



**DRAFT ENVIRONMENTAL ASSESSMENT**

**June 2, 2026**

**Waste Management and Remediation Division  
Montana Department of Environmental Quality**

<b>PROJECT/SITE NAME: R &amp; R Diesel Repair</b>	
<b>APPLICANT/COMPANY NAME: R &amp; R Diesel Repair</b>	
<b>PERMIT/LICENSE NUMBER: MVWF-0410</b>	
<b>LOCATION: 1060 Blaine St, Helena</b>	<b>COUNTY: Lewis &amp; Clark</b>
<b>PROPERTY OWNERSHIP:      FEDERAL ____ STATE ____ PRIVATE <u>X</u></b>	

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# **1. PURPOSE AND NEED FOR PROPOSED ACTION**

## **1.1 AUTHORIZING ACTION**

Under the Montana Environmental Policy Act (MEPA), Title 75, chapter 1, parts 1-3, Montana Code Annotated (MCA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on Montana's environment. The proposed action is a state action that may have an impact on Montana's environment. Therefore, the Department of Environmental Quality (DEQ) must prepare an environmental assessment (EA). This EA will examine the proposed action and alternatives to the proposed action and disclose potential impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

## **1.2 DESCRIPTION OF DEQ REGULATORY OVERSIGHT**

DEQ has the statutory authority to review activities proposed under the Solid Waste Management Act, the Septage Disposal Licensure Act, and the Motor Vehicle Disposal & Recycling Act and ensure compliance with current regulations. The Solid Waste Section (SWS) is a part of the Waste Management Bureau, in the Waste Management and Remediation Division of the DEQ. The Motor Vehicle Recycling & Disposal Act, Title 75, chapter 10, part 5, Montana Code Annotated (MCA), and the Administrative Rules of Montana (ARM), Title 17, chapter 50, subchapter 2 provides the authority for the Motor Vehicle Recycling & Disposal Program (MVRDP) to license and regulate motor vehicle wrecking facilities in the state of Montana.

## **1.3 PROPOSED ACTION**

R & R Diesel Repair has applied to DEQ for a Motor Vehicle Wrecking Facility (MVWF) license. The proposed action would be located on private land in Lewis & Clark County, Montana. All information included in this EA is derived from the permit application, discussions with the applicant, analysis of aerial photography, topographic maps, and other research tools.

DEQ's issuance of a MVWF license would allow the applicant to buy, sell, or deal in four or more vehicles per year of a type required to be licensed, for the purpose of wrecking, dismantling, disassembling, or substantially altering the form of the motor vehicle.

**Table 1: Summary of Proposed Action**

Proposed Action	
<b>General Overview</b>	R & R Diesel Repair submitted a license application to DEQ's SWS for a MVWF in Lewis & Clark County. R & R Diesel Repair is currently operating at this site providing general maintenance, minor and major engine repair, complete overhauls, electronic diagnostics and repair, driveline service and air conditioning service.
<b>Hours of Operation</b>	R & R Diesel Repair operates Monday through Friday from 8:00 am to 5:00 pm and Saturday 8 am to 12 pm.
<b>Estimated Disturbance</b>	The applicant proposes to license 0.75 acres of their 5.74-acre property.
<b>Construction Equipment</b>	NONE
<b>Personnel Onsite</b>	Six to seven personnel.
<b>Location and Analysis Area</b>	<p><b>Location:</b> The MVWF would be in Lewis &amp; Clark County. The proposed acreage would be within a fenced area at 1060 Blaine St., Helena, Montana. The legal description of the additional acreage is: HEWINS ADDN, S28, T10 N, R03 W, BLOCK 4, Lot 10, &amp; N10' VAC ALLEY COS #3051260.</p> <p><b>Analysis Area:</b> The area being analyzed for this environmental review includes the immediate 0.75-acre project area, immediate downstream water sources, neighboring lands surrounding the analysis area within a reasonable distance for each resource considered (Figure 1).</p>
The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.	
<b>Air Quality</b>	The applicant would continue to capture and dispose of refrigerant from vehicles, complying with EPA regulations. The applicant would be required to comply with all applicable local, county, state, and federal requirements pertaining to dust and dust management.
<b>Water Quality</b>	The applicant would continue to drain fluids over an impermeable pad to prevent spills and run-off from the facility. Fluids are stored and disposed of according to company procedures.
<b>Erosion Control and Sediment Transport</b>	Run-on and run-off would be controlled at the site via berms which would surround the 0.75-acre area. The area is sloped so that excess storm water would run to the north, remaining on the property until it can infiltrate the ground.
<b>Solid Waste</b>	Solid waste is currently regularly hauled offsite by Lewis & Clark County Solid Waste Services and would continue under the proposed action.
<b>Cultural Resources</b>	The applicant has not proposed any actions that would reduce any potential impacts to cultural resources. In a letter to the applicant, SHPO noted that there have been a few previously recorded historic sites occur within the designated search locales. However, SHPO stated that as long as there would

	<p>be no disturbance or alteration to structures over fifty years of age, there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, stated that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials are inadvertently discovered during this project, SHPO asked that their office be contacted, and the site investigated.</p> <p>The applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to cultural resources.</p>
<b>Hazardous Substances</b>	The applicant would continue to dispose of any hazardous substances in accordance with all applicable local, county, state, and federal rules and regulations.
<b>Reclamation</b>	N/A

<b>Cumulative Impact Considerations</b>	
<b>Past Actions</b>	The current business has been operating at this site since 1978. There are 2 motor vehicle wrecking facilities within 2 miles, with the nearest being approximately 1 mile away. Junk vehicles would be stored at a location where no past junk vehicle facilities have been permitted.
<b>Present Actions</b>	This 0.75-acre site is leveled, graveled and fenced. This site would be used to store vehicles for R & R Diesel Repair.
<b>Related Future Actions</b>	The Applicant may submit additional applications to amend the MVWF license, which DEQ would review pursuant to the Motor Vehicle Recycling & Disposal Act and rules adopted under the Act at that time. Any subsequent approvals would undergo a separate environmental review under MEPA.

#### **1.4 PURPOSE AND NEED**

DEQ's purpose in conducting this environmental review is to act upon R & R Diesel Repair's application for a license to operate a motor vehicle wrecking facility. DEQ's action on the permit application is governed by Title 75, chapter 10, part 5, Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM) Title 17, chapter 50, subchapter 2.

The applicant's purpose and need, as expressed to DEQ in proposing this action, is to permit a MVWF license on this property for the purpose of collecting and storing junk motor vehicles.

**Figure 1: Location of Proposed Site, Aerial View**



*Source: Google Maps*

### **1.5 OTHER GOVERNMENTAL AGENCIES AND PROGRAMS WITH JURISDICTION:**

The proposed project would be located on private property. All applicable local, state, and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: Lewis & Clark County.

## **2. AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE**

### **2.1 EVALUATION AND SUMMARY OF POTENTIAL IMPACTS**

The impact analysis will identify and evaluate direct and secondary impacts to the physical environment and human population in the area to be affected by the proposed project. Direct impacts occur at the same time and place as the action that causes the impact. Secondary impacts are a further impact to Montana's environment that may be stimulated, induced by, or otherwise result from a direct impact of the action. (ARM 17.4.603(18)) Where impacts would occur, the impacts will be described in this analysis.

Cumulative impacts are the collective impacts on Montana's environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and

present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures. The projects identified in Table 1 were analyzed as part of the cumulative impacts assessment for each resource.

The duration is quantified as follows:

- **Construction Impacts (short-term):** These are impacts to the environment during the construction period. When analyzing duration, please include a specific range of time.
- **Operation Impacts (long-term):** These are impacts to the environment during the operational period. When analyzing duration, please include a specific range of time.

The intensity of the impacts is measured using the following:

- **No impact:** There would be no change from current conditions.
- **Negligible:** An adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor:** The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate:** The effect would be easily identifiable and would change the function or integrity of the resource.
- **Major:** The effect would alter the resource.

#### 1. **GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE**

The soils in the vicinity of the site are classified by the U.S. Natural Resource Conservation Service as Urban Land. The predominant soil type is the Musselshell-Crago complex. These deposits are composed of coarse-loamy alluvium derived from limestone. These soils are well drained, and the water table typically begins at a depth of 80 inches for this soil type.

**Figure 2: Soils Map**



*Source: USDA-NRCS, Web Soil Survey, Lewis & Clark County, Montana*

**Direct Impacts**

Waste anti-freeze, gasoline, and lubricating oils contain petroleum distillates, heavy metals, and possibly toxic compounds would be located within the proposed facility. Some residual lubricating oils and antifreeze may drip from the vehicles stored at the facility. This residual dripping is not expected to result in heavy soil accumulations, because the junk vehicles would have the fluids removed over an impermeable pad.

Available information was obtained from the application, analysis of aerial photography, topographic maps, geologic maps, soil maps, and other research tools listed in the reference section below. Based on this information, DEQ does not anticipate a detrimental impact to geology and soil quality, stability and moisture. No unusual or unstable geologic features are present, and no fragile or particularly erosive or unstable soils are present.

**Secondary Impacts**

The proposed action could result in soil disturbance and minor subsequent erosion of disturbed soil, and sediment could be transported offsite via stormwater. Surface soil disturbance could allow for the establishment of weeds.

**Cumulative Impacts**

Erosion and soil loss within the proposed facility area would add to cumulative impacts associated with erosion and soil loss on existing roads, industrial properties, and other historical disturbances

surrounding the proposed project area.

## 2. **WATER QUALITY, QUANTITY AND DISTRIBUTION**

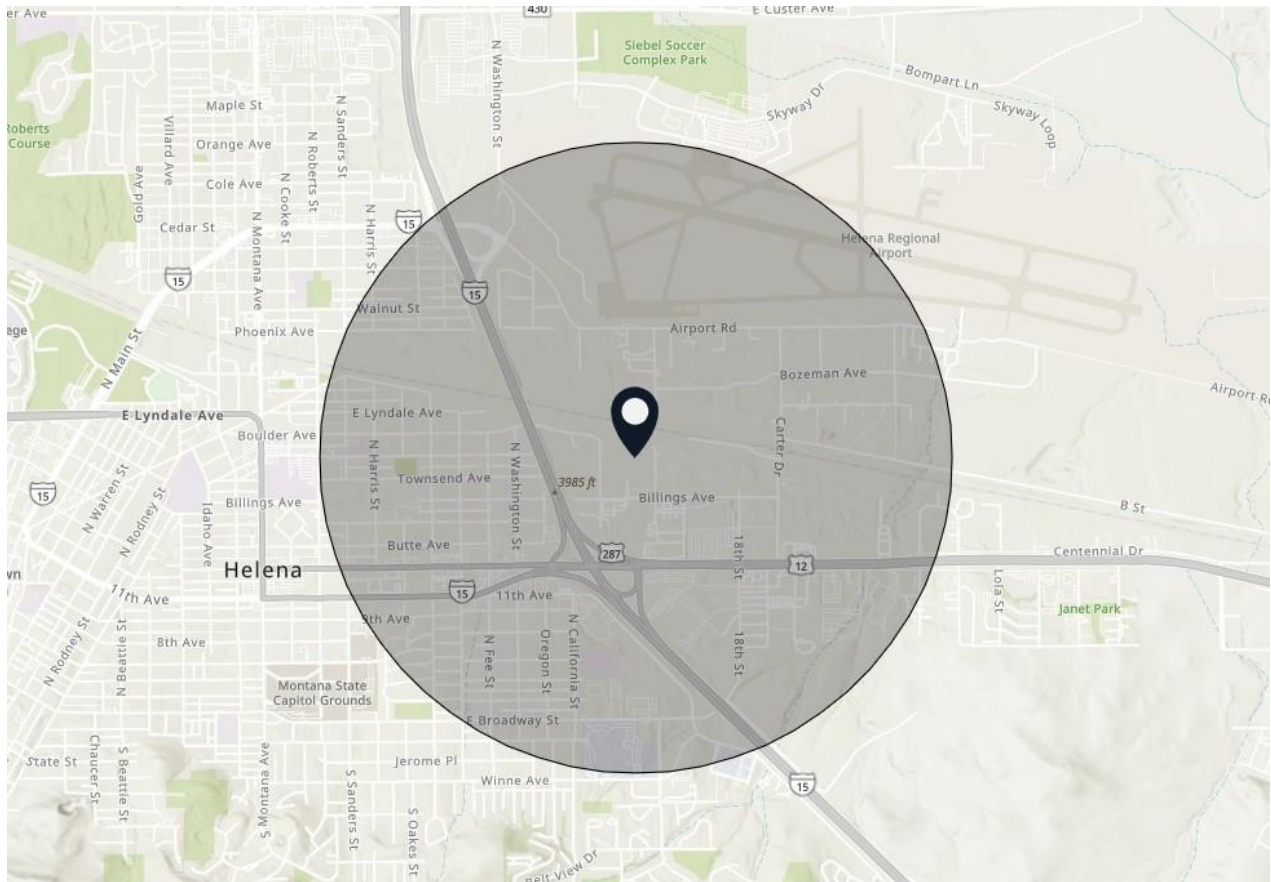
Precipitation in the area has an annual accumulation of approximately 12.6 inches ([Helena Chamber of Commerce](#)). The Federal Emergency Management Agency (FEMA) has characterized the area as having minimal flood potential ([FEMA 2026](#)). There are no major river or irrigation ditches located within a one-mile radius of the proposed site as seen in Figure 3 below. The nearest surface water body is an intermittent stream as mapped by the USGS. Although the stream is mapped as close as 0.1 miles east of the proposed facility, the defined channel is only clearly visible on aerial imagery 0.25 miles to the northeast of the proposed facility location.

Existing on-site surface flow patterns indicate that any precipitation or surface water would flow toward the north of the 0.75-acre proposed facility. However, the property is leveled with gravel, so any precipitation or surface water would puddle on site or infiltrate into the subsurface. The application also states that the facility would be surrounded by a berm, which would prevent any stormwater runoff.

The proposed site does not contain any areas that are designated as wetland habitat by the United States Fish and Wildlife Service ([USFWS, 2026](#)) and the Montana National Heritage Program (MTNHP). The site is located within one mile of riverine, freshwater emergent wetland, which are located to the north of the proposed facility.

DEQ's Water Quality Division may require the Applicant to obtain various permits. The Montana Pollutant Discharge Elimination System (MPDES) Permit regulates wastewater discharges by limiting the quantities of pollutants to be discharged. Additionally, any facility that has potential to discharge industrial storm water to "state waters" is required to apply for the Multi-Sector General Permit (MSGP).

**Figure 3: Surface Waters**



*(Source: Discover DEQ Throughout Montana Web Map)*

**Direct Impacts**

Waste anti-freeze, gasoline, and lubricating oils contain petroleum distillates, heavy metals, and possibly toxic compounds would be located within the proposed facility. Some residual lubricating oils and antifreeze may drip from the vehicles stored at the facility. This residual dripping is not expected to result in heavy soil accumulations, because the junk vehicles would have the fluids removed over an impermeable pad. Minor impacts to surface or groundwater could occur from the above mentioned residual dripping from stored vehicles. The proposed site is in an industrial area where buildings, concrete, and other infrastructure is already in place. Vehicles would not be disassembled on this site, and fluids are drained at the shop, which site a few hundred feet to the South, over an impermeable pad and disposed of according to company procedures.

**Secondary Impacts**

No secondary impacts to surface or groundwater would be expected to occur from the proposed action. Flood impacts are not anticipated to affect the proposed site. Vertical migration of contaminants would be negligible since fluids would be drained in the shop over an impermeable pad.

### ***Cumulative Impacts***

Erosion and the subsequent sedimentation of surface water would add to cumulative impacts associated with potential erosion on existing roads, industrial properties, and other historical disturbances in the proposed facility area.

### **3. AIR QUALITY**

The Gates of the Mountains Wilderness is the closest Class 1 Airshed to the project site, located roughly 17 miles northeast. This project would not be expected to impact this type of airshed due to the distance between the proposed location and the airshed.

#### ***Direct Impacts***

Fugitive dust could be generated from normal site activities during operation. Automotive fluids and refrigerants would be removed from vehicles over an impermeable pad. Therefore, the impact on air quality from automotive fluids and refrigerants is expected to be negligible.

#### ***Secondary Impacts***

The applicant proposes to dispose of any chemicals that may release airborne pollutants in the appropriate and regulatory manner. Therefore, impacts would be negligible.

#### ***Cumulative Impacts***

Impacts to air quality from fugitive dust would add to cumulative impacts associated with nearby highway travel and other agricultural activities in the analysis area.

### **4. VEGETATION COVER, QUANTITY AND QUALITY**

There are no known rare or sensitive plants or cover types present within the proposed facility area. No known fragile or unique resources or values, or resources of statewide or societal importance, are present within the proposed facility area.

Land cover in the immediate area is characterized by the Montana Natural Heritage Program (MTNHP) as follows:

- 81% Human Land Use
- 18% Grassland Systems
- 1% Shrubland, Steppe and Savanah Systems
- <1% Forest and Woodland Systems
- <1% Recently Disturbed or Modified
- <1% Wetland and Riparian Systems

All vegetation within the 0.75-acre area was removed and replaced with a gravel lot prior to permit submittal. The applicant would be required to follow any weed control requirements set forth by the Lewis & Clark County Weed Department to prevent the propagation of noxious weeds.

#### ***Direct Impacts***

This wrecking facility is surrounded by industrial and commercial areas. The impacts caused by the establishment of the wrecking facility would not be expected to further impact the area's ecosystem as it is in a previously developed area near a major highway. There would be no further impact to the quality and/or quantity of the vegetative cover on the property as the site is already developed.

***Secondary Impacts***

Land disturbance at the site may result in the propagation of noxious weeds. The project area would be subject to the 2017 Montana Noxious Weed Management Plan and any additional measures required by the Lewis & Clark County Weed Department.

***Cumulative Impacts***

Propagation of noxious weeds could add to other noxious weed issues in the surrounding area. The proposed action and subsequent reclamation could cause a change in species composition in the vicinity. This impact could be long-term to permanent. However, the applicant would be required to implement weed-management measures consistent with the Lewis & Clark County Weed Department and the Montana County Noxious Weed Control Act, including monitoring and treating noxious weeds. With weed control measures in place, establishment and spread of noxious weeds would not be expected to result in additional, measurable cumulative impacts on vegetation cover, quantity, or quality in the broader analysis area.

**5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS**

The proposed site is located in an urban, industrial area adjacent to prairie and grassland habitat. The site would be located in an already developed and disturbed urban area in Helena, MT.

The Montana Natural Heritage Program (MNHP) lists the following species of concern that may be in the vicinity of the proposed site: Black-tailed Prairie Dog, Grizzly Bear, Little Brown Myotis, Northern Hoary Bat, Silver-haired Bat, Bobolink, Brewer’s Sparrow, Brown Creeper, Cassin’s Finch, Clark’s Nutcracker, Evening Gosbeak, Flammulated Owl, Great Blue Heron, Green-tailed Towhee, Lewis’s Woodpecker, Loggerhead Shrike, Long-billed Curlew, Pileated Woodpecker, Pinyon Jay, Veery.

However, since the proposed area has operated as a commercial business since 1978, no habitat would be found here suitable for aquatic, terrestrial, or avian life. The proposed area does not contain any areas that are designated as wetland habitat by the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) or the Montana National Heritage Program (MTNHP, 2023).

***Direct Impacts***

No further impacts to terrestrial, avian, and aquatic life from operations would be expected because of the proposed action. The proposed site is in a commercially developed area that has some surrounding available habitat for the species described above. Transient wildlife populations, including whitetail deer, mule deer, many bird species, and more occupy the habitat within and surrounding the facility area. Transient, by definition, means “lasting only for a short time,” or “impermanent.” Such species exhibit transient behavior, relocating regularly and rarely remaining in one area for long periods of time.

***Secondary Impacts***

No secondary impacts to terrestrial, avian, and aquatic life and habitats stimulated or induced by the direct impacts analyzed above would be expected, because effects would be minor, temporary, and confined to already disturbed lands in the immediate project area.

***Cumulative Impacts***

Displacement of individuals and habitat fragmentation to terrestrial, avian, and aquatic life and habitats could add to similar impacts from other commercial, industrial, and residential activities in the area.

## 6. HISTORY, CULTURE AND ARCHEOLOGICAL UNIQUENESS

Under the Motor Vehicle Recycling & Disposal Act, all applicants are required to contact the State Historic Preservation Office (SHPO) to determine whether the activities at the site would interfere with any historical site at or near the property.

In a letter to the applicant, SHPO noted that there have been a few previously recorded historic sites occur within the designated search locales. However, SHPO stated that as long as there would be no disturbance or alteration to structures over fifty years of age, there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, stated that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials are inadvertently discovered during this project, SHPO asks that their office be contacted, and the site investigated.

### ***Direct Impacts***

Based on the information gathered from the SHPO, the proposed facility would not impact cultural resources in the area. It is not anticipated that this project would cause a shift in any unique quality of the area.

### ***Secondary Impacts***

No secondary impacts to historical and archaeological resources would be expected from the proposed facility. As the proposed project site is in a previously disturbed area.

### ***Cumulative Impacts***

No cumulative impacts to historical and archaeological resources would be expected from the proposed facility.

## 7. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY

No unusual demands on land, water, air, or energy are anticipated from the proposed MVWF. Examples of unusual demands, which are not anticipated from this proposed MVWF, would be rerouting creeks, rebuilding of roads, or relocated specific utilities.

The applicant is required to comply with all applicable federal, state, county, and local regulations and ordinances, permits, licenses, and approvals for the operation of the site.

### ***Direct Impacts***

Based on the analysis of available data DEQ does not foresee any unusual demands on land, water, air, or energy from this MVWF. Therefore, no direct impacts would be anticipated.

### ***Secondary Impacts***

No secondary impacts to environmental resources of land, water, air, or energy would be expected.

### ***Cumulative Impacts***

No cumulative impacts on the environmental resources of land, air or energy are expected from

the proposed action.

#### 8. **IMPACTS ON OTHER ENVIRONMENTAL RESOURCES**

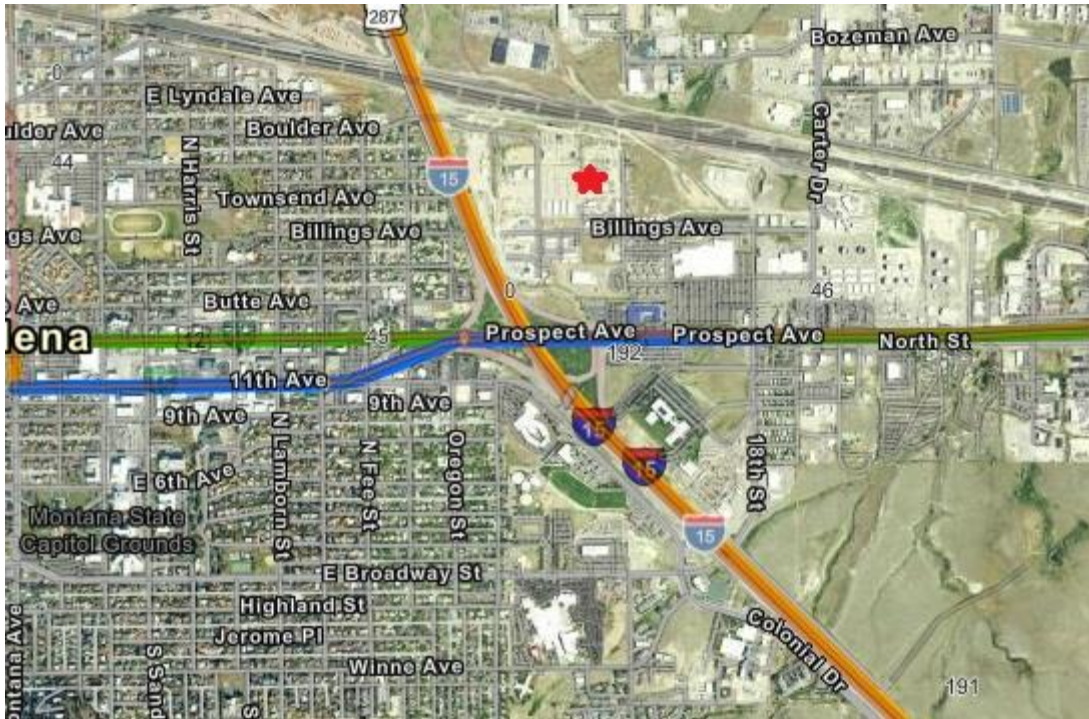
DEQ reviewed available information from the Montana Department of Natural Resources and Conservation, Montana Department of Environmental Quality, Montana Department of Transportation (MDT), the City of Helena, and the U.S. Bureau of Land Management to identify other projects or activities that would rely on or be directly affected by the specific lands, facilities, or resources used by the proposed project.

Three MDT construction projects were identified near the proposed project area. The SF189 HLNA HT MEDIAN CABLERAIL safety project (9796000) is in design and construction and is anticipated in Calendar Year 2030. This project will install a median barrier from RP 174, approximately 2-miles south of Jefferson City, to RP 204 about 9-miles north of Helena City limits on I-15 to address cross median related crashes.

The second MDT project is the 11TH AVE / PROSPECT AVE-HELENA rehabilitation project (10314000) that is in design and construction is anticipated in Calendar Year 2028. This project proposes to remove the top layer of pavement and replace it with new asphalt on 11th Avenue, between Montana Avenue and Wal-Mart. Five sections with underperforming asphalt will be “dug out” to remove the soil beneath the roadway that is accelerating the breakdown of the asphalt. Signing will be replaced throughout, and some locations will receive wheelchair ramp upgrades and new push button pedestrian poles to meet current ADA guidelines.

The third MDT project is PROSPECT AVE - MONTANA TO I-15, a resurface project (10312000) that is in design and construction is anticipated in Calendar Year 2027. This project proposes to remove the top layer of pavement and replace it with new asphalt along Prospect Avenue, between Montana Avenue and the Capitol Interchange. Signing will be replaced, and some sidewalk ramps and ADA features will be updated. However, DEQ does not anticipate that the roadway projects would experience direct interference or resource conflicts from the proposed action.

Figure 4: MDT Active Projects Map



(Source: MDT Active Projects Interactive Web Map)

***Direct Impacts***

No nearby activities or projects were identified that would be affected by the proposed project. No direct impacts on other environmental resources would be expected from the proposed action.

***Secondary Impacts***

No secondary impacts on other environmental resources would be expected from the proposed action.

***Cumulative Impacts***

No cumulative impacts to other environmental resources would be expected from the proposed action.

**9. HUMAN HEALTH AND SAFETY**

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor. Few, if any, members of the public would be in immediate proximity to the project during construction or operations.

***Direct Impacts***

Direct impacts to human health and safety to the applicant's staff could occur from this proposed action, however compliance with OSHA standards would substantially reduce risk. The respiration of exhaust fumes and the ingestion of dust generated by equipment during construction would be minimized with proper personal protection equipment.

Counties are required to inspect MVWFs for compliance at least annually to assure compliance with all applicable rules and regulations. The Lewis & Clark County Environmental Health Division and DEQ's SWS would perform routine inspections and provide compliance assistance while the facility is operational.

***Secondary Impacts***

No secondary impacts on human health and safety would be expected because of the proposed work.

***Cumulative Impacts***

No cumulative impacts on human health and safety would be expected from the proposed action.

**10. INDUSTRIAL, COMMERCIAL, AND AGRICULTURAL ACTIVITIES AND PRODUCTION**

The proposed facility area has not been utilized to store junk vehicles in the past. The acreage listed in the application is currently in an industrial/commercial use, but would be converted to a MVWF.

***Direct Impacts***

No direct impacts to industrial, commercial, and agricultural activities and production in the area would be expected from the proposed action.

***Secondary Impacts***

No secondary impacts to industrial, commercial, and agricultural activities and production in the area would be expected from the proposed action.

***Cumulative Impacts***

No cumulative impacts to industrial, commercial, and agricultural activities and production in the area would be expected from the proposed action.

**11. QUANTITY AND DISTRIBUTION OF EMPLOYMENT**

Existing employees would likely be utilized for this facility, but the application did not state whether additional employees would be hired or not. It is not anticipated that this proposed action would create, move, or eliminate jobs.

***Direct Impacts***

Direct impacts on quantity and distribution of employment would not likely result from this proposed action. No lasting positive or negative impacts to employment would be expected from this proposed action.

***Secondary Impacts***

No secondary impacts to quantity and distribution of employment would be expected from the proposed action.

***Cumulative Impacts***

No cumulative impacts on the quantity and distribution of employment would be expected from the proposed action.

## 12. LOCAL AND STATE TAX BASE AND TAX REVENUES

The proposed action would have a limited increase in tax revenue related primarily to payroll taxes from the proposed action and the purchase of some local goods and services.

### ***Direct Impacts***

Some limited benefit to the local and state economy could result from this proposed action through wages, withholding taxes, and local spending by workers and the company. However, due to the limited employment opportunities associated with the facility, only minimal tax revenue from income, property, or gross receipts would be expected.

### ***Secondary Impacts***

No secondary impacts to local and state tax base and tax revenues would be expected from the proposed action.

### ***Cumulative Impacts***

The proposed action would provide only a small addition to the existing local and state tax base associated other economic activity in the Helena, MT area, and no notable cumulative impacts on local or state tax revenues are expected from the proposed action.

## 13. DEMAND FOR GOVERNMENT SERVICES

The proposed vehicle wrecking and storage activities would add a minimal amount of traffic to existing roads in the immediate facility area. The increased traffic would occur during the life of the facility.

The Helena Police Department would provide law enforcement presence throughout Helena, including around the project area. Emergency Medical Services would be based at St. Peter's Health, located approximately 1.0 miles to the south of the project area. All operations would be subject to local, seasonal restrictions as they apply.

### ***Direct Impacts***

Some impacts on the demand for government services could result from this proposed action through increased vehicle traffic on local roadways.

### ***Secondary Impacts***

No secondary impacts to the demand for government services would be expected from the proposed action.

### ***Cumulative Impacts***

No cumulative impacts to demand on government services would be expected from the proposed action.

## 14. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS

The proposed MVWF would occur on private-owned lands within Lewis & Clark County. The establishment of a MVWF at this location does not conflict with any existing zoning ordinances, as certified by Rachel Ward, Lewis & Clark County Planning Department. The proposed MVWF site is within an area zoned for industrial and commercial use.

The proposed facility area would be subject to any plans or rules set forth by Lewis & Clark County Weed Department and the 2017 Montana Noxious Weed Management Plan.

The Montana Motor Vehicle Recycling and Disposal Program (MVRDP) provides grants to fund individual counties to run their junk vehicle programs. The intent of these programs is to remove unwanted vehicles free of charge, and to regulate activities at licensed MVWFs.

DEQ is aware of the following policies and plans:

- 2019 City of Helena Growth Policy
- 2025 Lewis and Clark Growth Policy Plan

None of the above listed policies or plans would impact the issuance of a MVWF license as long as the application complies with the requirements of the Solid Waste Management Act and the Motor Vehicle Disposal & Recycling Act. The applicant would be required to comply with all laws and to obtain all required permits, licenses, or approvals for operation of the facility.

***Direct Impacts***

DEQ is not aware of any other locally-adopted environmental plans or goals that would impact this proposed action or the project area. Impacts from or to locally-adopted environmental plans and goals would not be expected as a result of this proposed action. The proposed action would occur on privately-owned lands.

***Secondary Impacts***

No secondary impacts from or to locally adopted environmental plans and goals would be expected because of the proposed action.

***Cumulative Impacts***

No cumulative impacts from or to locally adopted environmental plans and goals would be expected from the proposed action.

**15. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES**

The proposed activities would occur on privately-owned lands. Access to the proposed facility would be restricted to the general public. There are no designated wilderness areas and no recreational opportunities for the general public in the project area.

***Direct Impacts***

Due to the lack of any wilderness area or recreational opportunities, no impact to access and quality of recreational opportunities would be expected from this project.

***Secondary Impacts***

No secondary impacts to the access and quality of recreational opportunities would be expected from the proposed action.

***Cumulative Impacts***

No cumulative impacts to the access or quality of recreational opportunities would be expected from the proposed action.

## 16. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING

Helena is a town in Lewis & Clark County, MT, and had a population of approximately 32,091 people as of the 2020 census conducted by the United States Census Bureau. Lewis & Clark County had a population of approximately 70,793 as of the 2020 Census.

### ***Direct Impacts***

Due to the limited employment opportunities associated with the proposed action, no impact to population density and housing would be expected from this proposed action.

### ***Secondary Impacts***

No secondary impacts to population density and housing would be expected from the proposed action.

### ***Cumulative Impacts***

No cumulative impacts to population density and housing would be expected from the proposed action.

## 17. SOCIAL STRUCTURES AND MORES

DEQ is not aware of any native cultural concerns that would be affected by the proposed facility. Based on the information provided by the applicant, it is not anticipated that this MVWF would disrupt native or traditional lifestyles or communities.

### ***Direct Impacts***

No direct impacts on social structures and mores would be expected from the proposed action.

### ***Secondary Impacts***

No secondary impacts on social structures and mores would be expected from the proposed action.

### ***Cumulative Impacts***

No cumulative impacts to social structures and mores would be expected from the proposed action.

## 18. CULTURAL UNIQUENESS AND DIVERSITY

Based on the information provided by the Applicant, DEQ is not aware of any unique qualities of the area that would be affected by the proposed facility. The site would be located on previously developed land. The nearest junk vehicle facility would be located roughly 1 mile to the east northeast of the proposed facility on Bozeman Ave.

It is not anticipated that this project would cause a shift in some unique quality of the area.

### ***Direct Impacts***

It is not anticipated that this proposed action would cause a shift in some unique quality of the area. No direct impacts to cultural uniqueness and diversity would be expected from the proposed action.

### ***Secondary Impacts***

No secondary impacts to cultural uniqueness and diversity would be expected from the

proposed action.

### ***Cumulative Impacts***

No cumulative impacts to cultural uniqueness and diversity would be expected from the proposed action.

## **19. PRIVATE PROPERTY IMPACTS**

The proposed project would take place on private land owned by the applicant. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Motor Vehicle Disposal & Recycling Act. Therefore, DEQ's approval of an MVWF license would not have private property-taking or damaging implications.

## **20. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES**

Given the project's limited scale, location on previously disturbed private-owned land, and lack of population changes, no other appropriate social or economic circumstances beyond those described in this EA are anticipated.

## **21. GREENHOUSE GAS ANALYSIS**

DEQ is required to evaluate greenhouse gas (GHG) emissions for statutorily defined fossil fuel activity. Section 75-1-211(1)(b), MCA. However, junk motor vehicle related activities are excluded from the definition of fossil fuel activities and therefore a GHG assessment is not mandatory. Section 75-1-220(8), MCA. Instead, to determine if a GHG assessment is needed, DEQ applies the normal MEPA standard of whether GHG emission impacts are potentially significant because of construction and operation of a SWTS. ARM 17.4.609(3)(d)–(e).

DEQ concludes that the construction and operation of a MVWF would likely have no effect on increased GHG entering the atmosphere, and therefore any additional assessment of GHG is not necessary for purposes of this EA.

## **3. DESCRIPTION OF ALTERNATIVES**

Pursuant to ARM 17.4.609, when an applicant proposes an action with the potential to have an impact on the Montana environment, the associated EA must include a description of reasonable alternatives. For the purposes of MEPA, and the minimum requirements of ARMs 17.4.607 and 17.4.609 for EAs, the alternatives analysis must include the "no action" alternative. The "no action" alternative represents the baseline condition in which the proposed activity does not occur. However, if the applicant demonstrates compliance with all applicable rules and regulations required for approval, the "no action" alternative would not be appropriate. Rather, the "no action" alternative forms the baseline from which the impacts of the proposed action can be measured. Pursuant to section 75-1-201(4)(a), MCA, DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment. Therefore, if an application meets all the requirements for permit approval, DEQ cannot require any alternative to the project as described in the permit application, including a "no action" alternative.

### **3.1 ADDITIONAL ALTERNATIVES CONSIDERED**

**No Action Alternative:** In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval of R & R Diesel Repair application for an MVWF license. The applicant would lack the authority to conduct the

proposed activity. Any potential impacts that would result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations required for approval, the “no action” alternative would not be appropriate.

**Other Reasonable Alternative(s):** The “license application approved” alternative. If this alternative is selected, DEQ will approve the application and issue a new license, establishing the site as a MVWF.

A decision by DEQ is prompted when the applicant completes the application for licensure of the proposed activity at the proposed location. However, the applicants may at any time choose to withdraw the application. This would result in DEQ selecting the “no action” alternative because DEQ’s decision would not be necessary. If the applicant withdraws the application, the applicant could seek to locate a similar facility elsewhere.

In consideration of these alternatives, the potential environmental effects of Alternative C were evaluated for the proposed project based on the information provided. DEQ researched the site and surrounding area, which included a site visit. The results of DEQ’s evaluation of potential environmental impacts related to the proposed facility are summarized in Section 3.0.

### **3.2 CONSULTATION**

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries to the following websites/databases/personnel.

- Lewis & Clark County Commissioners
- Montana Department of Natural Resources and Conservation
- Natural Resource Conservation Service
- Montana Historical Society
- State Historic Preservation Office
- U.S. Geological Survey
- Montana Bureau of Mines and Geology
- U.S. Department of Agriculture - Natural Resource Conservation Service
- Montana Natural Heritage Database
- United States Geological Survey Database

### **3.3 NEED FOR FURTHER ANALYSIS AND SIGNIFICANCE OF POTENTIAL IMPACTS**

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in ARM 17.4.608, which are as follows:

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship

- or contribution of the impact to cumulative impacts,
- The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
- The importance to the state and to society of each environmental resource or value that would be affected.
- Any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
- Potential conflict with local, state, or federal laws, requirements, or formal plans.

As described in this EA, the proposed action would authorize collecting and storing junk motor vehicles prior to their disposal on 0.75 acres, all on private-owned lands.

The EA analysis indicates that, with implementation of applicable BMPs and compliance with applicable federal, state, and local requirements, the remaining impacts on Montana's environment of the proposed action would be low to moderate in intensity, localized in extent, and long term in duration. Applicable BMPs are described briefly below, as well as throughout the EA in applicable resource sections and **Error! Reference source not found.** DEQ does not believe that the proposed activities by the applicant would have any growth-inducing or growth-inhibiting aspects, or contribution to cumulative impacts. The proposed facility area does not appear to contain known unique or fragile resources.

There would be no impacts to geology and soils since the site is already developed. Weed control would occur throughout the life of the project and would be implemented consistent with Lewis & Clark County requirements.

Storm water would be controlled via berms and through Best Management Practices (BMPs) under a MSGP for Storm Water Discharges Associated with Industrial Activity (if applicable).

Impacts to air quality would be short term, lasting only for the duration of construction. ARM 17.8.308 requires that the Applicant take reasonable precautions to control airborne particulate matter.

Impacts to terrestrial, avian, and habitats would be minor and would occur throughout the life of the MVWF.

Unique, endangered, fragile, or limited environmental resources have been evaluated. There are no unique or known endangered fragile resources in the project area. SHPO stated that as long as there would be no disturbance or alteration to structures over fifty years of age, there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, stated that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials are inadvertently discovered during this project, SHPO asks that their office be contacted, and the site investigated.

Impacts to viewshed aesthetics is expected to be minor and not significant as required by law, all junk vehicles must be shielded from public view. The applicant has proposed the use of fencing with privacy slats for visual shielding along the boundary of the 0.75-acre disturbance area.

Demands on the environmental resources of land, water, air, or energy would not be significant. Impacts to human health and safety would not be significant as the facility would be closed to the public. Vehicle traffic from the proposed project would contribute to the cumulative impacts to traffic in the city of Helena, MT.

For social and economic resources, the EA concludes that the proposed action would have only limited, long term positive effects on local employment and tax revenues, would not displace existing industrial, commercial, or agricultural activities, and would be generally consistent with the long standing mixed industrial and commercial character of the project area. The limited impacts on employment, tax base, housing, and demand for government services are not expected to result in substantial growth inducing or growth inhibiting effects or conflicts with locally adopted plans, goals, or regulations under ARM 17.4.608. The EA also finds that the proposed action would not result in substantial changes to social structures, cultural uniqueness and diversity, or private property impacts, and would not conflict with local, state, or federal laws, requirements, or formal plans.

Approval of the proposed action does not set any precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the Applicant submits an additional application or amendment to change the boundaries of their license, DEQ would conduct a separate permitting and environmental review process and make a permitting decision based on the criteria set forth in the Motor Vehicle Disposal & Recycling Act, and applicable MEPA requirements. Issuance of this license does not predetermine the level of environmental review for any future proposals; that determination would be made on a case specific basis using the criteria in ARM 17.4.608. Based on consideration of the criteria set forth in ARM 17.4.608, and the analysis presented in this EA, DEQ has determined that the proposed action, Motor Vehicle Wrecking Facility License No. MVWF-0410, is not expected to significantly impact the quality of Montana's environment. Preparation of an EA is therefore the appropriate level of environmental review under MEPA, and an EIS is not required for this action.

#### **4. PUBLIC INVOLVEMENT**

DEQ SWS has notified the Lewis & Clark County Commissioners and adjoining property owners about the application for a MVWF license at 1060 Blaine St, Helena, Montana. The public can submit comments regarding this EA to: [DEQJunkVehicleProgram@mt.gov](mailto:DEQJunkVehicleProgram@mt.gov).

**Comment period ends July 2, 2026**

#### **5. CONCLUSIONS AND FINDINGS**

DEQ finds that an environmental impact statement (EIS) is not needed due to the mitigating factors provided by the solid waste rules and the applicant's application of the MVWF at the selected location. Consequently, these factors would ensure to a reasonable extent that any potential, direct, or cumulative impacts to human health and the environment from the proposed MVWF are minor.

***DEQ has made the preliminary determination that the application meets the minimum requirements of the ARM.*** The application complies with the existing zoning ordinances (as of the date of the submittal of the application) and can effectively shield the proposed facility from all public roads in the area. The proposed MVWF would have minor impacts on the surrounding area as noted in the EA.

**6. Environmental Assessment and Significance Determination Prepared By:**

Brady Christensen, Montana DEQ, Solid Waste Section

**7. Environmental Assessment Reviewed By:**

Fred Collins, Montana DEQ, Solid Waste Section Supervisor

Anne Spezia, Montana DEQ, MEPA Coordinator

Nick Whitaker, Montana DEQ, Staff Attorney

## 8. REFERENCES

- Montana Tech of the University of Montana, Montana Bureau of Mines and Geology (MBMG), Ground Water Information Center <http://mbmggwic.mtech.edu/>
- United States Fish & Wildlife Service, Environmental Conservation Online System, 2023  
<https://ecos.fws.gov/ecp/report/species-listings-by-current-range-county?fips=30095>
- Montana Bureau of Mines and Geology, 2026  
<https://www.mbmgt.mtech.edu/MontanaGeology/GeologicMapping/main.asp#gsc.tab=0>
- Montana Natural Heritage Program, 2023  
<http://mtnhp.org/default.asp>
- Montana Cadastral  
<http://svc.mt.gov/msl/mtcadastral>
- Administrative Rules of Montana  
<https://rules.mt.gov/>
- NRCS National Cooperative Soil Survey, 2023  
<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilsurvey.aspx>
- Google Maps  
<https://www.google.com/maps>
- Montana DEQ's GIS Portal  
<https://gis.mtdeq.us/portal/apps/mapviewer/index.html>
- National Wetlands Inventory, 2023  
<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>
- MT Sage Grouse Habitat Conservation Program, 2023  
<https://sagegrouse.mt.gov/ProgramMap>
- Federal Emergency Management Agency. (2015, November) FEMA Flood Map Service Center, [FEMA Flood Map Service Center | Search By Address](#)
- United States Department of Agriculture (USDA) Web Soil Survey, 2026  
<https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>