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**IR 15-4(65)197, INTERSTATE 15
NORTH HELENA VALLEY INTERCHANGE
LEWIS AND CLARK COUNTY, MONTANA**

**ATTACHMENT TO THE
DRAFT ENVIRONMENTAL
IMPACT STATEMENT
(TO CONSTITUTE THE FINAL EIS)**

**MONTANA DEPARTMENT
OF TRANSPORTATION**

AND

**U.S. DEPARTMENT OF TRANSPORTATION
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Project IR 15-4(65)197, Interstate 15
North Helena Valley Interchange
Lewis and Clark County, Montana

Attachment to the
Draft Environmental Impact Statement
(To Constitute the Final Environmental Impact Statement)

Submitted pursuant to 42 U.S.C. 4332(2)(c) by the

U.S. Department of Transportation
Federal Highway Administration

and

Montana Department
of Transportation

3-4-92
Date of Approval

Gordon L. Larson
for Montana Department of Transportation

4-10-92
Date of Approval

James H. Lamb
for Federal Highway Administration

The following persons may be contacted for additional information concerning this document:

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Comments on this final EIS are due by 15 June 1992 and should be sent to Gordon L. Larson at the above address.

This attachment to the draft environmental impact statement has been prepared in accordance with 40 CFR 1503.4(c) of the CEQ Regulation which provides for the opportunity to expedite the final environmental impact statement preparation. This document includes: 1) errata sheets making necessary corrections to the draft EIS, 2) a section identifying the preferred alternative and a discussion of the reasons why it was selected, 3) a list of commitments for mitigation measures for the preferred alternative, 4) a summary of the location and design public hearing, 5) copies of written comments (and responses thereto) received as a result of circulation of the draft EIS, 6) an only practicable alternative wetlands finding. This document, combined with the draft EIS, shall constitute the final EIS.

A1. INTRODUCTION

This attachment to the Draft Environmental Impact Statement for the North Helena Valley Interchange, hereinafter referred to as the draft EIS, has been prepared in accordance with CEQ Regulation 40 CFR 1503.4(c) and Section VI.C. Abbreviated Version of Final EIS of FHWA Technical Advisory T 6640.8a, "Guidance for Preparing and Processing Environmental and Section 4(f) Documents", October 30, 1987.

Changes needed, as a result of comments received in response to circulation of the draft EIS and in response to the location and design public hearing, are minor.

This document, combined with the draft EIS, shall constitute the final EIS.

This document includes:

- Errata sheets making necessary corrections to the draft EIS,
- A section identifying the preferred alternative and a discussion of the reasons why it was selected,
- A list of commitments for mitigation measures for the preferred alternative,
- A summary of the location and design public hearing,
- Copies of written comments received as a result of circulation of the draft EIS and responses thereto, and
- An only practicable alternative finding for wetlands.

Only this attachment is being provided to parties who received a copy of the draft EIS. Those who may have already disposed of their copy of the draft EIS are encouraged to contact the following for a new copy of the document:

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Both the draft EIS and this attachment have been filed with the EPA under a single final EIS cover sheet.

A2. ERRATA SHEETS

The following corrections should be made to the draft EIS:

1. On Figure 2-1, replace "SIERRA ROAD INTERCHANGE" with "NORTH HELENA VALLEY INTERCHANGE".
2. In Section 7.6 WATER QUALITY, add the following sentence to the the first paragraph:

Alternative B, the preferred alternative, will have no impact on Ten Mile Creek.
3. Add the following to Section 7.3.4.2 Parks:

Since Alternative B is the preferred alternative and will have no impact on the park, no Section 6(f) evaluation will be required.
4. In Section 7.5 NOISE, on the table titled "NOISE LEVELS, NORTH HELENA VALLEY INTERCHANGE, Leq(h)dba", a noise level of 0 dba is indicated for the No-Build Alternative in the year 2013 at Site 8. This should be changed to 60 dba.

Add the following to the first paragraph on page 51 in Section 7.5 NOISE:

To approach the noise abatement criteria (NAC) means to increase to within 1 decibel of the stated NAC.

Replace the last paragraph of Section 7.5 NOISE with the following:

Projected noise levels will exceed existing noise levels by more than 10 dba at none of the monitoring sites. Projected noise levels will not exceed the NAC at any of the sites and will approach the NAC at only one site, if Alternative B is constructed -- at the residence which constitutes the West Mont Group Home southeast of the intersection of Montana Avenue and the proposed Forestvale Road extension. As discussed in Section 7.12. RELOCATIONS, this home will be relocated.

5. In Section 7.10, in the last sentence of the first paragraph, change Alternative A-2 to Alternative A-1.
6. In Section 7.10, the phrase reading "Cause an increase in traffic volumes past the property on Montana Avenue" should be changed to read "Cause an increase in traffic volumes past the property on Sierra Road"
7. In Section 7.10, the phrase reading "Provide quick convenient access to the property from I-15 and, as a result, may increase the number of visitors to the site" should be indented as are the several phrases above it. This phrase is intended to be a continuation of the discussion of the effects of Alternatives A-1 and A-2.
8. In Section 7.12. RELOCATION, replace the fourth paragraph (the last paragraph on Page 55) with the following:

A faint, grayscale background image of a classical building with four prominent columns and a pediment, likely a library or government building. The image is centered and serves as a backdrop for the text.

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Alternative B will require the relocation of the West Mont Group Home located south of the extended Forestvale Road near Montana Avenue. Residences of this home are considered handicapped and are in the care of the West Mont Habilitation Services, Inc.

Alternative B will also require the relocation of 3 to 4 mobile homes, depending on the current occupancy in the four mobile home sites in the Golden Acres Trailer Court. Residents of these mobile homes may be low income or elderly.

9. On page 68, change "9. COMMENTS AND COORDINATION" to "10. COMMENTS AND COORDINATION".

10. In Section 10. COMMENTS AND COORDINATION, add the following sentence to the sixth paragraph (referring to the second public meeting which was held on 23 July 1990):

Comments at the meeting and written comments received later were again mostly in favor of the construction of Alternative B over the other alternatives.

11. On page 70, change "10. INDEX" to "11. INDEX".

12. On page 74, change "11. APPENDICES - COMMENTS RECEIVED" to "12. APPENDICES - COMMENTS RECEIVED".

13. Add the following sections to Chapter 2. SUMMARY:

2.9 AREAS OF CONTROVERSY

Owners of one parcel along the proposed extension of Forestvale Road have indicated that it does not seem right that so much of their parcel would be taken for right-of-way, for the proposed Alternative B, as opposed to taking more from the existing gun club on the opposite side of the Forestvale extension. See the 06 May 1991 letter from Fred and Carol Lode in APPENDIX - COMMENTS RECEIVED in the attachment to the draft EIS.

As explained in the response to the letter, the proposed Alternative B has been located to, as much as possible, avoid wetland impacts and to avoid conflict with the safety zones for the gun club shooting pits and to avoid conflict with and relocation of existing homes and structures as much as possible. Approximately 1.0 acres of new right-of-way will be required from the gun club (the club's total ownership area is approximately 70 acres) and approximately 1.8 acres (the Lode's total ownership area is 4.7 acres) of new right-of-way will be required from Mr. and Mrs. Lode. No relocations of homes or businesses will be required on either property.

There are no other significant areas or issues of controversy that have been identified during the scoping and public hearing process or during the preparation of this document.

2.10 MAJOR UNRESOLVED ISSUES

There are no major unresolved issues with other agencies.

2.11 OTHER FEDERAL ACTIONS REQUIRED

A floodplain permit will be required.

Section 106 Clearance has been received.

A special use permit will be required from the Bureau of Reclamation for relocation of or revisions to irrigation facilities.

A Clean Water Act Section 404 Permit will be required as a result of impacts on wetlands.

A3. PREFERRED ALTERNATIVE

Based on the data collected, studies completed and public and agency comment received to-date, the preferred alternative is Alternative B, for the following reasons:

- As indicated in Section 4.2 of the draft EIS, one of the purposes of this project is to decrease future traffic volumes on the heavily traveled North Montana Avenue and, as a result, increase traffic volumes on the under-utilized Interstate 15. As indicated in Section 4.2 of the draft EIS, approximately 400 to 500 more vehicles per day will use I-15 with Alternative B than with Alternative A-1 or A-2.
- Alternative A-1 or A-2 will cause an increase in vehicle traffic volumes on Sierra Road near Rossiter School, increasing the related safety hazards. Alternative B should cause a decrease in traffic volumes in this area. See Section 4.2 of the draft EIS.
- No prime or unique farmland will be converted to highway right-of-way with Alternative B. See Section 7.2 of the draft EIS.
- Construction of Alternative A-1 or A-2 will require approximately 0.8 acres of land from Sierra Park. Alternative B will require no land from the park. See Section 7.3.4.2 of the draft EIS.
- Alternative B is preferred by the West Helena Valley Volunteer Fire Department because it will provide quicker access across and to Interstate 15. See Section 7.3.4.3 of the draft EIS.
- Alternative A-1 or A-2 will require a significant amount of construction in a designated floodplain area where flood elevations are critical due to the school and residences in the area. Construction of Alternative A-1 or A-2 will require substantial measures to prevent increasing flood elevations and effects of the project in this area will still be uncertain. Alternative B has a much less significant involvement on flood plains and will be constructed in an area with few existing structures and low flood damage potential. See Section 7.7 of the draft EIS.
- Alternative A-1 or A-2 will negatively impact the Little Red Schoolhouse, a property listed on the National Register of Historic Places. Alternative B will have no impact on this site. See Section 7.10 of the draft EIS.
- Since Alternative B will encourage the most drivers to use I-15, it is expected to have the most beneficial impact on air quality. See Section 7.13 of the draft EIS.
- Alternative A-2 will affect Interstate 15 traffic during construction. Reconstruction of the existing Interstate 15 bridges and reconstruction to increase the elevation of I-15 to match the bridges will require that each side of the 4-lane highway be closed to traffic for approximately one year while traffic is maintained on the other. See Section 7.16 of the draft EIS.
- The Helena Transportation Coordinating Committee (TCC) has expressed support for Alternative B as the preferred alternative.

A4. MITIGATION MEASURES

A4.1. LAND USE. No significant impacts have been identified.

A4.2. FARMLAND. Since the preferred alternative, Alternative B, will not require the conversion of any prime or unique farmland, no specific mitigation measures are proposed.

A4.3. SOCIAL AND ECONOMIC. Sanitary sewer drain fields disturbed by construction will be replaced in accordance with local and state regulations.

The West Mont Group Home, southeast of the intersection of Montana Avenue and Forestvale Road, will be relocated.

No other specific mitigation measures are proposed.

A4.4. PEDESTRIANS AND BICYCLISTS. A pedestrian walkway will be placed on the new structure to allow safe access across Interstate 15.

A4.5. NOISE. Noise impacts have been identified at only one site, near the location of the West Mont Group Home, if Alternative B is constructed. As indicated in Section A4.12. RELOCATIONS of this document, this facility will be relocated if Alternative B is constructed and will therefore not be impacted by noise.

In an effort to prevent future traffic noise impacts on currently undeveloped lands, information contained in this document is being furnished to local government and planning officials in the project area. These officials may consider land use restrictions or regulations that prevent further development of incompatible activities or require new structures and other facilities to be located and constructed to avoid future noise impacts. Consideration may also be given to requiring future developments, where noise impacts are expected, to provide noise barriers or other abatement measures.

A4.6. WATER QUALITY. The Bureau of Reclamation canal, which is located parallel with and adjacent to the east side of I-15 will be relocated. Specific formats and procedural requirements will be followed for right-of-way or easement revisions.

Requirements and recommendations of the Sediment and Erosion Control Ordinance of the Lewis and Clark County Conservation District will be adhered to during all phases of construction.

Relocation of the canal will take place during a time outside the irrigation season or in such a manner as to not affect the flow, distribution and quality of irrigation water.

Any potential short term construction related impacts will be mitigated by conformance to the Montana Department of Transportation Standard Specifications and adherence to requirements of the Water Quality Bureau of the Montana Department of Health and Environmental Sciences and local regulations.

A4.7. FLOODPLAINS. With the preferred alternative, Alternative B, pipe culverts will be placed under Forestvale Road that are of the appropriate size to pass the 100 year flood flows without increasing flood levels above existing levels. Improved inlet and outlet channel sections may also be required to direct flow to and from the culverts. Existing channels in this area are limited to shallow swales and require the use of low dikes and improved channels to direct the flow to and from the culverts.

A4.8. WETLANDS. The following measures will be employed to mitigate the loss of wetlands:

- The proposed interchange design will be shifted approximately 60 feet to the south to reduce the area of wetlands affected. This is as far south as the interchange can be moved while still maintaining safety standards and avoiding impacts on Ten-Mile Creek. This shift will reduce the area of wetland affected from the 4.40 acres mentioned in the draft EIS to approximately 3.6 acres.
- Enhancement features will be constructed in the northeast corner of the existing wetland in the area shown on Figure 5-1. This area currently contains poor soils and only an intermittent water supply so it is currently almost void of vegetation and of minimal wildlife value. Enhancement will include excavation of several small ponds for waterfowl and aquatic vertebrates for nesting and feeding sites, importing topsoil from excavated areas of the interchange project and planting of adaptable tree and shrub species such as narrow-leaf cottonwood and willow.

The proposed project has been coordinated with the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Montana Department of Fish, Wildlife and Parks and with the Montana Inter-Agency Wetlands Group. Members of the Inter-Agency Wetlands Group have generally agreed that the above measures will effectively mitigate the potential wetland losses and will result in no net loss of wetland quality or quantity in the area¹.

An additional beneficial impact of the proposed project if Alternative B is constructed may include additional borrow sites that will be required in the area and that may be reclaimed to provide wetland areas. One such area exists southeast of and adjacent to the existing wetland area as shown of Figure 5-1.

The landowner of the existing wetland area and potential adjacent gravel pit/wetland expansion areas, Mr. Robert Ellis, has expressed interest in and approval for these concepts.

A mitigation measure that has been considered but is not recommended includes the following:

- Instead of rerouting and reconstructing the existing irrigation main around the proposed interchange, the canal could be placed in a pipe culvert and go under the interchange ramps as recommended by the Bureau of Reclamation¹. Costs and reduction in wetland impacts are summarized as follows:

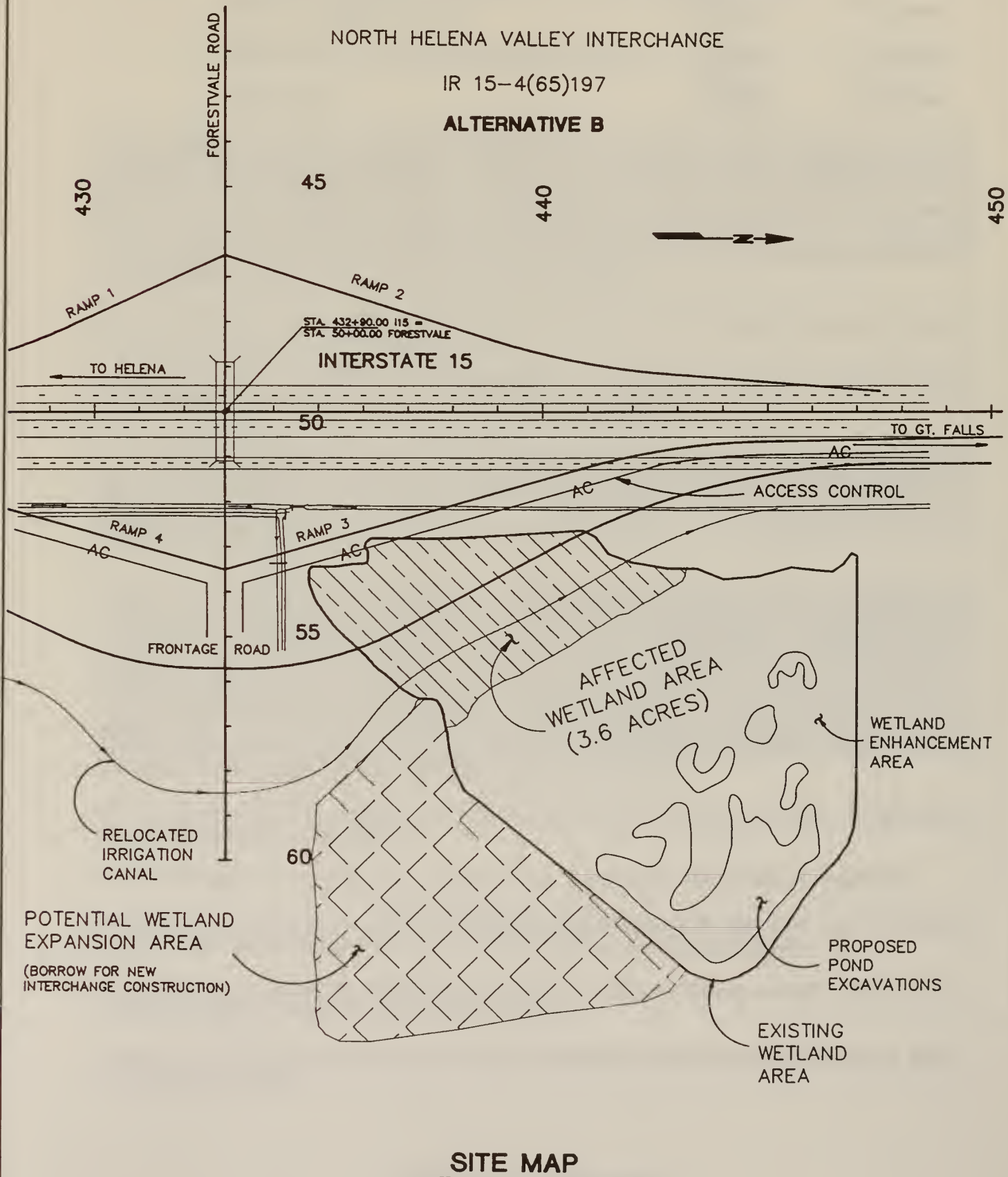
1. Chaffee, George, Resource Consultant, Report on Mitigation Field Meeting Held on 26 June 1991. Memo dated 27 June 1991.

WETLAND MITIGATION PLAN FOR THE PREFERRED ALTERNATIVE

NORTH HELENA VALLEY INTERCHANGE

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ALTERNATIVE B



SITE MAP

FIGURE 5-1

S:\FORMAP.DWG 2-28-92

<u>Option</u>	<u>Cost</u>	<u>Wetland Affected</u>
Reroute Irrigation Canal	\$190,000	3.6 Acres
Place Irrigation Canal in 42" Concrete Pipe	\$260,000	2.3 Acres
Differences	----- \$70,000	----- 1.3 Acres

This mitigation measure is not recommended because of the relatively high cost (approximately \$70,000) compared with the relatively small amount of impacted wetland area that would be avoided (approximately 1.3 acres). The construction of the pipe culvert would also require the construction of an irrigation diversion structure within the Interstate 15 right-of-way and controlled access area (between Ramp 3 and Interstate 15). This would create a safety hazard due to personnel and equipment entering a controlled access area for operation and maintenance of the diversion structure.

A4.9. THREATENED OR ENDANGERED SPECIES. No impacts that may result from the preferred alternative have been identified.

A4.10. HISTORICAL AND ARCHAEOLOGICAL PRESERVATION. No impacts that may result from the preferred alternative have been identified.

A4.11. VISUAL. Visual impacts will be mitigated by construction of uniform and smooth fill slopes rounded and shaped to, as much as possible, blend with the existing landscape. All slopes will be seeded with native grasses and other plants. The Montana Department of Transportation practice of mowing adjacent to the highway and controlling noxious weeds will also be a mitigating factor.

A4.12. RELOCATION. The West Mont Group Home located at the corner of Montana Avenue and Forestvale Road and up to 4 mobile homes will be relocated as required by the construction of the Forestvale Road extension to the new interchange. Relocations will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The Montana Department of Transportation has a relocation assistance program whereby supplemental housing payments, moving costs, advisory assistance and other services are offered to individuals displaced by the highway construction project. The payments for relocation are offered in addition to the amount of just compensation for the right-of-way requirements.

A4.13. AIR QUALITY. No significant negative impacts that may result from the preferred alternative have been identified.

A4.14. PERMITS. The following permits will be required for the preferred alternative:

Asphalt plants and gravel crushers will require an Air Quality Permit from the Air Quality Bureau of the Montana Department of Health and Environmental Sciences.

A floodplain permit will be required from Lewis and Clark County and the Montana Department of Natural Resources and Conservation.

Section 106 Clearance was received from the Montana State Historic Preservation Office on 25 February 1991.

Where a roadway crosses a Bureau of Reclamation water carriage facility, a Special Use Permit must be acquired².

A Clean Water Act Section 404 Permit will be acquired as a result of the impact on wetlands as described in Section 5.8.

A4.15. ENERGY. No significant impacts that may result from the preferred alternative have been identified.

A4.16. CONSTRUCTION. Construction impacts will be mitigated to the extent practical through proper construction practices. Dust will be controlled by watering or other acceptable methods. Construction related erosion will be controlled and slopes will be revegetated as soon as possible.

Gravel and borrow sources for base and surfacing aggregates have not yet been identified. Borrow material removal and gravel pits will be subject to applicable rules and regulations of the Montana Open Cut Mining Act. A mine reclamation plan will be required.

A traffic control plan will be developed to minimize inconvenience to motorists during construction. Construction of the bridge crossroad will occur over the Interstate Highway while traffic is maintained. Construction of the extension of Forestvale Road will occur in an area where no public roadways currently exist -- access to the gun club and to several residences in the area will be maintained at all times during construction.

A4.17. COMMITMENTS OF RESOURCES. No significant impacts that may result from the preferred alternative have been identified.

2. J. (Jim) L. Wedeward, Project Manager, Montana Projects Office, Great Plains Region, Bureau of Reclamation, U.S. Department of the Interior. Letter dated 01 November 1989.

A5. COMMENTS RECEIVED

Since completion and distribution of the draft EIS, a location and design hearing has been held. A summary of the meeting is included in the Appendix.

Written comments received in response to the circulation of the draft EIS and the location and design public hearing are also included in the Appendix. Where appropriate, responses to the comments are included.

A6. FINAL EIS CIRCULATION LIST

The following list identifies entities receiving copies of this document.

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Sierra Club
Billings - Yellowstone Basin Group
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Billings, MT 59102

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6150 North Montana
Helena, MT 59601

Greg E. Martin
1276 Sierra Road East
Helena, MT 59601

Martin's IGA Market
6025 North Montana Avenue
Helena, MT 59601

Dan McGowan
City of Helena Trans. Director
316 North Park
Helena, MT 59624

Bob McInerney
750 Maynard Road
Helena, MT 59601

Leo B. Meyer
5910 North Montana Avenue

Helena, MT 59601

David Monsen
New Life Lutheran Church
5980 North Montana
Helena, MT 59601

Tim & Colleen Morgan
2120 Sierra Road East
Helena, MT 59601

David R. Munger
71-884 Magnesia Falls
Rancho Mirage, CA 92270

Jack Neiman
1265 Sierra Road East
Helena, MT 59601

New Life Lutheran Church
5980 North Montana Avenue
Helena, MT 59601

Evelyn Newberg
6080 Goodwin Drive
Helena, MT 59601

Laverne Newberg
6080 Goodwin Drive
Helena, MT 59601

David F. Pepin
1090 Vallejo Road
Helena, MT 59601

Doug & Floy Peterson
Little Red School House
1635 Sierra Road East
Helena, MT 59601
Leon & Gene Peterson
1316 Sierra Road East
Helena, MT 59601

Charles Pierce
5609 Alabama Drive
Helena, MT 59601

Bob Race
1612 Sierra Road East
Helena, MT 59601

Robert Rasmussen
(see County Planning)

Senator Tom Rasmussen
550 North Montana
Helena, MT 59601

William Rauch
1672 Sierra Road East
Helena, MT 59601

Jim Rice
1525 Williamsburg Road
Helena, MT 59601
Roman Catholic Bishop of Helena
P.O. Box 1729
Helena, MT 59601

Myrl Rose
5320 North Montana
Helena, MT 59601

F.C. Rude
1035 Sun Valley Road
Helena, MT 59601

Michael L. Schoebel
1280 Sierra Road East
Helena, MT 59601

Thomas R. & Karen M. Schuster
1515 Easy Road
Helena, MT 59601

Karen Sexton
8220 Douglas Creek
Helena, MT 59601

Donald & Rosali Shoquist
1685 Sierra Road East
Helena, MT 59601

Jerry & Katie Sorenson
3815 Kiki Drive
Helena, MT 59601

Donald R. Spaulding
6133 Goodwin Drive
Helena, MT 59601

Bill Squires
3840 Kismet Drive
Helena, MT 59604

Louise Stoner
1350 Ponderosa Road
Helena, MT 59601

Sheldon Stoner
6330 Blackfoot Drive
Helena, MT 59601

Edward A. Swetish
6130 Center Drive
Helena, MT 59601

Donald A. Talseth
6090 North Montana Avenue
Helena, MT 59601

Joseph A. Terrio, Jr.
6073 Goodwin Drive
Helena, MT 59601

Mrs. Anne M. Tomlinson
6122 Center Drive
Helena, MT 59601

Mignon Waterman
530 Hazelgreen
Helena, MT 59601

West Valley Fire Department
Attn: Chief Tom Leonard
775 Middlemas Road
Helena, MT 59601

WestMont
Attn: Tim Plaska
2525 colonial Drive
Helena, MT 59601

James Widerholt
1322 Sierra Road East
Helena, MT 59601

Chuck Wirth
1355 Mill Road
Helena, MT 59601

Blake Wordal
(see County Commission)

Delores E. Wuerl
6130 Goodwin Drive
Helena, MT 59601

ONLY PRACTICABLE ALTERNATIVE
WETLANDS FINDING

for

IR 15-4(65)197, INTERSTATE 15
NORTH HELENA VALLEY INTERCHANGE
LEWIS AND CLARK COUNTY, MONTANA

14 November 1991

- 1) This FINDING provides documentation that this proposed project will minimize the destruction, loss or degradation of wetlands. This FINDING also documents the steps to preserve and enhance the natural and beneficial values of the wetlands affected by this proposed project. This proposed project's impacts to wetlands will be in compliance with Executive Order 11990.
- 2) It has been determined that there are no practicable alternatives to this proposed project. This FINDING is included with an environmental document in which an alternatives analysis has been performed. The alternatives evaluated are included as part of an environmental impact statement.
- 3) This proposed project has been determined to include all practicable measures to minimize harm to wetlands. This determination has been made through the mitigation process described in following paragraphs.
- 4) Based upon the above considerations, it is determined that there is no practicable alternative to the proposed new construction in wetlands and that the proposed project includes all practicable measures to minimize harm to wetlands which may result from such use.

MITIGATION PROCESS

The proposed project has been coordinated with the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Montana Department of Fish, Wildlife and Parks and with the Montana Inter-Agency Wetlands Group . Members of the Inter-Agency Wetlands Group have generally agreed that the following measures will effectively mitigate the potential wetland losses and will result in no net loss of wetland quality or quantity in the area¹.

The following measures will be employed to mitigate the loss of wetlands:

- The proposed interchange design will be shifted approximately 60 feet to the south to reduce the area of wetlands affected. This is as far south as the interchange can be moved while still maintaining safety standards and avoiding impacts on Ten-Mile

1. Chaffee, George, Resource Consultant, Report on Mitigation Field Meeting Held on 26 June 1991. Memo dated 27 June 1991.

Creek. This shift will reduce the area of wetland affected from the 4.40 acres mentioned in the draft EIS to approximately 3.6 acres.

- Enhancement features will be constructed in the northeast corner of the existing wetland in the area shown on Figure 5-1. This area currently contains poor soils and only an intermittent water supply so it is currently almost void of vegetation and of minimal wildlife value. Enhancement will include excavation of several small ponds for waterfowl and aquatic vertebrates for nesting and feeding sites, importing topsoil from excavated areas of the interchange project and planting of adaptable tree and shrub species such as narrow-leaf cottonwood and willow.

An additional beneficial impact of the proposed project if Alternative B is constructed may include additional borrow sites that will be required in the area and that may be reclaimed to provide wetland areas. One such area exists southeast of and adjacent to the existing wetland area as shown of Figure 5-1 on the following page.

The landowner of the existing wetland area and potential adjacent gravel pit/wetland expansion areas, Mr. Robert Ellis, has expressed interest in and tentative agreement with these concepts.

A mitigation measure that has been considered but is not recommended includes the following:

- Instead of rerouting and reconstructing the existing irrigation main around the proposed interchange, the canal could be placed in a pipe culvert and go under the interchange ramps as recommended by the Bureau of Reclamation². Costs and reduction in wetland impacts are summarized as follows:

Option	Cost	Wetland Affected
Reroute Irrigation Main	\$190,000	3.6 Acres
Place Irrigation Main in 42" Concrete Pipe	\$260,000	2.3 Acres
Differences	----- \$70,000	----- 1.3 Acres

This mitigation measure is not recommended because of the relatively high cost (approximately \$70,000) compared with the relatively small amount of impacted wetland area that would be avoided (approximately 1.3 acres). The construction of the pipe culvert would also require the construction of an irrigation diversion structure within the Interstate 15 right-of-way and controlled access area (between Ramp 3 and Interstate 15). This would create a safety hazard due to personnel and equipment entering a controlled access area for operation and maintenance of the diversion structure.

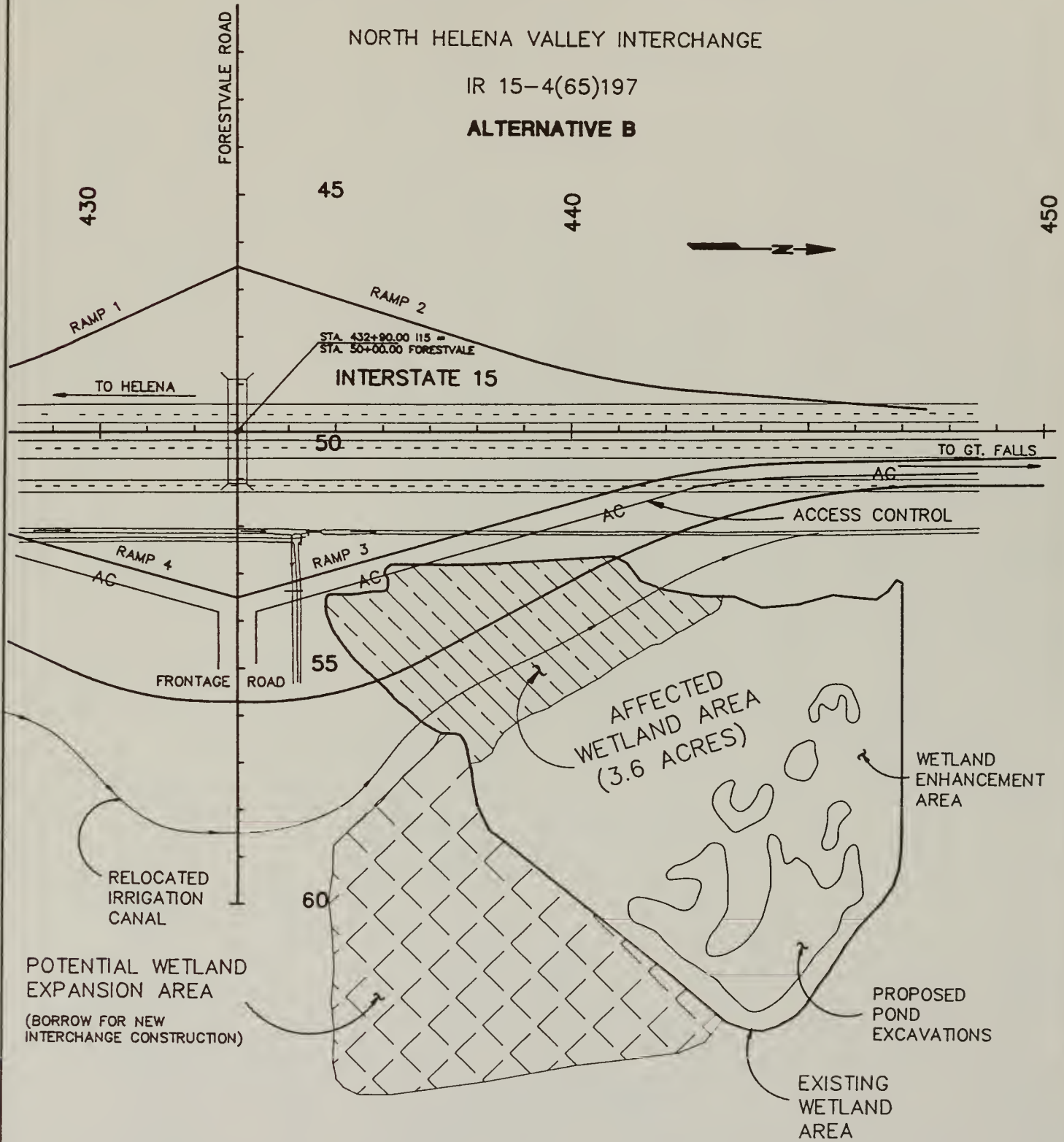
2. Chaffee, George, Resource Consultant, Report on Mitigation Field Meeting Held on 26 June 1991. Memo dated 27 June 1991.

WETLAND MITIGATION PLAN FOR THE PREFERRED ALTERNATIVE

NORTH HELENA VALLEY INTERCHANGE

IR 15-4(65)197

ALTERNATIVE B



SITE MAP

FIGURE 5-1

S:\FORSMAP.DWG 2-28-92

APPENDIX - COMMENTS RECEIVED

RECEIVED

JUL 8 1991

MORRISON - MAIERLE/CSSA, INC.

SUMMARY OF THE
LOCATION AND DESIGN PUBLIC HEARING

FILE #427

IR 15-4(65)
North Valley Interchange
Helena (Sierra Road)

This report is submitted in lieu of a verbatim transcript of the proceedings at the Location and Design Public Hearing held in the Rossiter School Gymnasium, April 18, 1991. The tape of the hearing is on file with the Department of Transportation's Public Hearings office in Helena. Thirty-six people attended the meeting. A statement was also distributed explaining that the Highway Commission will place this project on hold pending the result of the changes in the Federal Funding Bill.

Brad Peterson, Project Manager with Morrison-Maierle/CSSA Inc., explained the purpose of the project to shift some traffic from Montana Avenue to the interstate. He outlined the several alternates that have been studied. The first, at the Sierra Road separation, has two options to add four ramps forming a diamond configuration. A-1 spreads the ramps away from the interstate about 300 feet from I-15 centerline to the ramp termini. A-2 places the ramps very close to the interstate lanes, but would require reconstruction of the bridges over Sierra to provide proper sight distances at the ramp junctions with Sierra. Alternate B is the new location which would extend Forestvale Road east to the interstate with a structure over I-15 and the property spaced on-off ramps. Both locations would require aligning the frontage road to the east and some of the irrigation canal. The costs of each "Build" alternate were summarized as A-1 at \$2.1 million, A-2 at \$3.6 million, and Alternate B at \$2.8 million, with Alternate B designated as preferred.

Other build alternates considered, but dropped as either not viable or not adequately addressing the problem, were a 1/2 diamond for access to and from Helena only, move Alternate B north to the Gun Club shooting area and other east-west streets south of Forestvale. The "no-build" or leaving the condition as is continues as a consideration.

Brad summarized other items examined in the Environmental Impact Statement, such as wetlands, floodplain traffic changes, recreation and historic sites, prime and unique farmlands, and the like. These items will be replaced or otherwise compensated for through design and approval with governing agencies or the regulatory landowner agreements.

Joe Michelletti, Field Right-of-Way (R/W) Supervisor, explained the basic R/W steps to review approved R/W plans with all owners having interest in the land needed for the project, appraise the value of these interests, then draw up the agreements with these owners in exchange of compensation and services for the necessary land. Joe located the buildings which would be involved in the new R/W and explained the additional benefits under the relocating program of cash and services available to owners for making the moves. The controlled access boundaries were traced as being parallel to the ramps and crossing the access road (Forestvale) 300 feet from the ramp termini.

Fourteen people spoke at the meeting. The following is questions and discussion from the audience.

A Legislator questioned the procedure to keep the project moving and to determine an alternate. Bob Newhouse, Consultant Design Engineer, and Dan Bartsch, Information Officer, outlined the steps to request approval from the Federal Highway Administration and the Highway Commission. At this point, once the E.I.S. is complete and the alternate chosen, this project would be on hold pending the outcome of the Federal Highway Money Bill. The Legislator, County Commissioner and Helena Chamber of Commerce delegation committed to push for release of this project from the hold order.

Other questions related to projects in the area that addressed the valley traffic problems. Dan and Ray Grant, Engineering Services - Butte District, explained the projects to revise the off ramp at Prospect with signals and three lanes, overlaying Montana Avenue and new material for the railroad crossing. One responded that these two repairs would not address the traffic movement problems.

Brad Peterson explained the expected traffic pattern and use of the interchange. He reviewed the design to provide adequate pipes for water runoff as the 1981 flood waters were discussed. Brad also explained that although warrants are not expected to be met to justify traffic signals on Montana on this project, conduit will be installed to allow easy installation when they are needed. He also advised that studies did indicate turn lanes would be justified.

A County Commissioner acknowledged that the expected county share of \$166,000.00 was higher than an early estimate which was based on the design at Sierra Road. The county is adding to a fund but will be needing funds from other sources if the project is let in the next couple of years.

A member of Gun Club was concerned that the two east side shooting stations would be affected, which would disqualify the club from holding sanctioned matches. During discussion after the meeting, this was resolved as the new ramp is not as close as he thought. Another person along Forestvale expected his house and six other families will be affected and therefore opposed Alternate B.

Other opinions at the hearing stated two opposed to any interchange, two supported B with some revisions and five strongly supported Alternate B. Input received after the hearing included one phone call, five comment sheets and five letters. Seven supported Alternate B, two supported the project without preference and two did not oppose Alternate B but had reservations about the design and location.

The formal meeting closed at 8:50 p.m.

Daniel P. Bartsch
Daniel P. Bartsch, Information Officer
Public Affairs Bureau

DPB:Q:PAF:6.cm

Kathy (C)

DEPARTMENT OF HIGHWAYS



STAN STEPHENS, GOVERNOR 2701 PROSPECT AVE.
STATE OF MONTANA
HELENA, MONTANA 59620

February 15, 1991

FEB 19 1991

Marcella Sherfy
State Historic Preservation Officer
Montana Historical Society
225 North Roberts
Helena, MT 59620

Subject: IR 15-4(65)197
Sierra Road Interchange
C# 1234

The Montana Department of Highways has tentatively selected Forestvale Road (Alternate B) as the preferred location of a new interchange in the Helena Valley. We are requesting your concurrence that no prehistoric or historic sites were identified within the impact area of the alternate.

If you have any questions, please contact Jon Axline at 444-6258.

Edie Vinson

Edrie L. Vinson, Supervisor
Environmental Section

ELV:JA:D:ENV:J54.cm

- cc: D. S. Johnson
- C. S. peil
- R. R. Newhouse
- X-G. Rapp
- E. L. Vinson
- File

CONCUR
NO PROPERTIES ON OR ELIGIBLE
FOR-NRHP APPEAR LIKELY TO
EXIST WITHIN PROJECT IMPACT AREA
MONTANA SHPO
OUTREACH SIGNED *[Signature]*

Montana Department
of
Fish, Wildlife & Parks



1420 East Sixth Avenue
Helena, MT 59620
December 19, 1990

Edrie L. Vinson, Supervisor
Environmental Section
Dept. of Highways
2701 Prospect Ave.
Helena, MT 59620

Dear Edrie:

We have reviewed the North Helena Valley Interchange and the Columbia Heights - Hungary Horse wetland inventories. Both documents look complete and are satisfactory. The Columbia Heights write-up is fairly generic and we assume that this is because no centerline has been selected for this particular project. There was very little mention made by the consultant on any mitigation options other than an opportunity to create some replacement habitat in association with a fishing access site. This will obviously require some additional efforts once a centerline has been designated and acreages quantified.

Sincerely,

Jeff Herbert

Jeff Herbert
Statewide Waterfowl Coordinator
Wildlife Division

dl
1219.5a

RECEIVED

FEB 11 1991

MORRISON--MAIERLE/CSSA, INC.



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
215 NORTH 17TH STREET
OMAHA, NEBRASKA 68102-4978

April 8, 1991



REPLY TO
ATTENTION OF

Planning Division

Mr. David S. Johnson
Preconstruction Bureau
Montana Department of Highways
2701 Prospect Avenue
Helena, Montana 59620

Dear Mr. Johnson:

The Draft Environmental Impact Statement (DEIS) for the North Helena Valley Interchange has been reviewed.

One of our particular responsibilities in reviewing this DEIS is ensuring that it adequately addresses Section 404 permitting requirements. It is therefore necessary that a mitigation plan to offset losses to wetlands be formulated in order to comply with Section 404(b)(1) guidelines. The EIS should contain enough information to prepare a 404(b)(1) evaluation (40 C.F.R. 230). The EIS shall include discussion of means to mitigate adverse environmental impacts (40 C.F.R. 1502.16(h))

If you will be claiming an exemption under Section 404(r) of the Clean Water Act (CWA), then this DEIS needs to include:

- a. The requisite information on proposed discharges.
- b. Whether the proposal is consistent with the guidelines developed by EPA in conjunction with the Corps of Engineers (Corps) under subsection 404(b)(1) of the CWA. Please refer to the enclosed CEQ memorandum for guidance.

Sincerely,

Date Recd.	Preconst	4/15/91
Info	Act	Attach
MAIL ROUTE	initial	
30 Preconst Engr		
30 Assistant		
40 Office Mgr		
52 Road Design		
33 Environment		
34 Hydraulics		
35 Survey & Mapping		
36 Traffic		
39 Consultant		

Edward E. Mick

Gerard E. Mick
Chief, Environmental
Analysis Branch
Planning Division

Enclosure

Copies Mike, April 11, 1991

RECEIVED

APR 17 1991

MORRISON—MAIERLE/CSSA, INC.

A mitigation plan has been developed and is included in the Attachment to the Draft EIS.

Memorandum



U.S. Department of
Transportation
Office of the Secretary
of Transportation

Subject: Draft Environmental Impact Statement
Montana, IR 15-4(65)197,
North Helena Valley Interchange
Lewis and Clark County
FHWA-MT-EIS-91-01-D

Date: APR 18 1991

Reply to
Att'n of

From: Eugene L. Lehr
Chief, Environmental Division

To: Chief, Project Development Branch
Washington, D.C. 20590

We appreciate the opportunity to review the subject draft environmental impact statement. We have no comments.

Time Received	11/30/91	Initial	
Attach			
FILE NO.			
ROUTE			
PROJECT			
DATE			
BY			
NO.			
BY			
NO.			

NORTH HELENA VALLEY INTERCHANGE
 IR 15-4(65)197, INTERSTATE 15
 LOCATION AND DESIGN PUBLIC HEARING
 18 APRIL 1991, 7:30 P.M.

Please write your comments below concerning the proposed action. Comments may be left at the meeting or this form can be mailed to:

David S. Johnson
 Preconstruction Engineer
 Montana Department of Highways
 2701 Prospect Avenue
 Helena, MT 59620

We would appreciate receiving your comments by 07 May 1991.

Comments: I have attended all of the meetings so far and have written letters stating my concerns. However, for the record I still believe the construction of them would involve the best amount of time and property. It should be easier to work out an agreeable solution with the game club than to deal with Peoria School or all the people living near or on Peoria Rd. Myself included, as I own 5 acres on Peoria Drive, directly off Peoria Rd. Thank you again for the opportunity to express my views.

Please indicate your name, address, and affiliation (if any) below. Thank you for your interest in this project.

NAME & ADDRESS: Michaela St. John
6175 Peoria Dr.
Helena, Mt. 59601

RECEIVED

JUL 7 1991

MORRISON - MAIERLE/CSSA, INC.

NORTH HELENA VALLEY INTERCHANGE
IR 15-4(65)197, INTERSTATE 15

LOCATION AND DESIGN PUBLIC HEARING
18 APRIL 1991, 7:30 P.M.

Please write your comments below concerning the proposed action. Comments may be mailed to:

David S. Johnson
Preconstruction Engineer
Montana Department of Highways
2701 Prospect Avenue
Helena, MT 59620

We would appreciate receiving your comments by 07 May 1991.

Comments: *We are not opposed to the interchange being built using an extension of Forestvale Road however we are extremely concerned that the compensation we receive for our group home property at 5495 N. Montana may not be paid to replace the home. Our understanding is that either group home could be this one can only be replaced with new home constructed to be handicapped accessible in accordance with various state of standards. Two group homes we built this year have cost approximately \$234,000 and \$215,000. Inflationary increases will raise these costs next year and we may not receive enough compensation through the appraisal process and the Relocation Assistance Program to replace the home on North Montana. Please indicate your name, address, and affiliation (if any) below. Thank you for your interest in this project.*

NAME & ADDRESS: TIM PLASKA, DIRECTOR
WEST HOOT HABITATION SERVICES, INC.
2525 COLONIAL DRIVE HELENA MT. 59601

Date Recd.	Preconst.	5/19/91
Act	Info	MAIL ROUTE
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	30 Preconst Engr
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	30 Assistant
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	30 Office Mgr
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	22 Road Design
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	33 Environment
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	34 Hydraulics
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3a Survey & Mapping
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3a Traffic
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	35 Consultant
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Comments may be left
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	in envelope
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	at time of
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	meeting
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Thank
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	File

Relocation of the group home will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The Montana Department of Transportation has a relocation assistance program whereby supplemental housing payments, moving costs, advisory assistance and other services are offered to individuals displaced by the highway construction project. Costs mentioned in this letter will be reimbursed to the extent allowed by this program and as determined during the appraisal and negotiation processes.

Date Recd. Preconst. 5/2/91

MAIL ROUTE	Initial
30 Preconst Engr	
30 Assistant	
30 Office Mgr	
22 Road Design	
33 Environment	
34 Hydraulics	
35 Survey & Mapping	
36 Traffic	
37 Consultant	
Comments may be left	
File	

NORTH HELENA VALLEY INTERCHANGE
 IR 15-4(65)197, INTERSTATE 15
 LOCATION AND DESIGN PUBLIC HEARING
 18 APRIL 1991, 7:30 P.M.

Please write your comments below concerning the proposed action
 at the meeting or this form can be mailed to:

David S. Johnson
 Preconstruction Engineer
 Montana Department of Highways
 2701 Prospect Avenue
 Helena, MT 59620

We would appreciate receiving your comments by 07 May 1991.

Comments:

We very much favor the construction of an interchange in the North Helena Valley (I-15). We cast our preference for Alternative B (Forestvale Road) but if that proves to be not feasible we would welcome whatever location you deem to be most favorable in that vicinity.

Considering the number of people affected by Montana Avenue traffic, we feel this project should be considered "very high priority."

Thank you for giving us an opportunity to comment.

Please indicate your name, address, and affiliation (if any) below. Thank you for your interest in this project.

NAME & ADDRESS:

Walter Nelson
 Walter & Isabel Nelson
 1012 Middlemas Road
 Helena, Montana 59601

LEWIS AND CLARK COUNTY

Planning Department

City-County Building 316 North Park P.O. Box 1725 Helena, Montana 59623

Date Recd.	Preconst.	Attach
10/23	MAIL ROUTE	
	Phone 408/447-8374	
	30 Preconst Effort	
	31 Assistant	
	32 Office Mgr	
	33 Road Design	
	34 Environment	
	35 Highway	
	36 Survey & Mapping	
	37 Traffic	
	38 Consultant	
	File	

DATE: April 19, 1991
 FILE: 1511-15intr.com

David S. Johnson
 Preconstruction Bureau
 Montana Department of Highways
 2701 Prospect Avenue
 Helena, Montana 59620

Subject: Comments on the North Helena Valley Interchange, IR 15-4 (65) 197

Dear Mr. Johnson:

Having read the draft environmental impact statement on the North Valley Interchange project and attended the highway location and design public hearing held on April 16, 1991, I would like to make the following comments regarding the project.

As expressed earlier, Lewis and Clark County has taken a position of support for the Preferred Alternative (Alternative B). The location of this alternative seems to provide for better utility of Interstate 15, allow for improved provision of local services (due to the eastward extension of Forestvale Road), and create fewer impacts to the social and physical environments, than any of the alternatives considered.

A few modifications to the proposed design for Alternative B could further reduce some of the adverse effects identified. It appears that moving the interchange southward would reduce the effects on the identified wetland area in the northeast quadrant. In addition, this southward movement would reduce the potential for impacts to the Helena Gun Club property, particularly with regard to safety zones. Such minor relocation would require a curvilinear section in the Forestvale Road extension, but should not create any hazardous situations. It is understood that a southward relocation cannot be too extensive, otherwise conflicts with Ten Mile Creek and its floodplain would occur.

Since no net loss of wetland habitat can occur and since the original wetland was created from quarrying operations, perhaps the fill required for the overpass structure could be quarried from an area near or adjacent to the existing wetland. This would provide some continuity of the habitat and may actually result in an enhancement of the wetland area.

This is proposed and discussed in Section A4.8 WETLANDS.

This is discussed in Section A4.8 WETLANDS.



The present overpass structure at the Prospect Avenue Interchange does not provide adequate access for pedestrian and bicycle traffic. This situation has created conflicts between vehicles, cyclists, and pedestrians, as each type of traffic have increased over the years. It is important that the proposed North Valley Interchange provide for pedestrian and bicycle access in the typical section for Forestvale Road, including the overpass section. This is particularly critical due to the location of residences, Rossiter School, Sierra Park, and probable future commercial development in the general area.

If you have any questions, or need additional information, please contact me at 447-6374. Thank you for the opportunity to comment.

Sincerely,

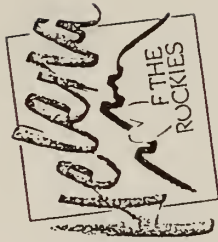


Robert Rasmussen, Director
LEWIS AND CLARK COUNTY PLANNING DEPARTMENT

cc: Board of County Commissioners

The proposed interstate crossroad bridge will include a walkway/bikeway for its entire length. The crossroad (Forestvale Road) will be constructed with a 40 foot pavement width which will include two 24 foot driving lanes and 8 foot shoulders. The 8 foot shoulders will be suitable for pedestrian and bicycle traffic.

HELENA AREA CHAMBER OF COMMERCE



April 23, 1991

David S. Johnson
Preconstruction Engineer
Montana Department of Highways
2701 Prospect Avenue
Helena, MT 59620

Subject: Interstate 15 - North Helena Valley Interchange
IR 15-4 (65) 197

Dear Mr. Johnson:

On behalf of the Helena Area Chamber of Commerce, Streets and Highways Committee, I would like to extend to the Department our strong support for development of the North Helena Valley Interchange.

This project will have immediate and long term benefits for transportation in and around Helena. As I'm sure you are aware, this interchange was recommended in the 1981 update of Helena's Transportation Plan. Recognizing that the improvement was justified ten years ago, I am confident that the need to construct this interchange will be emphasized once again in the upcoming 1991 update to the city's Transportation Plan.

The Purpose and Need statement in your draft EIS appears to be appropriate for the project, and it certainly is consistent with our goals for transportation development in and around the city of Helena. We recognize that each alternate under consideration presents some problems in terms of environmental consequences, safety, right-of-way, and/or other economic considerations. We also assert, however, that right-of-way, relocation, and other related costs will only become more of a problem as the project is delayed. Accordingly, we strongly encourage MDOH to keep the project moving, and plan for construction as soon as possible.

Thank you for the Department's attention to this much needed transportation improvement. Please let me know if I or any other member of the Helena Area Chamber of Commerce can help promote the project, or in any other way encourage its progress.

Sincerely yours,
Streets & Highways Committee

Shawn L. Foutch

Shawn L. Foutch
Chairman

Initial	
Attach	
MAIL ROUTE	
Date Recd	
Reconst	
Engr	
30 Preconst Engr	
30 Office Mgr	
30 Road Design	
30 Hydraulics	
30 Survey & Mapping	
30 Traffic	
30 Assistant	



RECEIVED

31 MAY -2 AM 8:54
DEPARTMENT OF HIGHWAYS

30 April 1991

John Rothwell, Director
Department of Highways
2701 Prospect Avenue
Helena, Montana 59620

Dear Mr. Rothwell:

We urge you to do everything possible to further the planning and construction of an interchange in the North Helena Valley (I-15).

On the basis of information available, we favor Alternative B (Forestvale Road) but if that proves not to be feasible we would welcome whatever location your department deems to be most favorable. We feel strongly that this is the most important step toward creating a safer traffic environment in this area - particularly on Montana Avenue.

Thank you for whatever you can do to expedite this project!

Sincerely,

Walter Nelson
Walter Nelson
1012 Middlemas Road
Helena, Montana 59601

May 2, 1991

Elizabeth M. Bacon
1050 Sierra Road West
Helena, Montana 59601

To David S. Johnson,

We are concerned, as residence of the north Helena valley, about the possible alternative of building an interchange off interstate 15 in front of Rossiter School. We have two young children and traffic in the area of the school is very busy now. Increased traffic would make the school area unsafe and could not be tolerated. We feel the alternative

As indicated in the draft EIS, the preferred alternative, Alternative B, will be constructed at an extension of Forestvale Road, approximately 1/2 mile south of Sierra Road where the Rossiter School is located. Alternative B is projected to cause a decrease in traffic volumes in front of the school, as indicated in 4.2 TRAFFIC of the draft EIS.

CV



of having the interchange by
Forestale Rd would be better
and accomplish the same goal,
of reducing traffic on North
Montana ave.

Sincerely

Elizabeth and Roger Bacon

458-6461

Date Recd. Preconst.	5/7/71	Initial
Info		Attach
Act		
	MAIL ROUTE	
	30 Preconst Engr	
	30 Assistant	
	30 Office Mgr	
	32 Paper Design	
	33 Est. - Invent	
	34 Materials	
	35 Survey & Mapping	
	36 Traffic	
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Information Unit
Director's Office
envelope

Helena, Mt. 59501
May 5, 1991

David S. Johnson
Preconstruction Engineer
Montana Department of Highways
Helena, MT 59542

Re: FHWA-MT-EIS-91-01-D
Project IR15-4 (65) 197

Dear Mr. Johnson:

We are writing in response to the above referenced draft.

By means of identification, we are the residents of Roadway site No. 3 of the proposed Forestvale extension of your department's Alternative Plan B.

First, be it known that we purchased our home and 4.69 acres because of its' unique isolated location with no traffic, low noise level, a place for our horses, room for our daughter to learn to drive her electric wheelchair, etc.

We are not in favor of the interchange going in near the Rossiter School for all of the obvious reasons. At this time it appears that this is the consensus of opinion and that Alternative Plan B is going to be a reality.

According to Figure 5-2 of the EIS Draft the proposed extension of Forestvale starts at North Montana and takes an obvious jog at the Northwest corner of our property to be all inclusive on our property and leave the Gun Club virtually unscathed. It hardly seems right to take over 20% of our land when the Gun Club has so much. We always thought when a roadway needed go in on a common property line the two property owners equally shared the burden of giving up their land.

No one from the Highway Department has been in touch with us about this Alternative Plan B nor were we aware of any Stoping Meetings. The above referenced draft has been our only source of information. We would be interested in talking with someone from your Department regarding this matter.

Very truly yours,

David and Carol Lode

Date Recd.	Preconst.	5/7/91	Initial
Info	Act	MAIL ROUTE	Attach
		30 Preconst Engr	
		30 Assistant	
		30 Office Mgr	
		32 Road Design	
		33 Environment	
		34 Hydraulics	
		35 Survey & Mapping	
		36 Traffic	
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The proposed Alternative B has been located to, as much as possible, avoid wetland impacts and to avoid conflict with the safety zones for the gun club shooting pits and to avoid conflict with and relocation of existing homes and structures as much as possible. Approximately 1.0 acres of new right-of-way will be required from the gun club (the club's total ownership area is approximately 70 acres) and approximately 1.8 acres (the Lode's total ownership area is 4.7 acres) of new right-of-way will be required from Mr. and Mrs. Lode. No relocations of homes or businesses will be required on either property.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



ER 91/269

MAY 7 1991

Mr. Roger K. Scott
Division Administrator
Federal Highway Administration
301 South Park Street
Mail Drawer 10056
Helena, Montana 59626-0056

Dear Mr. Scott:

This responds to your request for the Department of the Interior's comments on the Draft Environmental Impact Statement for I-15 North Helena Valley Interchange, Lewis and Clark County, Montana.

SECTION 4(f) COMMENTS

We concur with your preferred alternative, Alternative B, since it would not impact the two Section 4(f) properties in the project vicinity, Sierra Park and the historic Little Red Schoolhouse.

ENVIRONMENTAL STATEMENT COMMENTS

The draft environmental statement adequately addresses impacts of concern to this Department. We note that your preferred alternative, Alternative B, results in fewer overall impacts than Alternative A.

Thank you for the opportunity to provide these comments.

Sincerely,

Jonathan P. Deason
Jonathan P. Deason
Director
Office of Environmental Affairs

RECEIVED
MAY 18 1991

cc: David S. Johnson
Preconstruction Engineer
Montana Department of Highways
2701 Prospect Avenue
Helena, Montana 59620

