was ruled out based on the public health and safety concerns.

2. PROPOSED ACTION

24th Street West from Broadwater to Central Avenue - Construction of approximately 2,750 lineal feet of 16-inch ductile iron water main (see Figure 3). The approximate

cost for construction of this part is \$825,000.

East and West Macdonald Drive - Construction of approximately 2,500 lineal feet of 8-inch PVC water main (see Figure 4). The approximate cost for construction of this part is \$625,000.

Orchard Lane from King Avenue to Central Avenue - Construction of approximately 5,400 lineal feet of 16-inch ductile iron water main (see Figure 5). The approximate cost for construction of this part is \$1,350,000.

Central Avenue from Santa Fe Drive to 25th Street West – Construction of approximately 1,300 lineal feet of 12-inch PVC water main (see Figure 6). The approximate cost for construction of this part is \$325,000.

Santa Fe Drive from Beloit Drive to Central Avenue - Construction of approximately 2,500 lineal feet of 8-inch PVC water main (see Figure 6). The approximate cost for construction of this part is \$625,000.

Fair Park Drive from Beloit Drive to South Santa Fe Drive - Construction of approximately 1,700 lineal feet of 8-inch water main (see Figure 6). The approximate cost for construction of this part is \$406, 250

The water main replacement work will take place within the existing city street and alley right-of-ways. All portions of the replacement work will be done using open-cut excavation and will require surface restoration.

The total budgeted costs for the above projects including Administration, Construction Engineering and Contingencies is estimated at \$5,535,330. These costs will be paid for using a \$3,500,000 loan from the State Revolving Fund (SRF) Loan Program and \$2,035,330 from city water reserves. The SRF loan will be for 20 years at a rate of 3.75%. Based on calculations seen in the Uniform Application for Montana Public Facility Projects this would result in an increase of \$0.72 per average residential customer. This increase is not expected to impose an economic hardship on household income.

IV. AFFECTED ENVIRONMENT

A. STUDY AREA

The City of Billings is located in South Central Montana along the Yellowstone River. The location of Billings can be seen on the enclosed map in Figure 1A.

Water and sewer replacement will occur within the existing right-of-ways or dedicated easements within the Billings city limits (See Figures 2 through 6 and Table 1). Approximately 15,360 feet of sewer main will be replaced or rehabilitated and 16,000 feet of water main will be replaced or rehabilitated in previously developed residential, commercial, and industrial areas. Construction is scheduled to begin in the spring of 2009 and end in the fall of 2009.

B. POPULATION AND FLOW PROJECTIONS

The population of the entire Billings service area is 97,053 people (2005-2007 American Community Survey 3-year estimate). Only a small portion of that entire population will be affected by the main replacements which are essentially taking place on a neighborhood level. No significant growth is forecast as a result of the main replacement projects. The project simply replaces existing mains in existing developed areas. In 2005 the average annual infiltration in the system is estimated to be 4.63 mgd or 30 percent of total system flow. Based on wastewater treatment plant flow monitoring, it appears that previous collection system sewer main improvement projects have been effective at reducing infiltration. It is expected the proposed collection system improvements will have a similar effect on infiltration and further reduce sewer system flows.

The Standards for Water Works of MDEQ Circular DEQ 1 and Design Standard for Wastewater Facilities of MDEQ Circular DEQ 2 will be required to be met for both the design and construction of the replacement mains. The standards require that water mains be designed to maintain a minimum pressure of 20 pounds per square inch (psi) under all conditions of flow and 35 psi under normal conditions. The standards also govern pipe materials and bedding and sanitary protection of the water system and sanitary delivery of a temporary supply of water and disposal of wastewater during construction.

C. NATURAL FEATURES

The subsurface soil profile in the immediate project area consists of unconsolidated (Quaternary) alluvium of the Yellowstone River Valley which is as much as 120 feet thick. Bedrock below the alluvial soils throughout most of Billings generally consists of dark gray to black shale with thin sandstone and sandy shale seams. The elevation of project areas range from 3140 to 3220 feet above sea level, but each project location (Zone) generally includes mild grades (street/alley grades).

The depth to groundwater in the study area varies both with location and season. If groundwater is present during construction, dewatering of trenches may require a construction dewatering permit. Also, if groundwater is encountered construction methods will be adjusted. No adverse impacts to groundwater are expected.

The average precipitation for the city of Billings is 14.6 inches per year.

D. MAPS

Figure 1A shows the general location of the City of Billings within the state of Montana. Figure 1B shows the City of Billings Planning area. Figures 2 through 6 show the location of the proposed improvements within the city.

V. ENVIRONMENTAL IMPACTS OF PROPOSED PROJECT

A. DIRECT AND INDIRECT IMPACTS OF PROPOSED PROJECT

Land Use - All of the system improvements will involve replacement of existing main and will be located within the existing City right-of-way (streets or alleys) or easements owned and/or

maintained by the City. The land use in the study area is residential, commercial, and industrial. No adverse affects to any of these uses is expected.

Soils Suitability, Topographic and Geologic Constraints - No soil, topography or geological constraints are present for the proposed water and wastewater projects. Based on the existing conditions and soils types, the impacts of the proposed water project will have no significant effect on the soils or topography. There is a potential for the discovery of hydrocarbon contaminated soils in some locations. It will be unknown until construction occurs if contaminated soils will be encountered. If contaminated soils are encountered, they will be removed and replaced with clean soils in accordance with MDEQ regulations and guidance if necessary.

Fish and Wildlife and Biological Resources - The construction of the recommended improvements will not impact endangered or threatened species since the work will be accomplished on public rights-of-way or negotiated easements. No construction related impacts are anticipated to wildlife habitats, fisheries or other animals.

Fauna - Fauna of the general area consists of typical mammalian species found in the intermountain west, including mule deer, whitetail deer, coyote, rabbit, skunk, rodents and others. Common bird species include the black-billed magpie, American robin, Canadian goose, osprey, blackbird, sparrow, warbler, common waterfowl, other raptors, game birds and others.

Vegetation - Vegetation types in the Billings area consists of introduced and native species of landscaping trees, shrubs and grasses. There are some areas of natural vegetation in the river corridors that consist of native riparian flora.

The main replacements are taking place in developed roads and streets and should have no impact on to sensitive plant species.

Water Resource Issues - No significant adverse impacts to surface or groundwater will result from the proposed project. Groundwater quality may improve as leaking sewer mains are replaced.

Floodplain - The proposed projects are not located within a delineated floodplain and therefore this project does not require a floodplain development permit.

Wetlands - No adverse impacts to wetlands will occur due to this project. If final design prescribes the placement of fill material in any jurisdictional area as a permit may be required.

Cultural Resources & Historical Sites - Since the proposed construction sites occur within previous disturbed areas, the State Historic Preservation Office indicated that there is a low likelihood that cultural properties in the area will be impacted by the type of work contemplated in this report. Should cultural materials be inadvertently discovered during construction, construction will be stopped and the State Historic Preservation Office will be contacted.

Socio-Economic Issues - The population served by this water system is not considered to be disadvantaged either by minority or income status. No adverse human health or socio-economic impacts are expected as a result of these main replacement projects.

Air Quality - Short-term negative impacts on the air quality will occur from heavy equipment,

dust and exhaust fumes during project construction. Proper construction practices and dust abatement measures must be specified during construction to control dust, thus minimizing this problem. No long-term air quality problems will result from this project.

Energy - During construction of the proposed project, additional energy will be consumed, resulting in a direct short-term increased demand on this resource. The project will eliminate leaking water mains and reduce wastewater flow to the wastewater treatment facility which will reduce pumping costs and save energy in the long-term operation of the utility treatment systems.

Public Health – Public health will be protected and improved due to these projects. Improvements to the sewer main will reduce the potential for sewage backups/overflows and the required maintenance related activities by the City staff. In addition, the infiltration of groundwater will be reduced, resulting in improved treatment of the wastewater. Improvements to the water mains will improve service and reduce the potential for contamination.

Noise - Short-term impacts from excessive noise levels may occur during the construction activities. The construction period will be limited to normal daylight hours to avoid early morning or late evening construction related disturbances. In the long-term, no increase in noise levels associated with this project will occur.

Growth - No significant growth is forecast as a result of the main replacement projects. The projects simply replace existing mains in existing developed areas.

Cumulative Effects – This project involves the replacement of existing water and sewer mains and will have no significant cumulative adverse effects on resources, ecosystems or human communities.

B. UNAVOIDABLE ADVERSE IMPACTS

Short-term construction related impacts, such as noise, dust and traffic disruption, will occur but should be minimized through proper construction management. Energy consumption during construction cannot be avoided.

All of the mains will be constructed within the street right-of-way or alley ways; therefore street surface restoration will be required. Also, access to and from homes during construction will take special consideration. Short-term water outages and temporary above ground water supply will likely be necessary during construction. DEQ 1 design standards require that the specifications cover temporary supply of water to residents in a safe and sanitary manner.

VI. AGENCY ACTION, APPLICABLE REGULATIONS, AND PERMITTING AUTHORITIES

All wastewater conveyance improvements will be designed to meet Montana DEQ requirements. Proper State regulatory review and approval of the project plans and specifications will be provided. All applicable local, federal and state permits will be required including, but not limited to, a stormwater discharge permit and a construction-dewatering permit if needed.

All appropriate easements and access will be addressed with regards to the water and sewer system infrastructure.

VII. PUBLIC PARTICIPATION

Between March 18 and March 20, 2008 letters were sent out to property owners directly adjacent to the project informing them that a public meeting would be held on April 1, 2008 to discuss the project. Public comments at this meeting primarily focused on project cost to the property owners, individual access requirements (during construction), and project schedules. A second public meeting was held on May 30, 2008 for public input on the proposed project. No one from the general public attended the second meeting and therefore there were no public comments on the project. An additional public meeting was held on February 17, 2009 to discuss the 2009 wastewater projects. No one from the general public attended the meeting and therefore there were no public comments on the project.

VIII. REFERENCE DOCUMENTS

The following document has been utilized in the environmental review of this project and is considered to be part of the project file:

1. 2009 City of Billings Replacement Project Preliminary Design Report (Sewer) prepared for the City of Billings, by Morrison Maierle, Inc., Billings, Montana, February 26, 2009.
2. 2009 City of Billings Replacement Project Preliminary Design Report (Water), prepared for the City of Billings, by Morrison Maierle, Inc., Billings, Montana, January 5, 2009.
3. Uniform Application Form for Montana Public Facility Projects for the City of Billings Sewer and Water Replacement Projects, Updated February 18, 2009.

IX. AGENCIES CONSULTED

The following agencies have been contacted in regard to the PER, which determined the basis for the proposed wastewater treatment and collection system project:

1. The Montana Department of Fish Wildlife and Parks (FWP). Did not have specific comments on the project and no concerns about impacts to fisheries habitat or wildlife.
2. The U. S. Fish and Wildlife Service (FWS) was asked in a letter by the project consultant for comments on the proposed project. The FWS did not respond.
3. The Montana State Historic Preservation Office (SHPO) considered the impacts of the proposed project on historical sites and determined there is a low likelihood cultural properties will be impacted. The Montana State Historic Preservation Office asks to be contacted and the site investigated should cultural materials be inadvertently discovered during construction.
4. The U.S. Army Corps of Engineers (COE) was asked in a letter by the project consultant for comments on the proposed project. Based on the information provided, the COE responded that it does not appear that any jurisdictional waters will be impacted by this

project. However, the COE does ask to be contacted if final design prescribes the placement of fill material in any jurisdictional area as a permit may be required.

5. Department of Natural Resources and Conservation (DNRC) was asked in a letter by the project consultant for comments on the proposed project. The DNRC has not responded, however the project will not include work within any designated floodplain and therefore no floodplain is needed.

Recommendation for Further Environmental Analysis:

EIS More Detailed EA No Further Analysis

Rationale for Recommendation: Through the Preliminary Design Report (PDR), prepared by Morrison Maierle, Inc., the Water and Wastewater Facilities Master Plan 2006, and the public process involved, the City of Billings determined that the replacement of certain deteriorated water distribution and wastewater conveyance systems will improve the operation and maintenance capabilities of their systems. Through this EA, the MDEQ has verified none of the adverse impacts of the proposed 2009 Sewer and Water Replacement Project are significant; therefore an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607, 17.4.608, 17.4.609 and 17.4.610. This EA is the appropriate level of analysis because none of the adverse effects of the impacts are significant. A Finding of No Significant Impact (FONSI) will be issued and legally advertised in the local newspaper and distributed to a list of interested agencies. Comments regarding the project will be received for 30 days before final approval is granted.

EA Prepared By:

Jerry Paddock P.E.

Date

Robert Ashton

Date

Approved By:

Mike Abrahamson P.E.

Date



FIGURE 1A
LOCATION MAP

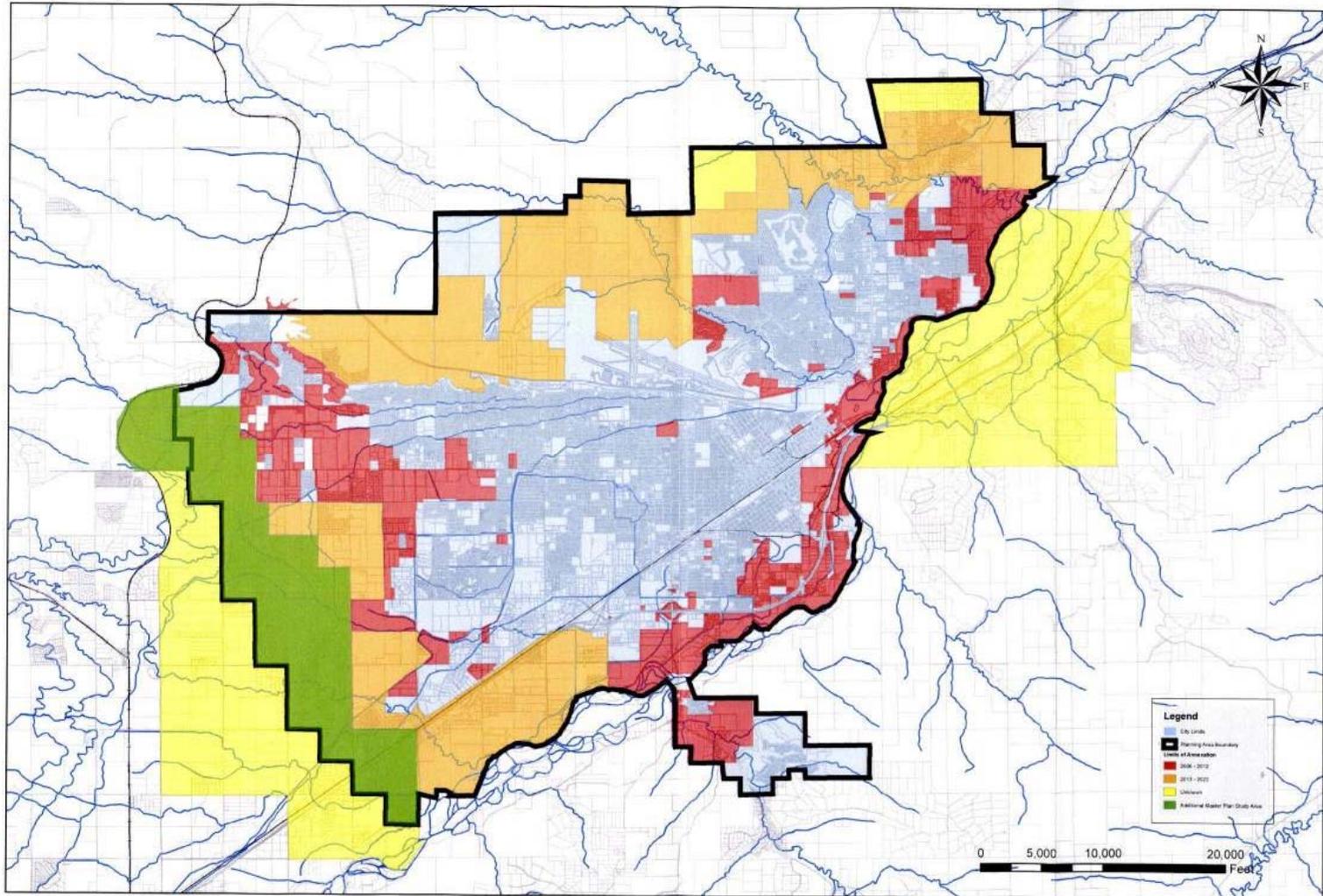


Figure No.: 1-1
Date: June 2006

City of Billings Water & Wastewater Master Plan
Master Plan Planning Area

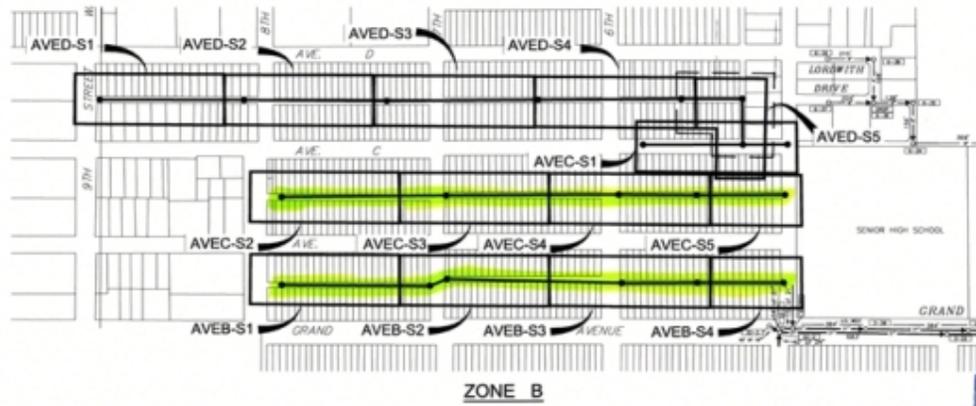


FIGURE 1B
PLANNING AREA



ZONE A

70% DESIGN
NOT FOR CONSTRUCTION
ISSUED 1-23-09



ZONE B

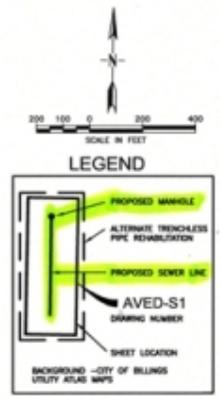


FIGURE 2

NO.	DESCRIPTION	REVISIONS	DATE	BY

DOWL HKM
222 N. 24th St., Suite 700
Billings, MT 59101-1918
406-592-8282

MORRISON MAIERLE, INC.
An Engineering/Construction Company

115 28th Street, Suite 102
Billings, MT 59101
Phone: (406) 592-4555
Fax: (406) 592-3432

DESIGNED BY: JLL
DRAWN BY: JLL
CHECKED BY: JLL
DATE: 2/20/09
C.A. REVER
BY: JLL

BILLINGS
2008-2009 SEWER
REPLACEMENT PROJECTS
SCHEDULE 2
AREA MAP
ZONE A AND B SEWER PROJECTS
MONTANA

PROJECT NUMBER: 088-19-211
SHEET NUMBER: 5
DRAWING NUMBER: G-5

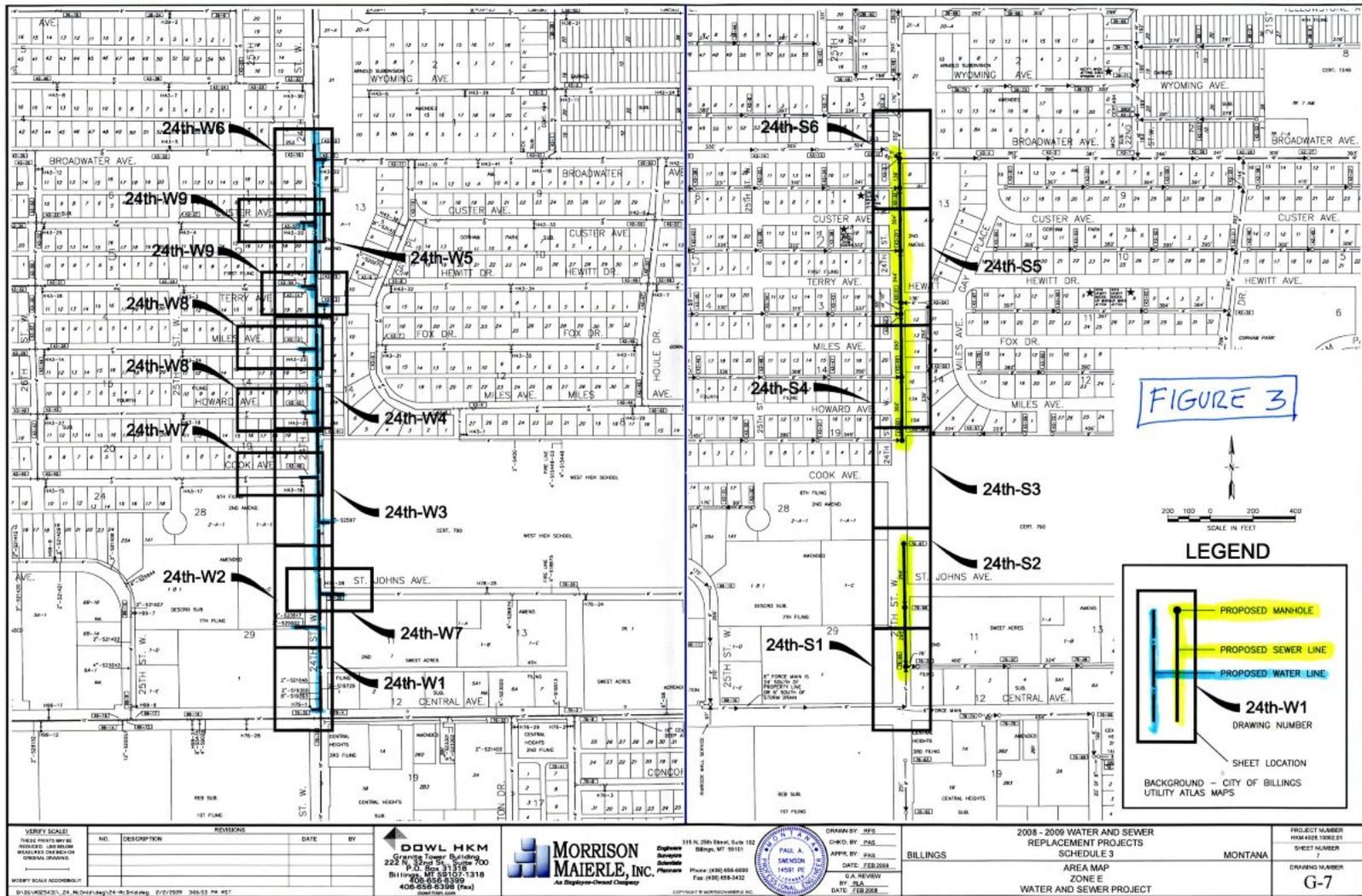
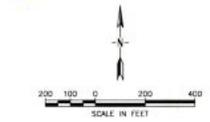


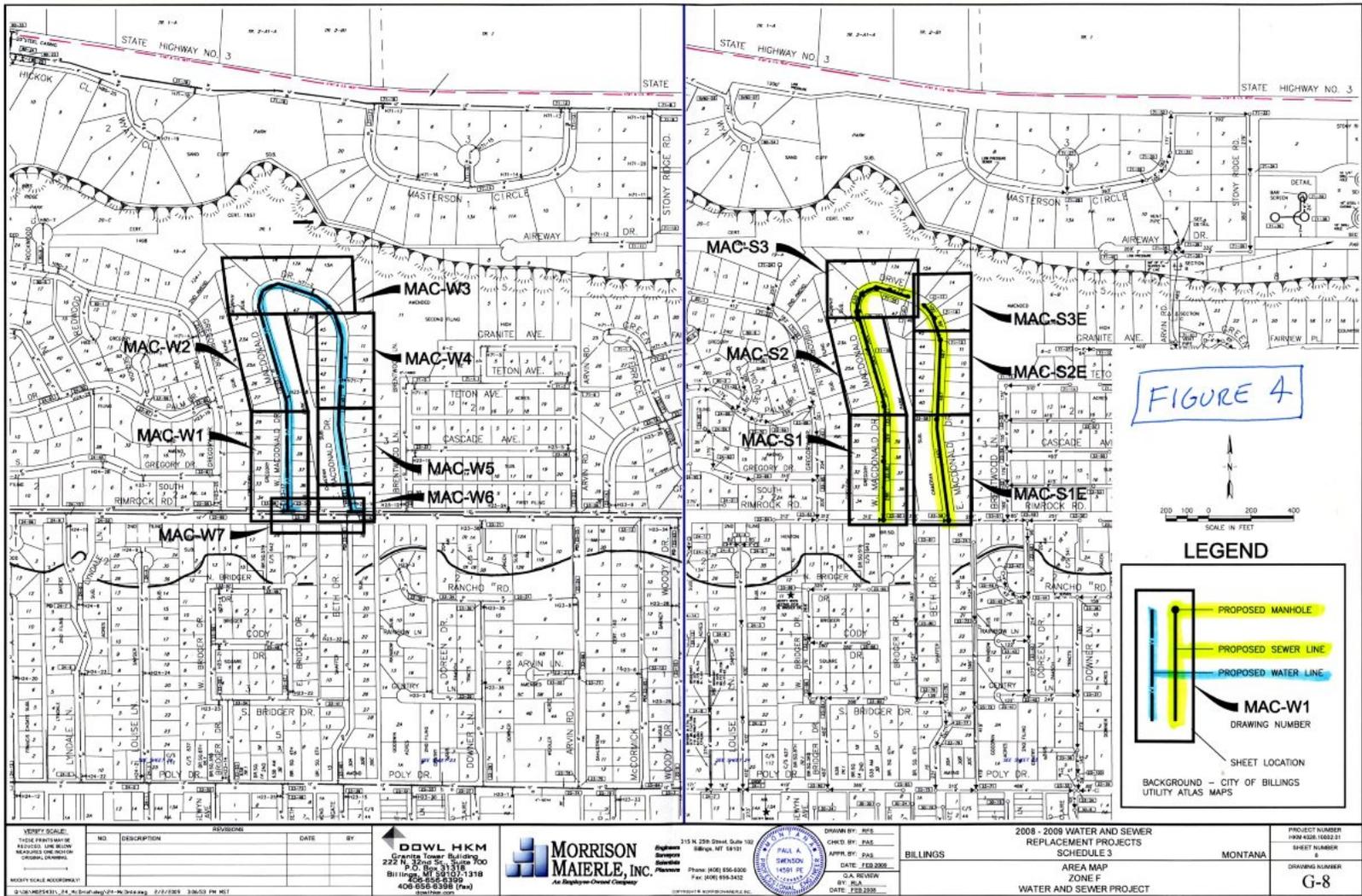
FIGURE 3



LEGEND

- PROPOSED MANHOLE
- PROPOSED SEWER LINE
- PROPOSED WATER LINE
- 24th-W1 DRAWING NUMBER
- SHEET LOCATION
- BACKGROUND - CITY OF BILLINGS UTILITY ATLAS MAPS

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2008 - 2009 WATER AND SEWER REPLACEMENT PROJECTS SCHEDULE 3 AREA MAP ZONE E WATER AND SEWER PROJECT					
PROJECT NUMBER: H&M 4028 15002 01 SHEET NUMBER: 7 DRAWING NUMBER: G-7					



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MOODY SCALE ADDRESS: 1/4" = 40' (Horizontal) 1/8" = 20' (Vertical) 2/11/09 3:36:53 PM HT

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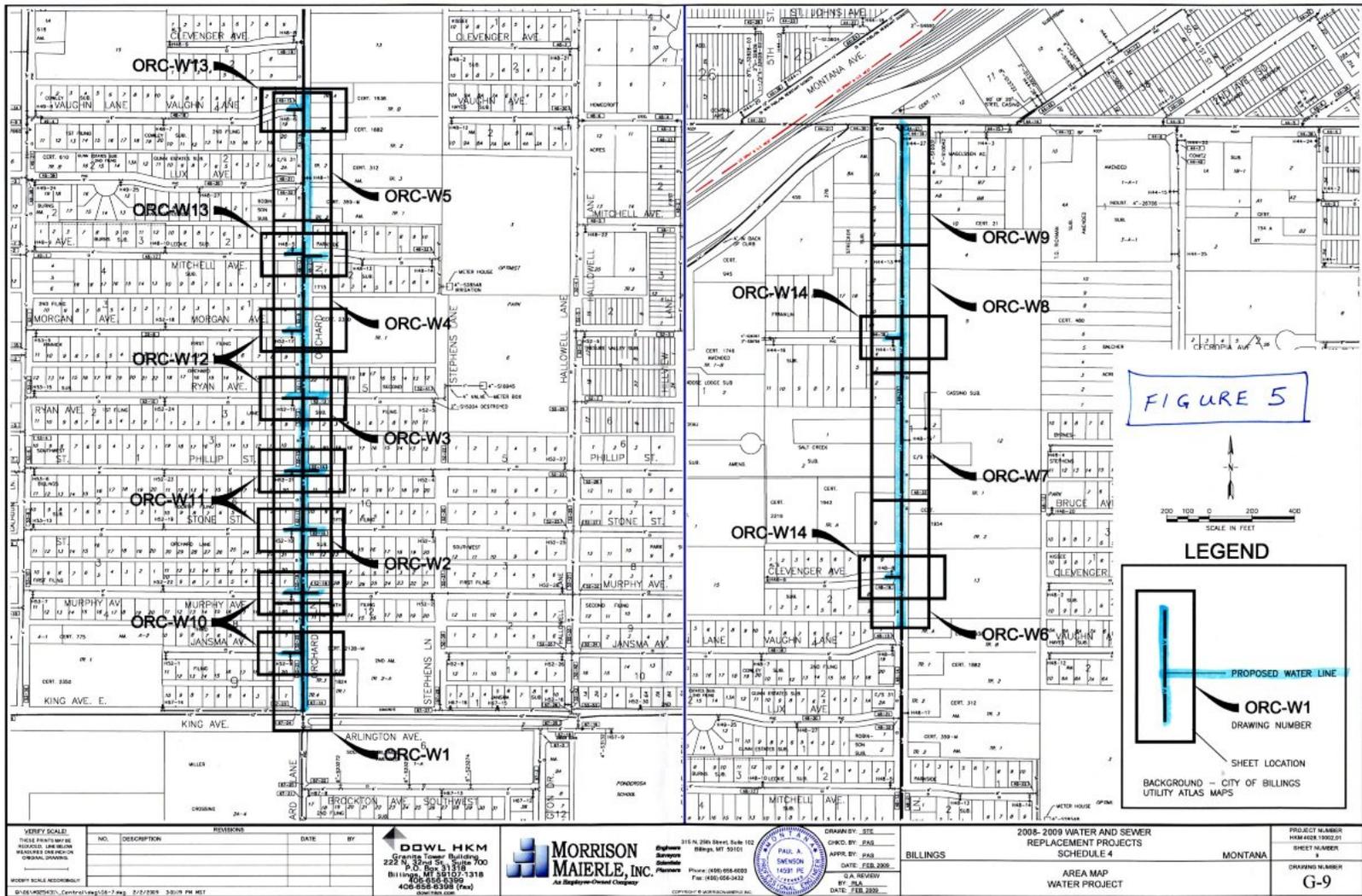
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DRAWN BY: RES
 CHD BY: PMS
 APPR BY: PMS
 DATE: FEB 2008
 QA REVIEWER:
 BY: RJA
 DATE: FEB 2008

2008 - 2009 WATER AND SEWER
 REPLACEMENT PROJECTS
 SCHEDULE 3
 AREA MAP
 ZONE F
 WATER AND SEWER PROJECT

PROJECT NUMBER
 1902 4328.10002 01
 SHEET NUMBER
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G-8



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CHKD. BY: ZAS
APPR. BY: ZAS
DATE: FEB. 2008
DATE: FEB. 2008

2008-2009 WATER AND SEWER
REPLACEMENT PROJECTS
SCHEDULE 4
AREA MAP
WATER PROJECT

PROJECT NUMBER:
HKM 4028.13002.01
SHEET NUMBER:
DRAWING NUMBER:
G-9

