DRAFT ENVIRONMENTAL ASSESSMENT

April 2, 2026

Waste Management and Remediation Division
Montana Department of Environmental Quality

TABLE 1: PROJECT OVERVIEW

PROJECT/SITE NAME: Yellowstone County Junk Vehicle	
APPLICANT/COMPANY NAME: Yellowstone County Junk Vehicle	
PROPOSED PERMIT/LICENSE NUMBER: JVCG-0084	
LOCATION: 3246 King Ave E, Billings	**COUNTY: Yellowstone**
PROPERTY OWNERSHIP: FEDERAL ____ STATE ___ COUNTY_X__	

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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

DEQ would issue a new county-run junk vehicle graveyard (JVCG) license as defined by 75-10-501(7), MCA under the Motor Vehicle Recycling & Disposal Act to construct a JVCG. The proposed action would be located on county property, in Yellowstone 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 JVCG license would allow the applicant (Yellowstone County Junk Vehicle Program) to collect unwanted vehicles from the citizens of Yellowstone County. These vehicles would be taken to a local recycler. Abandoned vehicles from the county would be brought into the licensed yard and stored until the owner can be notified. If the owner cannot be found, these vehicles can then be removed and sent to the same recycling facility.

TABLE 1: SUMMARY OF PROPOSED ACTION

Proposed Action	
General Overview	Yellowstone County Junk Vehicle proposes to establish a JVCG in Yellowstone County for the purpose of collecting and storing junk motor vehicles prior to their disposal. The proposed location would be within a 3-acre fenced area on a 9.1-acre county-owned parcel in Billings, Montana. The legal description of the facility is, S15, T01 S, R26 E, C.O.S, 1334, PARCEL 1, (LESS TR 1A COS 1334 1ST AMD) 9.1 AC. The applicant would collect junk vehicle from Yellowstone County residents free of charge for recycling and store abandoned vehicles at the facility.

Hours of Operation	The Yellowstone County Junk Vehicle Program would operate the proposed JVCG Monday through Friday, 7 am to 5 pm.
Estimated Disturbance	The site is currently a relatively flat field. The site would be sloped to direct drainage toward the existing drain field, and a dirt berm would be constructed around the SW corner of the property to shield junk vehicles from public view and for erosion control. All disturbance would be contained within a 3-acre fenced area.
Construction Equipment	A front-end loader would be used for the construction of berms and other initial site preparation. Once the site is prepared, a rollback tow truck would be utilized to haul cars that need to be transported on or offsite.
Personnel Onsite	Two employees of Yellowstone County would be onsite Monday through Friday, 7 am to 5 pm. Occasional tow truck operator during vehicle drop offs or pickups.
Location and Analysis Area	***Location****:* The proposed JVCG would be in Yellowstone County. The proposed location would be within a fenced area at 3246 King Ave E, Billings, Montana. The legal description of the facility is, S15, T01 S, R26 E, C.O.S, 1334, PARCEL 1, (LESS TR 1A COS 1334 1ST AMD) 9.1 AC TR 2G in SE4SE4. ***Analysis Area****:* The area being analyzed for this environmental review includes the immediate 3-acre project area, immediate downstream water sources, neighboring lands surrounding the analysis area within a reasonable distance for each resource considered. Refer to Location Map and any other maps below. (**Figures 1.1** and **1.2**).
The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.	
Air Quality	No refrigerant would be removed from vehicles at this site. The applicant would be required to comply with all applicable local, county, state, and federal requirements pertaining to dust and dust management.
Water Quality	No vehicle fluids are drained at the site. Some minor stains may occur from the storage of abandoned vehicles in the yard, but these are not expected to impact groundwater quality. A berm currently exists along the length of Grey Eagle Ditch to prevent stormwater runoff.
Erosion Control and Sediment Transport	Run-on and run-off would be controlled at the site via berms which will surround the 3-acre licensed area.
Solid Waste	Solid waste would be hauled away by Yellowstone County Solid Waste Services.
Cultural Resources	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 feels that as long as there would be no disturbance or alteration to structures over fifty years of age, SHPO feels that there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, feels 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. The applicant is required to comply with the applicable local, county, state, and federal requirements pertaining to cultural resources.
Hazardous Substances	The applicant proposes to dispose of any hazardous substances in accordance with all applicable local, county, state, and federal rules and regulations.
Reclamation	The JVCG would be a permanent feature. Therefore, there are no plans for reclamation.

Cumulative Impact Considerations	
Past Actions	The nearest junk vehicle facility would be located roughly 1 mile to the northwest of the proposed facility on Orchard Lane. There are an additional three junk vehicle facilities within a roughly 1.5-mile radius. Junk vehicles would be stored at a location where no past junk vehicle facilities have been permitted. The proposed facility location has historically been utilized as a hayfield.
Present Actions	Three buildings and a gravel access road currently exist on the 9.1-acre county-owned parcel. Grey Eagle Ditch runs south to north and is located immediately west of the proposed facility location. The county also owns the neighboring 7.01-acre parcel to the west that is being used for above ground gravel storage and equipment storage as needed. US Interstate 90 is located immediately south of the proposed facility location.
Related Future Actions	None

1.4 PURPOSE, NEED, AND BENEFITS

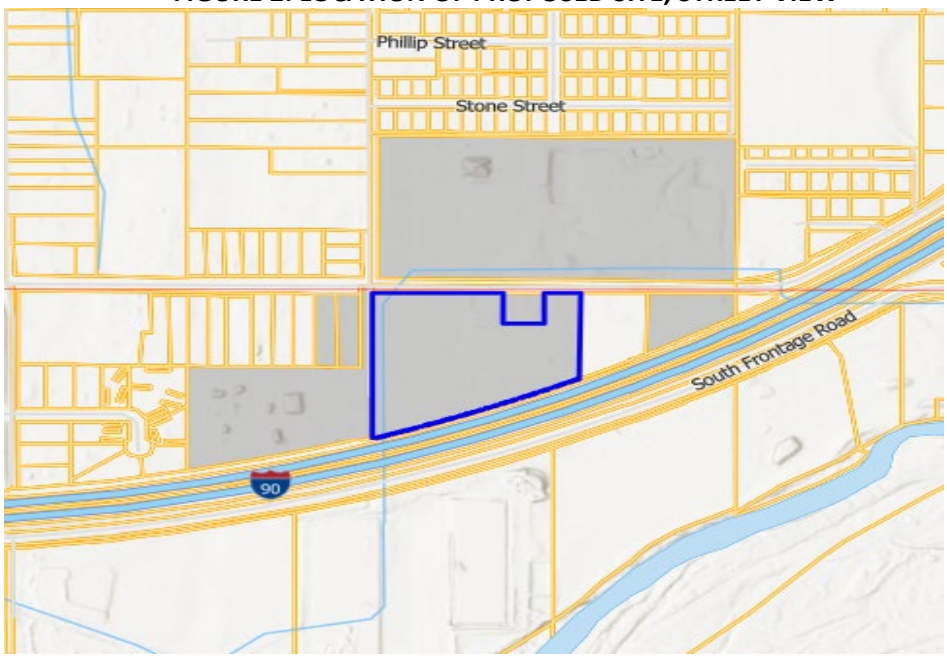
DEQ's purpose in conducting this environmental review is to act upon Yellowstone County Junk Vehicle's application for a license to operate a motor vehicle wrecking facility. DEQ's action on the permit application is governed by Title 75, chapter 10, part 5, Montana Code Annotated (MCA) and the Administrative 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 obtain a new JVCG license for the purpose of collecting and storing junk motor vehicles prior to their disposal.

FIGURE 1: LOCATION OF PROPOSED SITE, AERIAL VIEW

Source: Montana Cadastral

FIGURE 2: LOCATION OF PROPOSED SITE, STREET VIEW



Source: Montana Cadastral

FIGURE 3: PROPOSED SITE

Source: Yellowstone County Junk Vehicle, Motor Vehicle Wrecking Facility License Application

1.5 OTHER GOVERNMENTAL AGENCIES AND PROGRAMS WITH JURSIDICTION:

The proposed project would be located on county 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: Yellowstone County Commissioners.

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.

a. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE

The surficial geology at the proposed facility location consists of alluvial terrace deposits which contain gravel, sand, silt, and clay deposits of the Yellowstone River channels and floodplains.

The soils in the vicinity of the site are classified by the U.S. Natural Resource Conservation Service as Urban Land. The predominant soil types are loam and sandy loam. These soils are excessively drained, 0 to 5 percent slope, and the water table typically begins at a depth of 80 inches for this soil type.

FIGURE 4: SOILS MAP

Direct Impacts

Soil stripping for facility berms and gravel placement for the junk vehicle yard would disrupt developed soil horizons across the 3 acres of surface disturbance.

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 are not drained at the site.

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.

b. WATER QUALITY, QUANTITY, AND DISTRIBUTION

Precipitation in the area has an annual accumulation of approximately 13.66 inches (Billings Chamber of Commerce). The Federal Emergency Management Agency (FEMA) has characterized the area as having minimal flood potential (FEMA 2026). There is one major river and two ditches located within a one-mile radius of the proposed site. These include the Yellowstone River, Grey Eagle Ditch, and the Yegen Drain. At its closest, the Yellowstone River is roughly 0.5 miles to the south of the proposed site. The Grey Eagle Ditch (Irrigation) is located immediately west of the proposed facility. The applicant would not disturb the ditch and would maintain berms along the western and southern perimeters of the 3-acre disturbance area to prevent any surface runoff from the facility. **Figure 1.3** below shows the river and streams within a one-mile radius of the property boundary.

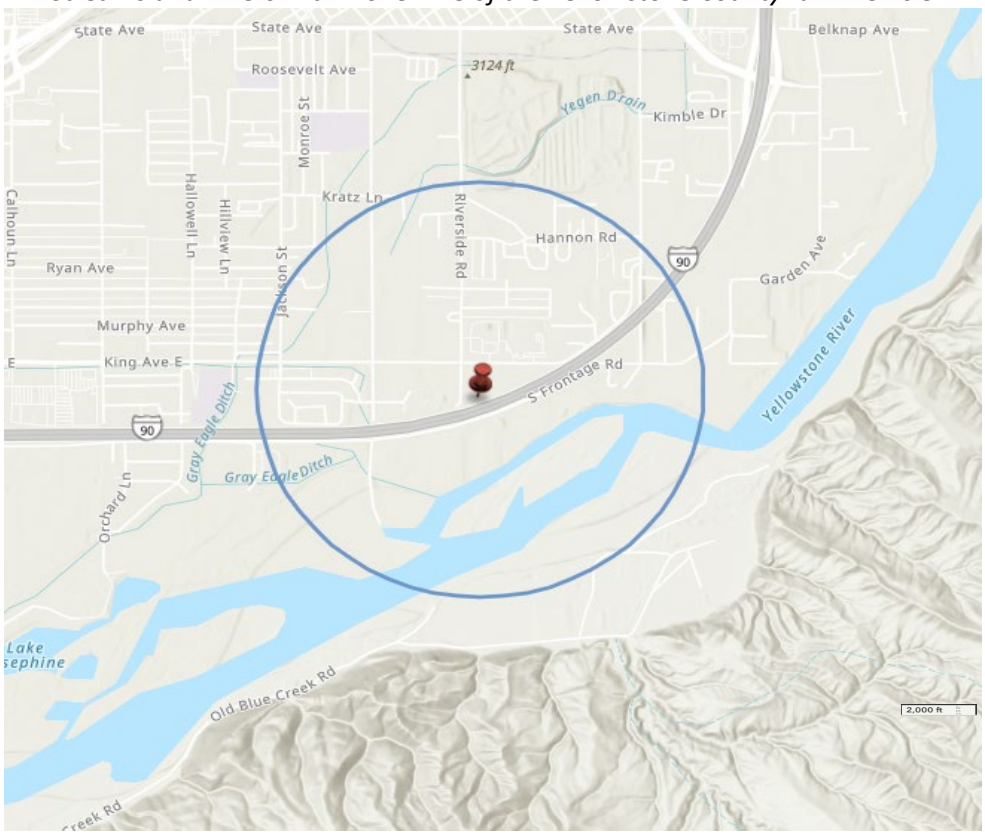
Existing on-site surface flow patterns indicate that any precipitation or surface water would flow toward the center of the 9.1-acre parcel, toward the existing drain field.

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 would be located within one mile of lake, freshwater pond, riverine, freshwater emergent wetland, and riparian forest/shrub habitat, which are located to the south 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 5: SURFACE WATERS

Streams and Rivers within one mile of the Yellowstone County Junk Vehicle



(Source: Discover DEQ Throughout Montana Web Map)

Direct Impacts

During the beginning stages of site preparation, prior to vegetation being established on the perimeter berms, surface water that may leave the site during a heavy storm event could carry sediment.

Waste anti-freeze, gasoline, and lubricating oils contain petroleum distillates, heavy metals, and possibly toxic compounds would be located within the proposed facility. If improperly disposed, these can cause surface and groundwater degradation. The applicant would not remove fluids at this site. Abandoned vehicles are temporarily stored at this facility while any junk vehicles are taken to Pacific Steel for recycling. This proposed JVCG is not expected to have any impact on the quality, quantity, or distribution of the ground water because of the site's operation.

Secondary Impacts

This proposed JVCG is not expected to have any secondary impacts on the quality, quantity, or distribution of and ground or surface water because vehicle fluids will not be removed on site and cars will not be dismantled on site.

Cumulative Impacts

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

c. AIR QUALITY

The Northern Cheyenne Reservation is the closest Class 1 Airshed to the project site, located roughly 72 miles southeast. This project would not be expected to impact this type of airshed due to the distance between the proposed location and the Reservation.

The project area lies within the Billings Sulfur Dioxide Nonattainment Area. However, no special restrictions would be put in place for this facility as the Environmental Protection Agency (EPA) previously found that the area has attained the 2010 SO_2 National Ambient Air Quality Standards (NAAQS). The area continues to attain the NAAQS as a result of the permanent and enforceable shutdown of the PPL Corette facility, whose emissions in 2009–2011 had been responsible for the area not previously meeting the NAAQS.

Direct Impacts

Fugitive dust could be generated from site preparation activities such as earth work. However, these impacts would be expected to last only for the duration of construction. Automotive fluids and refrigerants would not be removed from junk vehicles at the site. Therefore, the impact on air quality is expected to be negligible.

Secondary Impacts

No secondary impacts to air quality would be expected.

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. There are no expected cumulative impacts from the removal of fluids or freon as nether would occur at the proposed facility.

d. 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:

- 37% Human Land Use
- 23% Wetland and Riparian Systems
- 14% Grassland Systems
- 13% Sparse and Barren Systems
- 9% Shrubland, Steppe and Savanah Systems
- 3% Recently Disturbed or Modified
- <1% Forest and Woodland Systems

Direct Impacts

This wrecking facility is surrounded by industrial and commercial areas. The impacts caused by

the establishment of the wrecking facility is not expected to further impact the area's ecosystem as it is in a previously developed area near a major highway. The vegetation cover as described above would be removed or disturbed within the 3 acres of surface disturbance proposed. During construction this grass layer would be removed and replaced with gravel. This gravel lot would remain as a permanent feature.

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 Yellowstone County Weed Department.

Cumulative Impacts

Cumulative impacts on vegetation cover, quantity, and quality from the proposed action could add to existing impacts from existing roads, residential neighborhoods, and industrial and commercial areas.

e. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS

The proposed site is in a prairie and grassland habitat. The site would be located in an already developed and disturbed urban area in Billings, 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, Little Brown Myotis, Silver-haired Bat, Bairds Sparrow, Bobolink, Brewer's Sparrow, Cassin's Finch, Evening Grosbeak, Great Blue Heron, Lewis;s Woodpecker, Loggerhead Shrike, Mountain Plover, Pinyon Jay, Red-headed Woodpecker, Sage Thrasher, Spague's Pipit, Verry, Greater Short0horned Lizard, Plains Hog-nosed Snake, Snapping Turtle, Spiny Softshell, Western Milksnake.

The proposed facility area is located near an urban area with historical and ongoing industrial, commercial, and residential disturbance. The proposed facility would occur entirely on previously disturbed lands owned by the county. Displaced wildlife could find other suitable habitats in any surrounding undeveloped areas. The proposed facility 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

Impacts to terrestrial, avian, and aquatic life from construction or 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, mining, and residential activities in the area.

f. HISTORICAL AND ARCHAEOLOGICAL SITES

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 feels that as long as there would be no disturbance or alteration to structures over fifty years of age, SHPO feels that there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, feels 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, it was concluded that 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.

g. AESTHETICS

The proposed facility would be located on a 9.1-acre county-owned parcel that would be visible from King Ave E, Riverside Rd, and US Interstate 90. As required by law, all junk vehicles must be shielded from public view. MCA, 75-10-501(10) defines Public View as “any point six feet above the surface of the center of any public road from which the wrecking facility and junk vehicles can be seen.” The applicant has proposed the use of berms for visual shielding along the boundary of the 3-acre disturbance area.

The Yellowstone County Junk Vehicle Program would operate the proposed JVCG Monday through Friday, 7 am to 5 pm. The applicant did not state whether portable light towers would be utilized at the facility during times of low natural light.

Noise associated with equipment operation in the proposed facility area may be heard by receptors located in an area where sound related to the project has not been fully diminished by distance, berms or another sound dampening feature.

Direct Impacts

The proposed project could be visible to or heard by the populated surrounding area and to receptors located at observation points that are unobstructed by topography or constructed berms. Aesthetic impacts would be minimized by the construction of berms as required by law. Noise associated with the project could be heard where sound related to the project has not been fully diminished by distance or another sound-dampening feature such as berms.

Secondary Impacts
No secondary impacts to area aesthetics would be expected from the proposed facility.

Cumulative Impacts
Impacts to aesthetics would add to impacts from nearby agricultural, industrial, residential, and highway activities.

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

No unusual demands on land, water, air, or energy are anticipated from the proposed JVCG. Examples of unusual demands, which are not anticipated from this proposed JVCG, 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 JVCG. 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.

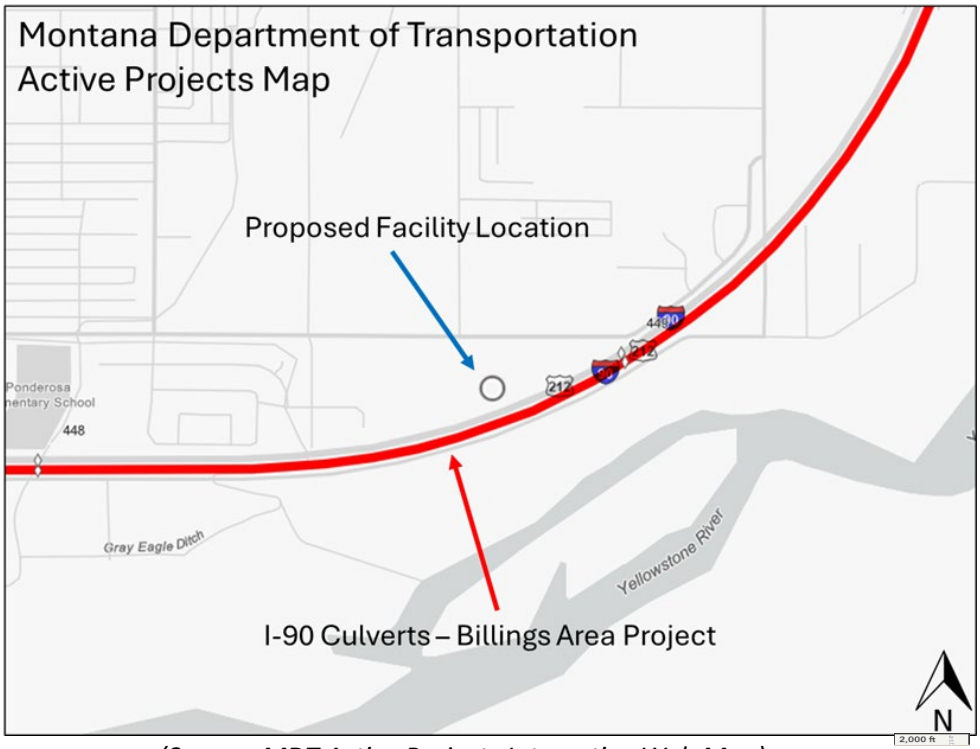
i. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES

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 Billings, 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.

One MDT reconstruction project was identified near the proposed project area. The I-90 Culverts – Billings Area project (10427000) is in design and construction is anticipated by MDT for the Calendar Year 2029. This project will repair 9 and replace 3 existing deteriorated culverts in Big Horn, Stillwater and Yellowstone Counties. The culverts are located under Interstate 90 between Columbus and Lodge Grass. In the three locations where culverts have been determined to need replacement, crossovers will be constructed. However, DEQ does not anticipate that the roadway project would experience

direct interference or resource conflicts from the proposed action.

FIGURE 6: 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.

j. 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. The Yellowstone County Code Enforcement Department 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.

k. INDUSTRIAL, COMMERCIAL, AND AGRICULTURAL ACTIVITIES AND PRODUCTION
The proposed action would occur on land that has been impacted by previous agricultural activities. The proposed facility area has not been utilized to store junk vehicles in the past.

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.

l. 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.

m. LOCAL AND STATE TAX BASE AND TAX REVENUES

The proposed action would have a limited to no increase in tax revenue due to the tax-exempt status of Yellowstone County

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. However, due to the limited employment opportunities associated with the facility, only minimal tax revenue 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 Billings, MT area, and no notable cumulative impacts on local or state tax revenues are expected from the proposed action.

n. DEMAND FOR GOVERNMENT SERVICES

The proposed 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 Billings Sheriff's Department would likely provide some law enforcement presence throughout Billings, including around the project area. Emergency Medical Services would be based at Billings Clinic Hospital, located approximately 3.2 miles to the north of the project area or Intermountain Health St. Vincent Regional Hospital located approximately 3.6 miles to the north 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.

o. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS

The proposed JVCG would occur on county-owned lands within Yellowstone County. The establishment of a JVCG at this location does not conflict with any existing zoning ordinances, as certified by Anna Vickers, Planning Division Manager of Yellowstone County/City of Billings. 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 Yellowstone 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:

- 2008 Yellowstone County/City of Billings Growth Policy
- 2016 Billings Growth Policy
- Yellowstone River Basin Water Plan

None of the above listed policies or plans would impact the issuance of a JVCG 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 county-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.

p. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES

The proposed exploration activities would occur on county-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.

q. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING

Billings is a town in Yellowstone County, MT, and had a population of approximately 117,116 people as of the 2020 census conducted by the United States Census Bureau. Yellowstone County had a population of approximately 164,731 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.

r. 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 JVCG 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.

s. 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 is currently located on land in agricultural use and several junk motor vehicle facilities exist in the surrounding area. The nearest junk vehicle facility would be located roughly 1 mile to the northwest of the proposed facility on Orchard Lane.

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.

t. PRIVATE PROPERTY IMPACTS

The proposed project would take place on county 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.

u. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES

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

v. GREENHOUSE GAS ANALYSIS

DEQ is required to evaluate greenhouse gas (GHG) emissions for statutorily defined fossil fuel activity. 2025 Mont. Laws ch. 348, § 1. However, junk motor vehicle related activities are excluded from the definition of fossil fuel activities and therefore a GHG assessment is not mandatory. Id., § 4(7)(b)(iii). 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 JVCG 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 Yellowstone County

Junk Vehicle 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.

- Yellowstone 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 3 acres, all on county-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 Table 1. 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 impacts to geology and soils through removal of soils and leveling of the ground surface, although limited to the facility area. BMPs to mitigate erosion, sediment movement, and water resource impacts include the construction of berms along the perimeter of the 3-acre disturbance area. Weed control would be implemented consistent with Yellowstone 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 vegetation would occur as soil is stripped at the site. Weed control would occur throughout the life of the project and meet Yellowstone County Weed Department standards.

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

Unique, endangered, fragile, or limited environmental resources have been evaluated. There are no unique or known endangered fragile resources in the project area. SHPO feels that as long as there would be no disturbance or alteration to structures over fifty years of age, SHPO feels that

there would be no cultural or historic properties affected by this undertaking. SHPO, therefore, feels 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 berms for visual shielding along the boundary of the 3-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. Truck traffic from the proposed project would contribute to the cumulative impacts to traffic in the city of Billings, 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, neighborhood character, 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. JVCG-0084, 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 Yellowstone County Commissioners and adjoining property owners about the application for a MVWF license at 3246 King Ave, Billings, Montana. The public can submit comments regarding this EA to: DEQJunkVehicleProgram@mt.gov. The comment period ends on **April 28, 2026**

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.

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6. REFERENCES

Administrative Rules of Montana
https://rules.mt.gov/

Billings Chamber of Commerce
https://www.billingschamber.com/relocate-to-billings/billings/environment/

Billings Growth Policy, 2016
https://billingsmt.gov/DocumentCenter/View/33048/2016-City-of-Billings-Growth-Policy---adopted?bidId=

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Montana Department of Transportation, Active Projects Map, 2026
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Montana DEQ's GIS Portal
https://gis.mtdeq.us/portal/apps/mapviewer/index.html

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http://mtnhp.org/default.asp

MT Sage Grouse Habitat Conservation Program, 2023
https://sagegrouse.mt.gov/ProgramMap

Montana Tech of the University of Montana, Montana Bureau of Mines and Geology (MBMG), Ground Water Information Center http://mbmggwic.mtech.edu/

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https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

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https://geodata.bts.gov/datasets/usdot::nonattainment-area-sulfur-dioxide-so2-2010-standard/explore?location=45.800286%2C-108.525899%2C11

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https://www.census.gov/quickfacts/fact/table/yellowstonecountymontana/PST045224

Yellowstone River Basin Water Plan, 2014
https://dnrc.mt.gov/_docs/water/Hydro_science_data/appendix_a_yellowstone_basin_planning_methodology.pdf