

FINAL

ENVIRONMENTAL ASSESSMENT

Freedom's Path at Fort Harrison Project

Prepared for:

**U.S. Department of Veterans Affairs
810 Vermont Ave NW
Washington, D.C. 20420**



Prepared by:

**WESTECH Environmental Services, Inc.
P.O. Box 6045
Helena, MT 59604**



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TABLE OF CONTENTS

LIST OF ACRONYMS AND ABBREVIATIONS	iv
EXECUTIVE SUMMARY	vi
1.0 INTRODUCTION	1
1.1 Project Background	1
1.2 Purpose and Need	3
2.0 PROPOSED ACTION AND ALTERNATIVES	3
2.1 Proposed Action	4
2.2 No Action Alternative	4
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS	4
3.1 Aesthetics	5
3.1.1 Proposed Action	5
3.1.2 No Action Alternative	5
3.2 Air Quality	5
3.2.1 Proposed Action	6
3.2.2 No Action Alternative	6
3.3 Noise	6
3.3.1 Proposed Action	7
3.3.2 No Action Alternative	7
3.4 Hydrology and Water Quality	7
3.4.1 Proposed Action	8
3.4.2 No Action Alternative	8
3.5 Geology and Soils	8
3.5.1 Proposed Action	9
3.5.2 No Action Alternative	10
3.6 Wildlife and Habitat	10
3.6.1 Proposed Action	11
3.6.2 No Action Alternative	11
3.7 Wetlands and Floodplains	11
3.7.1 Proposed Action	12
3.7.2 No Action Alternative	12
3.8 Cultural Resources	13
3.8.1 Proposed Action	13
3.8.2 No Action Alternative	15
3.9 Land Use	15
3.9.1 Proposed Action	16
3.9.2 No Action Alternative	17

TABLE OF CONTENTS

(Continued)

3.10	Socioeconomics	17
	3.10.1 Proposed Action.....	19
	3.10.2 No Action Alternative	20
3.11	Community Services.....	20
	3.11.1 Proposed Action.....	20
	3.11.2 No Action Alternative	20
3.12	Transportation and Parking	20
	3.12.1 Proposed Action.....	21
	3.12.2 No Action Alternative	21
3.13	Utilities	22
	3.13.1 Proposed Action.....	22
	3.13.2 No Action Alternative	22
3.14	Solid and Hazardous Materials	22
	3.14.1 Proposed Action.....	23
	3.14.2 No Action Alternative	24
3.15	Environmental Justice	24
	3.15.1 Proposed Action.....	25
	3.15.2 No Action Alternative	25
3.16	Potential for Generating Substantial Controversy.....	25
3.17	Cumulative Impacts	26
4.0	PUBLIC INVOLVEMENT	26
5.0	MITIGATION	26
6.0	CONCLUSIONS	31
7.0	LIST OF PREPARERS	32
8.0	REFERENCES CITED.....	33

APPENDICES

Appendix A – Cultural Resources Construction Monitoring Plan
Appendix B – Agency Correspondence

FIGURES

Figure 1 – Project Location	35
Figure 2 – Project Layout and Features	36
Figure 3 – Water Resources and Floodplain Map.....	37
Figure 4 – Former Historic Structures.....	38
Figure 5 – Land Use	39

TABLE OF CONTENTS
(Continued)

TABLES

Table 1-1 Historic Buildings Proposed for Renovation 2

Table 3-1 Percent of Total Earnings in Basic Industries - Lewis and Clark County, 2014-2016.... 18

Table 5-1 Mitigation Measures 27

Table 7-1 List of Preparers 32

LIST OF ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ACP	Asbestos Control Program
ACUB	Army Compatible Use Buffer
ADA	Americans with Disabilities Act
ACM	Asbestos Containing Material
APE	Area of Potential Effect
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
dB	decibels
DEQ	Montana Department of Environmental Quality
DLI	Department of Labor and Industry
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
EUL	Enhanced Use Lease
f/cc	Fibers per cubic centimeter of air
FEMA	Federal Emergency Management Agency
FHTA	Fort Harrison Training Area
FHVH	Fort Harrison Veterans' Hospital
FONSI	Finding of No Significant Impact
HUD	Department of Housing and Urban Development
HWH	Hazardous Waste Handler
LEED	Leadership in Energy and Environmental Design
MBTA	Migratory Bird Treaty Act
MSA	Micropolitan Statistical Area
MTARNG	Montana Army National Guard
MTSHPO	Montana State Historic Preservation Office
NAAQS	National Ambient Air Quality Standards
NCO	Non-Commissioned Officers
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
OSHA	Occupational Safety and Health Administration
PCI	Per capita income
PEL	Permissible exposure limit
PM _{2.5}	Fine particulate matter 2.5 microns or less in diameter

LIST OF ACRONYMS AND ABBREVIATIONS
(Continued)

PM ₁₀	Fine particulate matter 10 microns or less in diameter
PPLT	Prickly Pear Land Trust
RCRA	Resource Conservation and Recovery Act
ROI	Region of Influence
SIP	State Implementation Plan
SWPPP	Storm Water Pollution Prevention Plan
USCB	United States Census Bureau
USFWS	United State Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs
VAMC	Department of Veterans Affairs Medical Center
VASH	Veterans Affairs Supportive Housing

EXECUTIVE SUMMARY

The U.S. Department of Veterans Affairs (VA) is pursuing the development of the Freedom's Path at Fort Harrison Project at the Fort Harrison VA Medical Center (Fort Harrison VAMC) near Helena, Montana as part of the Enhanced Use Lease (EUL) program. The goal of the EUL program is to reduce veteran homelessness while strengthening management of the VA's real estate assets.

The Project is located on the west side of the Fort Harrison VAMC campus about 3.5 miles northwest of the City of Helena. Originally established as a military post in 1892, the land upon which the Fort Harrison VAMC resides was transferred from the U.S. Army to the U.S. Public Health Service in 1919, and then to the VA in 1922 for development as a medical center. Many of the original buildings are still present, and in 2016, the Fort Harrison Veterans' Hospital Historic District (FHVH Historic District 24LC0123) was created, nominated, and placed on the National Register of Historic Places (NRHP).

The Project site encompasses approximately 6 acres of land within the FHVH Historic District. The Project proposes to renovate eleven (11) existing historic buildings and construct two (2) new buildings to create a total of 42 new housing units. In support of the intent of the EUL program, the Project will target homeless, at-risk, and disabled veteran individuals and households. The housing units will include standard and special amenities, as well as convenient access to medical and community services. The anticipated occupancy rate for the Project is approximately 96 individuals. Montana has one of the highest populations of homeless veterans in the U.S., yet limited assistance facilities. A combination of federal and state tax incentives, VA Capital Contribution, federal home loan program assistance, and an EUL land lease would primarily support the Project.

The Project is located within a relatively flat, open landscape amidst maintained lawns and mature shrubs and trees at an elevation of approximately 4,010 feet above mean sea level. The Project is in a predominantly rural setting, with the Fort William H. Harrison military training facility to the north and west, and agricultural land to the east and south.

This Environmental Assessment (EA) was prepared in accordance with the National Environmental Policy Act (NEPA) to analyze the potential environmental effects of the Project, i.e. Proposed Action, on a range of resources. A detailed assessment of the effect of the Proposed Action compared to the option of not developing the Project, i.e. the No Action Alternative, is provided.

The assessment performed in this EA concludes there would be no significant adverse effects to the human or natural environment, provided adherence to the conditions placed on cultural resources as part of the final Section 106 NHPA consultation. Additionally, the implementation of best management practices (BMPs) and regulatory compliance control and mitigation measures will limit impacts during construction. As such, this EA concludes that a Finding of No Significant Impact (FONSI) is appropriate, and an Environmental Impact Statement (EIS) is not warranted.

1.0 INTRODUCTION

The U.S. Department of Veterans Affairs (VA) seeks to develop the Freedom's Path at Fort Harrison Project within the Fort Harrison VA Medical Center (Fort Harrison VAMC) near Helena, Montana as part of the Enhanced Use Lease (EUL) Program. A component of the VA's overall mission, the EUL Program aims to end veteran homelessness and successfully manage the agency's real estate assets. The Freedom's Path at Fort Harrison Project has been identified as a suitable endeavor under the EUL program.

The following Environmental Assessment (EA), in accordance with the National Environmental Policy Act (NEPA), as amended, the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA, and the VA NEPA Interim Guidance (VA 2010), has been prepared to consider the environmental factors pertinent to the development of the Freedom's Path at Fort Harrison Project, and to analyze the significance of the Project's impacts and environmental outcomes.

1.1 Project Background

The Freedom's Path at Fort Harrison Project (Project) is located on VA-owned land approximately 3.5 miles northwest of Helena, Montana in Lewis and Clark County, on the west side of the Fort Harrison VAMC campus (Figure 1). The Project is situated on the west side of the Helena Valley at the base of rolling foothills. Terrain within the vicinity of the Project is flat, and the vegetation consists of maintained lawns and mature shrubs and trees. The United States (U.S.) Geological Survey (USGS) 2001 topographic map for the area shows the elevation of the Project is approximately 4,010 feet above mean sea level.

The Project site, which combines historic redevelopment and new construction, encompasses approximately 6 acres. Veterans Drive, Middle Road, and General Eschenburg Lane form the eastern edge of the Project boundary, and a service road bordering the Project on the west. Figure 2 displays the Project layout and surrounding features.

The current VA hospital and affiliated services are directly east of the Project. The Fort Harrison VAMC is a 34-bed medical-surgical facility offering a range of acute, chronic, and specialized services for veterans. A broad spectrum of specialty medical and psychological care, including a 24-bed inpatient mental health facility, is encompassed within the Fort Harrison VAMC health care system at this location. Fort William Henry Harrison, the military training facility for the Montana Army National Guard (MTARNG), is located directly north of the Project, with associated training grounds to the west.

The Fort Harrison VAMC is situated on the original site of the Fort William Henry Harrison military post, which was designated by Congress in 1892. The campus was transferred to the United States Public Health Service in 1919, and then to the VA in 1922 (National Park Service 2016). The Fort Harrison VAMC was assessed for placement on the National Register of Historic Places (NRHP) as the Fort Harrison Veterans' Hospital Historic District in 2016, and on December 20, 2016, the nomination was confirmed (Federal Register 2016). Each building within the Historic District was assigned an identification number during the nomination process. The Project includes renovating 11 existing, historic buildings and constructing 2 new buildings. The historic buildings are currently vacant and partially used for storage or emergency and facilities management training exercises. Historic renovation will result in a total of 40 units in a 1- or 2-bedroom configuration. One of the new buildings is a duplex that will provide two, 2-bedroom units. The other new building will be a multi-purpose clubhouse and does not contain any residential units. Table 1-1 lists the historic buildings involved in the Project and provides their NRHP building number, historic use, the year of construction, and proposed bedroom layout.

Table 1-1. Historic Buildings Proposed for Renovation

NRHP Building Identification Number	Description and Historic Use	Original Construction Year	Number of Units and Bedroom (BR) Configuration
2	Original 1895 Hospital	1895	(7) – 1 BR
3	Officer's Quarters	1895	(2) – 1 BR, (4) – 2 BR
4	Officer's Quarters	1895	(2) – 1 BR, (4) – 2 BR
5	Officer's Quarters	1895	(2) – 1 BR, (4) – 2 BR
11	Non-Commissioned Officers Quarters	1899	(2) – 1 BR
12	Non-Commissioned Officers Quarters	1895	(2) – 1 BR
13	Non-Commissioned Officers Quarters	1895	(2) – 1 BR
14	Hospital Corps Stewards Quarters	1895	(1) – 2 BR
35	Commanding Officers Quarters	1899	(6) – 1 BR
41	Non-Commissioned Staff Officers Quarters	1905	(1) – 2 BR
42	Non-Commissioned Staff Officers Quarters	1905	(1) – 2 BR
TOTAL			40

Units will include a refrigerator, electric range, microwave oven, dishwasher, carpeting, window blinds, central air conditioning, cable, and a security system. Additional community amenities will include on-site management, a fitness center, clubhouse, community room, library, and laundry. The lower level of Building #2 will provide community space and offices. There will be additional office areas for special needs services.

1.2 Purpose and Need

In 2014, the rate of homeless veterans in Montana was one of the highest in the country, at 63.3% (U.S. Department of Housing and Urban Development [HUD] 2014). Limited homeless shelter and veteran housing options exist in Lewis and Clark County. There is substantial need for the Project.

In support of the intent of the EUL program, the Project will target homeless, at-risk, and disabled veteran individuals and households. Located on the Fort Harrison VAMC, the Project is sited in the best possible location for the population to be served, providing medical, pharmacy, and therapy services on the same campus. Additionally, the location affords an ideal combination of urban and rural settings. The pastoral setting in which the Project is situated should support the health and healing of veterans. Treatment options incorporating non-stressful and supportive environments have been repeatedly demonstrated as complementary approaches to traditional treatment and crucial to the healing process. A former agricultural property directly east of the Fort Harrison VAMC is now owned by a local land trust, and plans to construct hiking paths and improve access to nearby Tenmile Creek are underway. The proximity of the Project to Helena will provide access to broader community programs, services, and amenities that will allow for opportunities for essential services, employment, and reintegration into the civilian community.

The nature of the Project's design, which blends renovated and new units with an array of housing types and sizes, provides breadth and flexibility to serve veteran housing needs across family sizes and life situations. This diversity is desirable for meeting the housing needs of the veteran population in a low density, attractive community. The renovation of the 11 historic buildings will provide a preservation element to the Project, which is supported by the VA and historic preservation agencies and organizations.

The location of the Project is a direct function of the VA's initiative to reduce veteran homelessness and, as such, has strong support within the VA community. This is demonstrated by the land lease option provided by the EUL program and a significant VA Capital Contribution.

2.0 PROPOSED ACTION AND ALTERNATIVES

This section presents the criteria involved in determining the Proposed Action and any alternatives that were considered. Alternatives must be evaluated in the EA per NEPA, CEQ, and VA NEPA regulations, including an explanation for any alternatives that were eliminated from consideration, if applicable.

The EUL program is one of several of housing assistance programs provided by the VA. Underutilized real estate within VA control is out-leased to the private sector for the purpose of developing supportive housing and services for homeless or at-risk veterans and their families. EUL projects provide safe, affordable housing for veterans near VA health care providers. Hence, these EUL program objectives constitute the primary criteria for the selection of the Project site: 1) the presence of underused VA property in proximity to a VA medical facility, and 2) a site located in an area with a considerable at-risk veteran population. Outpatient and community-based outpatient clinics extend limited VA services to veterans in Montana cities; however, the Fort Harrison VAMC is the anchor of the VA health care system in Montana and serves as the main facility for veteran care in the state. For these reasons, no alternative sites were considered for the Project.

The Proposed Action and No Action Alternative are included for detailed study in this EA. The Proposed Action is the preferred alternative.

2.1 Proposed Action

The Proposed Action is the renovation of 11 historic buildings and construction of 2 new buildings to create a total of 42 new residences for homeless or at-risk veterans at the Fort Harrison VAMC near Helena, Montana.

2.2 No Action Alternative

Under this alternative, the Proposed Action would not be implemented. The VA would not lease the property for development, and the housing for unsheltered or homeless veterans would not be constructed. The existing burden on the limited homeless shelters or housing options in Lewis and Clark County would not be alleviated. The site would remain under VA ownership and undeveloped, which would not support the asset management objective. The historic buildings would not be remodeled, leaving them vacant with limited use and susceptible to additional deterioration. This would not satisfy the Purpose and Need of the Project.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

This section presents a detailed assessment of the effect of the Proposed Action for each environmental resource. For each resource, the Proposed Action is compared to the No Action Alternative.

3.1 AESTHETICS

For the purposes of this EA, aesthetics is defined as human perceptions or judgements concerning the beauty of the environment (i.e., visual quality). The threshold of significance to visual quality is defined through Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires Federal agencies to determine effects on historic properties and provide the Advisory Council on Historic Preservation (ACHP) the ability to comment on the Proposed Action and possible identified effects, based on ACHP regulations. The significance of potential impacts to aesthetics and visual resources is based on the level of sensitivity in the areas affected by the Proposed Action.

3.1.1 Proposed Action

The Fort Harrison VAMC campus comprises a mixture of historic (ca. late 1800s) and modern (ca. 1970s or more recent) buildings in a park-like setting on maintained, landscaped grounds. The buildings in the immediate area of the Proposed Action are historic, separated by open spaces where the construction of new buildings would occur. Renovation of existing historic structures would not be expected to substantially alter their external appearance. There are no other modern structures in the immediate area of the Proposed Action. The new clubhouse and duplex building have been designed with the historic district in mind, with a focus on blending in with the constructed surroundings. The new buildings would vary from about 500 feet to about 750 feet from existing modern buildings. However, some existing modern buildings and historic structures outside the immediate area of the Proposed Action are within 50 feet of each other. Consequently the Proposed Action would not be expected to substantially change the overall aesthetics of the Fort Harrison VAMC campus.

3.1.2 No Action Alternative

If the Proposed Action is not approved, existing aesthetics would not be altered and, therefore, there would be no effects to aesthetics.

3.2 AIR QUALITY

The U.S. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) for air pollutants as required under the Clean Air Act (CAA). The EPA requires each state government to adopt a State Implementation Plan (SIP) that prescribes control strategies to reduce air pollution. The six pollutants designated by the EPA as criteria contaminants that require special measures to limit their presence in the air are: sulfur dioxide, nitrogen dioxide, ozone, carbon monoxide, lead, and particulate matter (fine particles less than 2.5 microns in

size as PM_{2.5} and coarser particles up to 10 microns in size as PM₁₀). The nearest nonattainment area in Lewis and Clark County is the East Helena Lead Nonattainment Area (Montana Department of Environmental Quality [DEQ] 2017a), which is 10 miles east, and downwind, of the Project area.

3.2.1 Proposed Action

New construction and existing facility renovation may cause temporary, minor negative impacts to local air quality. Soil disturbance during new construction at the Project site could temporarily generate fugitive dust, but standard mitigation measures could be implemented to reduce dust, such as regular application of water to exposed soils. There is potential for asbestos to be released into the atmosphere during renovation; however, an approved asbestos abatement and encapsulation plan would be implemented by the building contractor to prevent friable particles from being released. Appropriate VA, EPA, Occupational Safety and Health Administration (OSHA), and other regulatory guidance would be followed during construction. No significant impacts to existing air quality are anticipated as the result of construction, renovation, or operation of the Project.

3.2.2 No Action Alternative

Under the No Action Alternative, existing air quality conditions would not be affected.

3.3 NOISE

Noise is defined as unwanted sound that interferes with normal activities, reducing the quality of the natural environment. Noise is measured in decibels (dB). Noise thresholds, as designated by the OSHA in 29 CFR Part 1910.95 and 1926.52, are 90 dB per an eight hour day. Exposure to impact noise should not exceed 140 dB.

The Project area is representative of a commercial environment with existing noise levels along the roads ranging from 35 to 45 dB. Normal vehicular noise emitters from traffic travelling through the Fort Harrison VAMC complex increases to between 55 to 65 dB during hours when Fort Harrison VAMC staff change shifts and vehicle traffic temporarily increases. The Fort Harrison VAMC provides hospital care and medical services to veterans. Maintaining a serene environment for patients is important. The Fort Harrison VAMC could be defined as a noise sensitive receptor. Noise sensitive receptors are defined as areas where the occupants are more susceptible to the adverse effects of noise exposure. They usually occur within 1,000 feet of the noise source. In addition to the Fort Harrison VAMC, noise sources in the area are predominantly natural (e.g. wind), with occasional incremental noise sources such as aircraft,

road traffic, military training exercises from the adjacent Fort Harrison Training Area (FHTA) (e.g. military helicopters, pistol and machine gun ranges), and the operation of associated hospital building equipment (e.g. heating, ventilation, and air conditioning).

3.3.1 Proposed Action

Noise impacts from the Proposed Action would be intermittent, short-term, and virtually limited to the construction phase of the proposed Project. No special construction activities (e.g. pile driving, blasting) are planned to occur as part of Project construction.

Noise from construction would be directly related to distance to the construction activities. Project-related vehicles and construction equipment would generate noise while in operation during the construction of the Project. The noise would occur usually only during daylight hours, except for some road vehicles which may be travelling over public roads in the minutes or hours preceding dawn and following dusk as workers return to work or lodging. Noise associated with temporary construction activity is exempt from the standards between 6:00 a.m. and 7:00 p.m. Construction workers would be required to adhere to the permissible exposure limits of 90 dB per an eight-hour day. Per OSHA requirements, protection against the effects of noise exposure shall be provided when the sound levels exceed those shown in Table D-2 of CFR 1926.52(a).

The operation of the Proposed Action is not expected to generate noise above the existing noise levels within the Project area. The daytime duration of noise may increase due to increased use of the area and the residents driving vehicles in and out of the area. Therefore, it is not anticipated that noise would have a substantial adverse effect on the surrounding natural and manmade environments.

3.3.2 No Action Alternative

Under the No Action Alternative, the Project as described for the Proposed Action would not be constructed. Therefore, noise emissions would not be increased with the No Action Alternative.

3.4 HYDROLOGY AND WATER QUALITY

The Project is situated in an upland location between the Sevenmile Creek and Tenmile Creek drainages at an elevation of approximately 4,010 feet above sea level. Surface runoff and groundwater in the area generally flow southeasterly to Tenmile Creek and then northeasterly toward Lake Helena (3,650 feet in elevation), which is located approximately 8.5 miles from the

Proposed Action and was created as a byproduct of the construction of Hauser Dam on the Missouri River. Groundwater in the Helena area occurs in bedrock aquifers along the margins of the Helena Valley, and in the Helena Valley Alluvial aquifer within the valley (Briar & Madison, 1992). No waterways, wetlands or wells are located within the proposed footprint of the Project.

3.4.1 Proposed Action

Construction, renovation, and operation of the Proposed Action would occur on a previously disturbed and partially developed site occupied by buildings, lawn, and parking areas. New construction and renovation within the 6-acre proposed Project site would result in a maximum of approximately 0.5 acres of soil disturbance, including the new buildings (0.12 acres), parking areas (0.25 acres) and sidewalks (approximately 0.10 acres). Permanent water and sewer lines and storm water drainage would connect to the existing systems on the Fort Harrison VAMC campus. No groundwater pumping or discharge would be anticipated during construction, renovation, or operation phases. Where renovation of existing buildings is proposed, the existing landscape would be left undisturbed. Upon completion of construction, disturbed areas would be landscaped and seeded or sodded to match the remainder of the site.

Following initial soil disturbance associated with site grading or other construction activities, runoff from the Project could contribute silt and pollutants to the storm drain system. The potential for temporary, short-term impacts would be minimized by application of construction BMPs as specified in the Project Storm Water Pollution Prevention Plan (SWPPP). The construction and operation of the Proposed Action are not anticipated to have a significant adverse effect on hydrologic resources or water quality.

3.4.2 No Action Alternative

Under the No Action Alternative, no construction or development by the VA would occur and therefore, no impacts to hydrology or water quality would occur.

3.5 GEOLOGY AND SOILS

Geology within the Project location is mapped as a combination of Quaternary age alluvium and substantially older Middle-Proterozoic meta-argillite of the Empire shale unit (Raines and Johnson 1995). The area beneath Buildings 41, 11-14, and 42 is mapped as alluvium; the remaining areas are underlain by the Empire shale. Alluvium is typically comprised of several grain size classes, such as silt, sand, and gravel. The alluvium in the area of the Proposed Action also includes terrace deposits and glacial drift (sediments and boulders transported, and

directly deposited, by glacial ice or meltwater) from the Pleistocene epoch (Ross et al. 1955). The Empire shale is a dense, green, laminated argillite (shale) with some red coloration that has been hardened through partial metamorphism. A secondary rock type within this unit is quartzite, which is metamorphosed sandstone (Ross et al 1955). Based on the sources reviewed, the Project is not located along any faults, but does lie within the Intermountain Seismic Belt, which is a belt of seismicity in the western mountainous region of Montana extending from the Flathead Lake region in the northwest corner of the state to the Yellowstone National Park region. The epicenter of the series of earthquakes that severely damaged buildings in Helena and the surrounding area in 1935, including the Fort Harrison VAMC, was determined to be two miles north of Helena along a northwest-trending fault (Scott 1935). A recent 5.8 magnitude earthquake, followed by weeks of small magnitude aftershocks, occurred on July 6, 2017 approximately 30 miles northwest of Helena. No damage was reported to structures.

Soils in the Project area are mapped as primarily Sappington-Musselshell gravelly loams, with a small component of the Musselshell-Crago gravelly and sandy loam at the south end of the Project. The soils are derived from coarse-loamy alluvium and are well drained and moderately deep. The soils are not classified as prime farmland (land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and that is available for these uses), and therefore does not fall under the federal Farmland Protection Policy Act (Natural Resources Conservation Service [NRCS] 2017). There is no soil contamination present on the Project, or in the immediate vicinity (WESTECH 2017).

3.5.1 Proposed Action

The Proposed Action is situated on ground that was previously disturbed and manipulated. Additionally, the Project would not impact mineral development since there are no known economic mineral deposits or oil and gas reserves in the vicinity.

The Proposed Action may result in minor and temporary soil erosion and sedimentation impacts during site development and construction activities. Construction preparation actions such as clearing, grading, and removing vegetation would result in disturbance and compaction of the soil. Vegetation removal would consist of eliminating trees and grass within the new construction footprint and a limited number of problematic trees that put existing structures at risk. Otherwise vegetation would remain largely intact. Disturbed soil may be at greater risk of wind and water erosion, which could increase the sediment load of surface runoff to adjacent properties and the municipal storm water system. However, the implementation of construction BMPs and adherence to the Project's SWPPP, or other applicable water quality

permits would mitigate the potential for adverse effects from soil erosion. Immediate seeding and revegetation of disturbed areas would minimize potential impacts to soil. The construction and operation of the Proposed Action are not anticipated to have a significant adverse effect on soils or geology.

3.5.2 No Action Alternative

Under the No Action Alternative, the Project would not be developed, and no construction or building renovation would occur. Therefore, there would be no impact to geology or soils.

3.6 WILDLIFE AND HABITAT

The Fort Harrison VAMC is a developed facility where native habitats largely have been replaced by a landscaped environment consisting of maintained lawn and mixed ornamental trees and shrubs between the existing buildings. The primary developed portion of the Fort Harrison complex is located immediately to the north and east of the proposed Project site and is comprised of buildings, streets, parking areas, and training facilities. A large field training area associated with the FHTA is located to the west and south of the proposed Project. The area is comprised of flat to hilly rangeland primarily vegetated with grasses and scattered patches of juniper, sagebrush, and bitterbrush, and includes various scattered structures, ranges, and roads. Soils and contours on the training area are highly disturbed due to many years of troop training and off-road equipment activities. An approximately 10-acre cemetery, also consisting of maintained lawn and a mix of ornamental trees and shrubs, is located approximately 0.15 mile southeast of the proposed Project.

The proposed Project site is not critical habitat for any U.S. Fish and Wildlife Service (USFWS) Threatened, Endangered, Proposed, or Candidate species. The adjacent grasslands contain potential habitat for Brewer's sparrow (*Spizella breweri*), McCown's longspur (*Rhynchophanes mccownii*), and long-billed curlew (*Numenius americanus*), all Montana Species of Concern, although it is unlikely they would utilize areas disturbed by Project activities.

Of the many bird species protected by the Migratory Bird Treaty Act (MBTA), the species likely to utilize the existing Fort Harrison VAMC and residential habitat would seasonally include common songbirds such as American robin (*Turdus migratorius*), mourning dove (*Zenaidura macroura*), house finch (*Haemorhous mexicanus*), northern flicker (*Colaptes auratus*) and black-capped chickadee (*Poecile atricapillus*), as well common raven (*Corvus corax*). It is possible that raptors such as red-tailed hawk (*Buteo jamaicensis*), sharp-shinned hawk (*Accipiter striatus*), or great horned owl (*Bubo virginianus*) would temporarily utilize trees within the Project area, but due to the existing high level of human activity, it is unlikely they would nest on the site.

Resident mammals observed in or near the Project site include Mountain cottontail (*Sylvilagus nuttalli*), white-tailed jackrabbit (*Lepus townsendii*), mule deer (*Odocoileus hemionus*), and pronghorn (*Antilocapra americana*). Mule deer are year-round residents on Fort Harrison and the Fort Harrison VAMC property, and are frequently observed bedded or grazing on lawns within the facility. Although also present on Fort Harrison, pronghorn are generally less tolerant of human activity than mule deer and less likely to be observed within the Project site.

3.6.1 Proposed Action

Of the 6 acres proposed for development, approximately 0.5 acres of soil and landscaping disturbance would occur on the Project during construction. Where possible, existing lawn, shrubs, and trees would be left undisturbed. Upon Project completion, disturbed areas would be reclaimed to match the undisturbed portion of the Project site. The construction and maintenance of the Project would have no significant impacts to species of concern and create minimal disturbance or impacts to existing wildlife resources.

Construction noise would be noticeable to wildlife species that occur within the vicinity of the proposed Project. The noise would not be sufficiently loud to have serious impacts upon any species other than possibly discouraging occupation of the Project area during active construction. However, the size of the surrounding area of similar land use and habitat gives wildlife ample area to migrate into and out of the Project area during construction.

3.6.2 No Action Alternative

There would be no impacts to wildlife under the No Action Alternative.

3.7 WETLANDS AND FLOODPLAINS

According to National Wetland Inventory (NWI) mapping (Figure 3), and field verification, there are no wetlands or waterways located within the proposed Project footprint.

The following waterways and wetlands are located near the site:

- An intermittent west-east drainage is located within 60 feet north and west of the buildings to be renovated on Middle Road (Buildings 11-14, 41, & 42) just outside of the Proposed Action. NWI maps indicate the drainage terminates in agricultural lands just east of Williams Street, the east boundary of the FHTA. Wetlands classified as PEM1A and PEM1B are located within the drainage approximately 0.15 miles up-gradient from the Project site.

- An intermittent west-east drainage is located about 300 feet to the south of the Project area and ends just east of Williams Street. The nearest wetland (classified as PEM1A) associated with the drainage is located approximately 0.75 mile up-gradient from the Project site.

Other water features in the general vicinity of the Project include:

- Intermittent Cherry Creek is located approximately 0.5 mile to the north of the proposed Project site. Bed and banks become undefined just north of the main Fort Harrison complex.
- An unnamed private pond and Spring Meadow Lake are located 1.15 and 1.25 miles, respectively, to the southeast. Two seasonally flooded, excavated basins on private lands are located 0.6 mile to the east and 0.9 mile to the southeast.
- Sevenmile Creek and Tenmile Creek run generally west to east and are located approximately 1.3 miles northeast and 1 mile south of the Project site, respectively.

According to floodplain mapping developed by the Federal Emergency Management Agency (FEMA), the Fort Harrison VAMC site is located above and outside of the FEMA-designated 100-year and 500-year floodplains and is not regulated under Executive Order 11988 - Floodplain Management (FEMA 2017).

3.7.1 Proposed Action

The Proposed Action, including construction, renovation, and operation of the Project at the Fort Harrison VAMC would result in approximately 0.5 acres of temporary soil disturbance, none of which would occur within wetlands, waterways, or a floodplain. No surface waters are located within the Project footprint, but two intermittent drainages are located within 300 feet of the Project construction area. SWPPP measures would be implemented as required and maintained throughout construction to minimize the potential for adverse effects on off-site wetlands and waterways. Therefore, the Proposed Action would not significantly affect wetlands and floodplains.

3.7.2 No Action Alternative

Under the No Action Alternative, the Project would not be developed and there would be no effects to wetlands, waterways, or floodplains.

3.8 CULTURAL RESOURCES

The Project is located within the NRHP-listed Fort Harrison Veterans' Hospital Historic District (FHVH Historic District, 24LC0123) in Helena, Montana.

Fort William Henry Harrison was established by Congressional order as a military post in 1892. Twenty-one of the 40 features on the campus were constructed between 1894 and 1909. In 1919, the U.S. Army transferred the facility to the Public Health Service and, in 1922, the post transitioned to the VA. Of the 40 features located on the Fort Harrison VAMC campus, 34 features are of historic age and 31 contribute to the FHVH Historic District, including all 11 of the buildings selected for renovation under the Project (#2-5, #35, #11-14, #41-42). Nine resources do not contribute to the FHVH Historic District for several reasons, including: the buildings they were associated with no longer exist, they have been substantially remodeled, they do not add materially to the understanding of Fort Harrison's history and significance, or do not meet the National Register age criteria (Axline 2016).

All of the contributing buildings within the FHVH Historic District boundary share a similarity of architectural design, massing, and detailing. In November 1894, while many of the buildings were under construction, the Helena Independent described the post as "substantially built," with the exteriors of the individual buildings "plain, but substantial looking." What the buildings may lack in architectural ornamentation is more than made up by the sturdy appearance of the buildings associated with the post when it functioned as a military facility. Many have rough-faced stone foundations built of stone quarried in the Helena, Great Falls, Ulm, and Billings areas. Many feature granite window and door sills, decorative segmentally arched brick window and door lintels, pedimented gables, and many have open-air porches (Axline 2016).

The Montana State Veterans Cemetery is not included within the FHVH Historic District. The cemetery, while on the Fort Harrison VAMC campus, is not administered by the VA. Instead, it is administered by Montana Department of Military Affairs. The Montana State Legislature established the cemetery at the Fort Harrison VAMC in 1985 and the first burial occurred in September 1987 (Axline 2016).

3.8.1 Proposed Action

The Proposed Action, including construction, renovation and operation of the Project at the Fort Harrison VAMC could potentially impact known cultural resources, namely the NRHP-listed FHVH Historic District (24LC0123). To determine Project effects, an archaeological inventory was undertaken in accordance with the regulations (36 CFR Part 800) that implement Section 106 of the NHPA of 1966, as amended, to meet all state and federal guidelines (Herbel 2017).

No relevant surficial cultural resources were identified during pedestrian inventory of the Project Area of Potential Effects (APE). A 1912 plat map on file at the Fort Harrison VAMC grounds engineering office shows the location of previous buildings located within the Project APE (Herbel 2017). No longer present within the Project APE along General Eschenburg Lane are original Fort William Henry Harrison Buildings 6-8, all of which were “Captain’s Quarters.” It is likely the absence of Buildings 6-8 (also Buildings 25, 26 along General Eschenburg Lane) can be attributed to the 1935 Helena earthquake, after which a total of nine buildings on the grounds were razed (Helena Independent Record, April 5, 1936 Page 4; August 24, 1937, Page 2).

Given the high probability of possibly intact subsurface archaeological remains, archaeological monitoring of ground disturbance associated with the new clubhouse and duplex would be conducted during construction. Specifically, monitoring would be in regards to the position of the new duplex relative to the original Building 6 and its possible subsurface features (Figure 4). Archaeological monitoring would seek to evaluate any cultural resources encountered during construction and evaluate said resources for their potential eligibility in the NRHP. The cultural resources construction monitoring plan is included as Appendix A.

In regards to potential Project effects to architectural resources that comprise the FHVH Historic District (24LC0123), the developer would be required to comply with the Secretary of the Interior’s Standards for Rehabilitation in the preservation and renovation of all 11 historic buildings within the Project, and to maintain ongoing consultation with the Montana State Historic Preservation Office (MTSHPO) throughout the design and development process.

As such, the aforementioned measures constitute the conditions placed on the Proposed Action by the MTSHPO as part of the Section 106 consultation with the VA:

- The developer will rehabilitate the historic buildings within the Project to meet the Secretary of the Interior’s Standards for Rehabilitation. The proposed development plan utilizes both low income and historic tax credits, and thus will be required to meet these standards as a condition for funding.
- The developer will maintain ongoing consultation with the MTSHPO throughout the remainder of the design and development process.
- The developer will implement the monitoring plan for ground disturbing activities associated with construction of the clubhouse, near the site of former Building 6. Any recovered artifact will remain the property of VA.

These conditions ensure the Project will have no adverse effect to cultural resources. A copy of the MTSHPO concurrence letter is included in Appendix B.

3.8.2 No Action Alternative

Under the No Action Alternative, no adverse effects to cultural resources would occur.

3.9 LAND USE

The Proposed Action is located on the west side of the Fort Harrison VAMC on land administered by the VA and covers approximately 6 acres of land. The entire Fort Harrison VAMC campus comprises an area of 95 acres. The Fort Harrison VAMC campus is located within the boundaries of the larger FHTA. The FHTA consists of approximately 6,370 acres within the Helena Valley and is about one mile from the western edge of the City of Helena.

The Project is located in a relatively suburban setting within the Fort Harrison VAMC, consisting largely of manmade features such as buildings, parking lots, roads, and maintained lawns. The majority of vegetation cover at the Project consists of maintained lawns with scattered landscaping trees and shrubs. The Fort Harrison VAMC complex has a separate entrance (Honor Drive) from the FHTA, located approximately one-half mile south of the main gate for the FHTA. The State of Montana Veterans Cemetery is also accessed by the Honor Drive entrance. There are approximately 750 employees working at the VA campus (Lewis and Clark County 2016).

Surrounding Land Use and Ownership

Lands adjacent to the Fort Harrison VAMC are all owned by the U.S. Department of the Army and are part of the larger FHTA. FHTA is the primary training site for MTARNG. Adjacent land south of the Fort Harrison VAMC is owned by the State of Montana and include the State of Montana Veterans Cemetery.

Figure 5 shows publicly owned lands in the vicinity of Fort Harrison. Below is a discussion of land use and ownership in the vicinity of the FHTA and Fort Harrison VAMC, which is excerpted from the Lewis and Clark County Growth Policy Update 2015 Volume 2 (Lewis and Clark County 2016).

North – Directly adjacent to the northern boundary of FHTA, between Barrett Road and Birdseye Road, are large, rural residential lots. West of Chaparral Drive are agricultural tracts. North of Birdseye Road are rural residential lots. Between Birdseye Road and Austin Road is a mix of State Trust land, agricultural land, and rural residential uses. Residential and agricultural land are under private land ownership. The area north of Fort Harrison is designated as “Rural

Growth Area” on Lewis and Clark County’s Growth Policy future land use map (Lewis and Clark County 2016).

East – Immediately east of the main entrance along Williams Street is agricultural land that is privately owned. Prickly Pear Land Trust (PPLT) acquired 558 acres in this area in partnership with Fort Harrison with funding from the Army Compatible Use Buffer (ACUB) program. The land is designated for open space and habitat with a trail system being planned to connect to other regional trails. North of the PPLT parcel is 155 acres of agricultural land. This parcel is designated “Urban Growth Area” on Lewis and Clark County’s Growth Policy future land use map.

Further east between Head Lane and the Helena city limits are Spring Meadow Lake State Park (administered by Montana Fish Wildlife and Parks) and Green Meadow Country Club (privately owned). West of Williams Street, between U.S. Highway 12 and Honor Drive, is a rural – suburban residential subdivision with ½ acre lots. This area is designated as “Urban Growth Area” on Lewis and Clark County’s Growth Policy future land use map.

South – The area between U.S. Highway 12 and Fort Harrison is a mix of rural residential uses and agricultural parcels. Montana State Trust Lands and U.S. Forest Service Lands are present south of Highway 12. Private land south of U.S. Highway 12 is primarily agricultural land. Most of the area south of Fort Harrison is designated as “Rural Growth Area” on Lewis and Clark County’s Growth Policy future land use map but areas near the City of Helena are designated as “Urban Growth Area.”

West - Lands west of Fort Harrison are primarily agricultural lands used for grazing cattle. Further west of the agricultural tracts are lands administered by the U.S. Forest Service. The area west of Fort Harrison is designated as “Rural Growth Area” on Lewis and Clark County’s Growth Policy future land use map.

3.9.1 Proposed Action

The VA is not subject to local zoning requirements. The use of the Project area for veteran housing is consistent with the mission of the VA and the proposed uses of the Fort Harrison VAMC. Therefore, no significant adverse effects to the current land use would be anticipated as a result of the Proposed Action.

3.9.2 No Action Alternative

Under the No Action Alternative, no construction or redevelopment would occur and therefore, no impacts to land use would occur.

3.10 SOCIOECONOMICS

The Project site is located about one mile from the western edge of the City of Helena (Lewis and Clark County). Lewis and Clark County is identified as the region of influence (ROI) for socioeconomic resources including population, employment, income, housing, and schools. Lewis and Clark County is part of the Helena, Montana Micropolitan Statistical Area (MSA). This designation indicates that the area is somewhat self-sufficient regarding its labor force, employment, and retail activities. The Helena MSA as defined by the U.S. Census Bureau (USCB) as an area consisting of two counties in western Montana (Lewis and Clark County and Jefferson County), anchored by the city of Helena.

Data were collected from federal and state government sources, including the USCB; Montana Department of Labor and Industry (DLI); University of Montana's Bureau of Business and Economic Research; and the Lewis and Clark County government.

Population Characteristics

Lewis and Clark County is Montana's sixth most populous county with 63,395 residents according to the 2010 U.S. Census. Helena, the state capitol and the county seat, is the state's sixth largest city, with a population of 28,190 in 2010. In 2015, the population of Lewis and Clark County was estimated at 66,418, a 4.9 percent increase from the population estimated in the 2010 Census. The number of veterans living in the ROI between 2011 and 2015 was estimated at 6,406 (USCB 2017).

Other towns and population centers in Lewis and Clark County include: Augusta, Canyon Creek, East Helena, Fort Harrison, Lincoln, Marysville, and Wolf Creek.

Helena is known for its record of economic stability, due in large part to government employment. Approximately one-third of Helena's workforce is employed in government positions. Helena is also regarded as a trading and transportation hub due to its central location in Montana.

Employment

In 2015, the Fort Harrison VAMC employed 860 full-time personnel (Lewis and Clark County 2016). Employment (the number of jobs) within the ROI increased 1.5 percent from 2013 to 2014, with 25,019 jobs in 2014 (USCB 2017). As Table 3-1 shows, state and federal government accounts for a significant portion of the economic base in Lewis and Clark County (Polzin 2016).

Table 3-1. Percent of Total Earnings in Basic Industries – Lewis and Clark County, 2014-2016

Basic Industry	Earnings (Percent of Total)
Agriculture and Mining	4
Transportation and Information	3
Manufacturing	5
Education, Other	7
Trade Center – Insurance	7
Trade Center – Professional and Technical	6
Federal Government	22
State Government	46

Source: Polzin 2016

Income

The economic stability is illustrated by the data for state government and the federal government, the Number 1 and Number 2 basic industries in Lewis and Clark County. Lewis and Clark County was one of the very few urban areas in Montana that did not have at least one year of decline during the Great Recession in the last decade. The indicator of industry performance (inflation-adjusted earnings of workers) for state government in 2013 was almost identical (within 0.5 percent) to its value in 2008 (the year of the Great Recession). Similarly, the corresponding value for the federal government in 2013 was only 1 percent lower than in 2008 (Polzin 2016).

Household income totals the income of each person living in a household, whether related or not. The ROI's median household income in 2015 was \$56,197, which is higher than that of the state of Montana (\$47,169) and the U.S. (\$53,889). Per capita income (PCI) is the total income of an area divided by that area's population. The ROI's PCI of \$28,476 is higher than that of Montana (\$26,381) and is 98% of the U.S. PCI (\$28,930) (USCB 2017).

With 12.2 percent of its population below the poverty level, Lewis and Clark County has a lower poverty rate than Montana (14.6 percent) and the U.S. (13.5 percent) (USCB 2017).

Housing

The owner-occupied housing unit rate from 2011-2015 was 69.4% in Lewis and Clark County. The median selected monthly owner costs, with a mortgage from 2011-2015 was \$1,344 and the median gross rent during the same timeframe was \$783 (USCB 2017).

Schools

Helena is home to two institutions of higher education: Carroll College and the University of Montana – Helena College of Technology (UM Helena). From July, 2015 through June, 2016, Carroll enrolled 1,585 students (Carroll College 2017). UM Helena enrolled 1,396 students in Fall Semester 2016 (UM Helena 2017).

The ROI has a relatively well-educated population, with 94.6 percent of the population having graduated from high school compared to 92.8 percent for Montana and 86.7 percent for the U.S. The rate of college Bachelor's degrees or higher in the ROI, at 38%, is also higher than in Montana (29.5%) and the U.S. (29.8%).

3.10.1 Proposed Action

The Proposed Action would lead to increased job opportunities in the Lewis and Clark County area. The construction of the facilities is expected to take approximately 16 months and will employ approximately 350 unduplicated individual workers. Not many of these workers will be employed throughout the 16-month construction periods; workers under different trades will come and go as needed. Construction subcontractors will be selected based on best quality and pricing, and although it is not unusual for Montana construction companies to travel substantial distances for work, the majority of workers are expected to come from the Lewis and Clark County area. Along with employment provided as a result of construction of the facilities, property operations for the Project will employ 3 full time equivalent workers and 3 additional full time equivalent workers for veterans case management. Additional area revenues resulting from daily operations such as food delivery, linen care and delivery, building and landscape maintenance, vehicle purchase and maintenance, and facility events are foreseeable. Facility employees are expected to reside within the Lewis and Clark County-Helena area. The Proposed Action would be expected to increase property values for the area and will also result in increased revenues for the City of Helena and Lewis and Clark County including, but not limited to, business taxes and permit fees. New opportunities for health care professionals, social services, and other service-related industries would increase the relative percentage of these positions in the Lewis and Clark County-Helena area, and thus assist in diversifying both the economic opportunities and labor skills base for these communities.

Montana has the highest rate of unsheltered veterans in the U.S. at 63.3 percent (Harris 2015). The Project's historic renovation would result in a total of 40 units and new construction would provide a total of 2 units, for a total of 42 units. The veterans and their families, who will come from across Montana to reside in the Project, would also be expected to utilize businesses in the area, creating a secondary source of employment for area residents as business levels increase.

3.10.2 No Action Alternative

Under the No Action Alternative, the Project would not be constructed. No additional employment and other socioeconomic opportunities would be added to the Lewis and Clark County-Helena area.

3.11 COMMUNITY SERVICES

For the purposes of this EA, community services are defined as those physical services (e.g., shelter, electricity) needed to sustain members of a community.

3.11.1 Proposed Action

Construction and operation of the Proposed Action would occur within the existing Fort Harrison VAMC campus. The anticipated occupancy rate for the 42 units created under the Proposed Action is approximately 96 individuals. The Fort Harrison VAMC campus has community services (e.g., electricity, water, sewer, fire prevention/suppression, law enforcement) already in place. Operation of the Project would result in an incremental increase in demand for these services, but would not be expected to exceed the capacity of the existing services.

3.11.2 No Action Alternative

If the Proposed Action is not approved, there would be no demand for additional community services, and therefore there would be no effects to these services.

3.12 TRANSPORTATION AND PARKING

The Fort Harrison VAMC is located approximately 1.5 miles north of the intersection of Williams Street and U.S. Highway 12 (Euclid Avenue) on the west side of Helena, Montana. The Fort Harrison VAMC campus includes a network of paved streets connecting to a main entry point at Williams Street to the east of the hospital. Several existing patient, staff, and visitor parking areas are available immediately east and south of the hospital and other medical facilities. The

proposed Project is located between the southwest and northwest corners of the Fort Harrison VAMC campus and away from the primary travel route between the campus entrance and the hospital.

3.12.1 Proposed Action

Construction and renovation of the Project would result in a temporary influx of contractor vehicles and traffic to the hospital campus during daily work hours. The majority of the Project site is located along the west and southwest edge of the Fort Harrison VAMC campus, and away from the primary travel routes, main entrance and emergency entrance (Figure 2). However, renovation of residences along Middle Road would occur relatively close to the north side of the hospital. Service roads along the back (west and north) edges of the Project, including the Middle Road portion of the Project, would provide viable options for both contractor access and parking, which would minimize interference with users of Veterans Drive during the renovation and construction phases of the Project. There would be two temporary road closures during construction: (1) Veterans Drive would be closed at a single point adjacent to Building 3 long enough to connect a new sewer line into the existing sanitary sewer system; and (2) General Eschenberg Lane would be closed at a single point adjacent to Building 35 long enough to allow for a new potable water gate valve to be installed. The service road behind Buildings 3, 4, 5, and 35 will be closed for approximately a week during installation of new sanitary sewer lines that will serve the new construction. There would be no permanent road changes or rerouting on Project completion. Impacts of the additional vehicles, equipment, and personnel on the Fort Harrison VAMC campus would be mitigated by the development and implementation of a Traffic and Parking Management Plan prior to construction and renovation activities.

Ten, small parking lots ranging in size from 463 to 1920 square feet on a total of 0.25 acres would be constructed to create approximately 60 parking spaces for residents, staff and visitors (Figure 2). Parking lot and associated access (*e.g.* sidewalks, ramps) design would comply with the Americans with Disability Act (ADA).

3.12.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not be constructed and existing traffic and parking lot use levels would not be affected.

3.13 UTILITIES

Utilities required for operation of the proposed Project would include electricity, natural gas, water, sewer and telecommunications. Local public utility providers to the proposed site would include NorthWestern Energy (electricity and natural gas) and the City of Helena Public Works Administration (sewer and water). The telecommunication provider at the proposed site would be Century Link.

3.13.1 Proposed Action

The proposed new buildings would be constructed to VA sustainable design and Leadership in Energy and Environmental Design (LEED) design criteria that require increased efficiency in heating, air conditioning, lighting, and water systems compared to existing facilities. The Fort Harrison VAMC builds new construction to LEED specifications, but does not go through the LEED certification process. All utilities required for the newly constructed and renovated buildings would connect to the existing Fort Harrison VAMC infrastructure. There is currently no telecommunication point of presence at the existing buildings; the line would be extended from the main Century Link pedestal present at the main Fort Harrison VAMC entrance off Williams Street to the Project buildings. It is not anticipated that the Proposed Action would have a significant adverse effect on local public utilities or the remainder of the Fort Harrison VAMC.

3.13.2 No Action Alternative

Under the No Action Alternative, no construction or development by the VA would occur and therefore, no impacts to public utilities would occur.

3.14 SOLID AND HAZARDOUS MATERIALS

Preliminary surveys and sampling for hazardous materials, specifically lead-based paint and asbestos containing materials (ACM) within the 11 historic Project buildings proposed for renovation, indicate lead-based paint throughout the structures and the probable presence of ACM in some building components.

An ACM is any material that contains more than 1% asbestos. Asbestos and ACM are considered “air toxics” and are regulated by the EPA under the CAA to protect the public from exposure to airborne contaminants. The National Emission Standards for Hazardous Air Pollutants (NESHAP) are the limits placed on toxic airborne pollutants and the standards used for compliance monitoring. Regulated entities under NESHAP include construction, wrecking,

and demolition contractors. Additionally, OSHA protects workers in various industries from the hazards of asbestos exposure, and has set the permissible exposure limit (PEL) for asbestos at 0.1 fiber per cubic centimeter (f/cc) of air over an 8 hour work day for construction workers. Montana established the Asbestos Control Program (ACP) in 1989 to prevent unnecessary public exposure to asbestos. The ACP has been delegated by the EPA to administer NESHAP regulations, govern building renovations and demolitions, asbestos disposal, and other asbestos related activities (DEQ 2017b).

Lead is also an EPA regulated pollutant and hazardous material. Its presence in paint, dust, or soil falls under the Toxic Substances Control Act and the Residential Lead-Based Paint Hazard Reduction Act of 1992, and is subject to the Renovation, Repair, and Painting Rule.

The Resource Conservation and Recovery Act (RCRA), enacted in 1976 and administered by the EPA, serves as the basis for hazardous and non-hazardous waste management in the U.S. The DEQ has adopted the RCRA hazardous waste regulations promulgated by the EPA and maintains a database containing statewide locations of facilities or entities that are registered as Hazardous Waste Handler (HWH) in the state of Montana (DEQ 2017c). The Fort Harrison VAMC is a RCRA HWH, generating less than 100 kilograms per month of hazardous waste or 1 kilogram or less per month of acutely hazardous waste, and solid waste producer (garbage/refuse). Hazardous waste is handled by the Fort Harrison VAMC hospital and adjacent medical facilities; no hazardous waste is generated, stored, disposed of, or treated at the existing buildings proposed for Project renovation. This scenario would remain the same regardless of whether or not the Project is approved.

3.14.1 Proposed Action

Impacts from lead-based paint resulting from construction of the Proposed Action are expected to be minimal. It is assumed that every painted surface in the 11 existing buildings proposed for renovation contains lead-based paint. Rather than increase the risk of exposure, or the potential for airborne release, all painted surfaces in the structures would be encapsulated in place with new non-lead based paint. Pre-renovation cleaning and surface preparation would follow safe work practices for lead, including creating a contained work area and minimizing dust. All construction and renovation contractors would be certified lead-safe per EPA and DEQ Renovation, Repair, and Painting Rule requirements and would adhere to OSHA lead in construction standards.

Similarly, renovation activities may result in short term, minimal impacts from asbestos or ACM. Project renovation qualifies as an “asbestos project” under DEQ ACP regulations and as such, an asbestos project permit application would be filed with the DEQ prior to construction (DEQ

2017b). Those areas that would be impacted by demolition or new penetrations would be thoroughly tested prior to construction. An abatement and encapsulation plan would be prepared by the general contractor prior to initiating the Project, which would outline the hazardous material handling plan, segregation of demolition materials, proper disposal, and other required safe work practices.

The Project would not be likely to necessitate the storage or transfer of substantial amounts of other hazardous wastes such as fuel, hydraulic fluid, grease, or lubricants. Small quantities of these substances may be necessary for equipment operation and maintenance. They would be properly stored, along with other good housekeeping measures for a clean construction site.

The Project operations manual would include notices to all tenants with maintenance precautions and procedures to avoid lead-based paint. All facilities maintenance employees for the Project would undergo EPA lead-safe renovator training, as required by the Renovation, Repair, and Painting Rule (DEQ 2017d). With respect to ACM, an operating and maintenance plan would be prepared post renovation to provide guidance to property management staff on dealing with hazardous materials. The operations manual would presume that all non-renovated areas contain ACM unless additional testing is performed, and would inform tenants on maintenance restrictions and precautions. Potential effects from lead-based paint or ACM from Project operation would be minimal.

3.14.2 No Action Alternative

If the Proposed Action is not approved, then existing buildings would not be renovated and there would be no generation of solid or hazardous materials.

3.15 ENVIRONMENTAL JUSTICE

In 1994, EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, was issued to focus attention of federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities were addressed. In 1997, EO 13045, Protection of Children from Environmental - Health Risks and Safety Risks (Protection of Children), was issued to ensure the protection of children.

The Project area is mixed use, with military training offices to the north, military training facilities and open space to the west, parking areas and VA facilities and residential to the east,

and the Fort Harrison VAMC to the south. The Fort Harrison VAMC is located directly south and east of the Project site.

The majority of the population in Lewis and Clark County is white (91.4%), with 3.1% Hispanic or Latino, 2.2% American Indian or Alaska Native, 0.8% Asian, and 0.6% Black or African American. The ROI's median household income in 2015 was \$56,197, which is higher than that of the state of Montana (\$47,169) and the U.S. (\$53,889). Per capita income (PCI) is the total income of an area divided by that area's population. The ROI's PCI of \$28,476 is higher than that of Montana (\$26,381) and is 98% of the United States PCI (\$28,930) (USCB 2017).

With 12.2% of its population below the poverty level, Lewis and Clark County has lower rates of poverty than Montana (14.6%) and the United States (13.5%) (USCB 2017).

3.15.1 Proposed Action

It is anticipated the Proposed Action would create several jobs for area residents, contribute to local government tax revenue, and would convert currently vacant areas of land to an income generating facility that would provide services to eligible veterans. Additionally, the jobs created by the Proposed Action directly would require a variety of skill levels including, but not limited to, building maintenance; landscape maintenance; receptionist and other office employees; nurses; physicians; kitchen and food service; and security. This wide variety of employment opportunities would contribute positively to the City of Helena population.

3.15.2 No Action Alternative

The No Action Alternative would result in no additional opportunities for employment within the area that would be provided by the Project. No additional jobs, business, or tax revenues would be generated. The Project site would remain undeveloped and the historic buildings may remain vacant or would be available for another Project.

3.16 POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY

The Project would not be expected to generate substantial public controversy. The proposed construction site is located entirely within the existing, developed Fort Harrison VAMC campus and would connect to existing on-site utilities. The Project would provide housing for homeless, low income, at-risk, and disabled veteran individuals. In addition to its proximity to VA services, the Project location is within a pastoral setting which would provide for potential health and healing for veterans.

3.17 CUMULATIVE IMPACTS

For the purposes of this EA, cumulative impacts are defined as effects related to reasonably foreseeable future activities at the Fort Harrison VAMC campus. While future activities related to the development of the City of Helena, Lewis and Clark County, and the Fort Harrison training facility are likely, there are no known projects in the vicinity of the Fort Harrison VAMC campus that would pose any environmental impacts in combination with the Proposed Action.

Implementation of the Proposed Action would be expected to reduce the demand for services for homeless veterans currently borne by Helena and other Montana communities. As discussed in previous sections, the Proposed Action would result in incremental increases in demand for certain physical services at the Fort Harrison VAMC campus, but none of these increases would be expected to surpass the existing capacities of the facility. There would continue to be capital improvements to the Fort Harrison VAMC campus regardless of whether the Proposed Action is approved. It is possible the VA would seek to develop a second phase of residential construction on the Fort Harrison VAMC in the future. If a second phase is approved and developed, then there would be additional demands for services. These demands would be addressed in a separate environmental impact analysis at the time a second phase is proposed.

4.0 PUBLIC INVOLVEMENT

Two public meetings were held to present the Project to members of the community. The initial meeting occurred on June 25, 2009, and the second on October 26, 2016. Both meetings were held at the Fort Harrison VAMC. On March 1, 2017, the VA submitted letters to all Native American tribes with possible cultural or ancestral interests in the Project soliciting input and participation in Project consultation. No responses were received.

A draft of the EA was made available for a 30-day public comment period on July 31, 2017. One comment was received regarding transportation, for which the VA prepared a response. The comment did not require alteration of the EA.

Appendix B includes copies of agency correspondence, tribal consultation letters, public comments, and the MTSHPO concurrence letter for the final Section 106 consultation.

5.0 MITIGATION

State and federal agency control measures and regulations will be implemented during the construction and operation of this Project to address negative environmental impacts.

Table 5-1 presents a summary of the impacts and management measures for resources involved in the Project.

Table 5-1. Mitigation Measures

Resource	Proposed Action Impacts	Proposed Action Mitigation
Aesthetics	<p>The current Fort Harrison VAMC campus is a mixture of existing historic and modern buildings. The Project would combine historic renovation and new construction. Renovation of the existing historic buildings would not alter the exterior appearance.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Impacts to the visual aesthetics of the historic buildings by new construction would be moderated by incorporating design recommendations from MTSHPD during the remainder of the design and development process as specified in the conditions on the final Section 106 consultation.</p>
Air Quality	<p>Temporary, minor negative impacts to air quality may occur from construction activities such as fugitive dust or renovation of ACM.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Appropriate dust control measures and the implementation of relevant EPA and OSHA safe work practices would limit impacts during construction. Dust would be controlled via watering the site or applying soil stabilizers.</p>
Noise	<p>Noise levels would temporarily increase during construction. Construction noise would be limited to daylight hours and to typical construction equipment. No blasting or pile driving would occur. The increase in noise could temporarily deter use of the site by area wildlife.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Construction workers would be required to adhere to the PEL of 90 dB per 8-hour work day.</p>

Resource	Proposed Action Impacts	Proposed Action Mitigation
Hydrology and Water Quality	<p>Construction and renovation would occur on a previously disturbed and partially developed site. The Project would disturb approximately 1.3 acres of soil. Where renovation is proposed, existing landscape would be left undisturbed.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>The Project would preserve existing vegetation as feasible. Temporary erosion control measures would be installed as outlined in the Project SWPPP and as soon as grading and/or excavation is completed for any portion of the site. Revegetation efforts on areas that are non-active would be within 14 days of completion of construction activities. Erosion control measures would be applied in concentrated flow paths. These measures may include all or some of the following: check dams, temporary seeding, velocity dissipation devices, slope drains, etc. as required during construction. Sufficient erosion control measures would be maintained on site.</p>
Geology and Soils	<p>Construction activities may result in minor, short-term soil erosion and sedimentation during clearing, grading, and vegetation removal.</p> <p>A significant long-term effect is not anticipated for this impact.</p>	<p>The implementation of construction BMPs, adherence to the Project SWPPP, and any applicable water quality permit requirements would limit potential impacts from soil erosion.</p>
Wildlife and Habitat	<p>The Project is not in or near critical habitat for USFWS Threatened, Endangered, Proposed, or Candidate species. Construction and operation, through an increase in human activity and presence, may temporarily displace, or deter, resident bird and mammal species.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>For bird species protected under the MBTA, nests with eggs or young may not be harmed or killed. Tree and shrub removal would be conducted outside of the avian breeding season, where feasible. If not feasible, then a qualified biologist would survey the area prior to removing shrubs or trees. If nests or evidence of nesting are observed, then a buffer would be delineated to prevent destruction of, or disturbance to, nests until they are no longer active.</p>
Wetlands and Floodplains	<p>There are no wetlands or floodplains located within the Project footprint; however, two intermittent waterways are nearby and could be affected by sedimentation or runoff.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>Construction BMPs, the Project SWPPP, and dust control measures would limit fugitive dust and sediment to prevent impacts to adjacent drainages.</p>

Resource	Proposed Action Impacts	Proposed Action Mitigation
Cultural Resources	<p>Cultural resources may be encountered from former historic Buildings 6, 7, and 8 during new construction. Additionally, the design of the new buildings could negatively impact the aesthetics of the FHVH Historic District. Renovation of the existing historic buildings would not alter the exterior design or style.</p> <p>No adverse effect is anticipated for this impact provided conditions specified in the final Section 106 determination for cultural resources are met.</p>	<p>Archaeological monitoring of ground disturbance associated with the new duplex and clubhouse will be conducted during construction. Archaeological monitoring would seek to evaluate any cultural resources encountered during construction and evaluate said resources for their potential eligibility in the NRHP.</p> <p>The rehabilitation of all eleven historic buildings will be compliant with the Secretary of the Interior's Standards for Rehabilitation and the developer will maintain ongoing consultation with the MTSHPO during the remainder of the design and development process to ensure no significant effect to visual aesthetics of the FHVH Historic District by the new buildings.</p>
Land Use	<p>The use of the Project area for veteran housing is consistent with the mission of the VA and the proposed uses of the Fort Harrison VAMC.</p> <p>A significant effect is not anticipated for this impact.</p>	No mitigation is required.
Socioeconomics	<p>The Proposed Action would lead to increased job opportunities in the Lewis and Clark County area. The construction of the facilities is expected to take approximately 16 months and would employ approximately 350 unduplicated individual workers. Along with employment provided as a result of construction of the facilities, property operations for the Project would employ 3 full time equivalent workers and 3 additional full time equivalent workers for veterans case management.</p> <p>A significant effect is not anticipated for this impact.</p>	No mitigation is required.

Resource	Proposed Action Impacts	Proposed Action Mitigation
Community Services	<p>Operation of the Project would result in an incremental increase in demand for community services, but would not be expected to exceed the capacity of the existing services in place at the Fort Harrison VAMC.</p> <p>A significant effect is not anticipated for this impact.</p>	No mitigation is required.
Transportation and Parking	<p>Construction and renovation of the Project would result in a temporary influx of contractor vehicles and traffic to the hospital campus during daily work hours. Temporary road closures would occur during new utility hookups.</p> <p>There would be no permanent road changes or rerouting on Project completion.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>The Project would develop a Traffic and Parking Plan to be implemented during renovation and construction activities on the Fort Harrison VAMC campus. The plan would identify contractor parking locations, re-route traffic around affected areas, and present alternatives for staff and visitors. Construction-related truck traffic shall be scheduled to avoid peak travel time on the adjacent thoroughfares, as feasible. The construction contractor shall provide a copy of the Traffic Control Plan to the local traffic authority for review prior to construction. If pedestrian or bicycle routes on the Fort Harrison VAMC campus are temporarily blocked, then alternate routes around construction areas would be provided to the extent feasible. These alternate routes would be posted on campus during the duration of construction.</p>
Utilities	<p>All utilities required for the newly constructed and renovated buildings would connect to the existing Fort Harrison VAMC infrastructure.</p> <p>A significant effect is not anticipated for this impact.</p>	No mitigation is required.

Resource	Proposed Action Impacts	Proposed Action Mitigation
Solid and Hazardous Materials	<p>Potential temporary and minor effects from lead-based paint and ACM are possible during renovation of the existing buildings.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>All contractors would be lead-safe trained and certified. Lead-based paint would be encapsulated with non-lead paint. Thorough testing for ACM would occur prior to renovation. Disturbance to ACM would be limited to the few areas where building modification is necessary. An ACM abatement and encapsulation plan would be prepared prior to renovation and the Project would apply for an asbestos permit from the DEQ.</p>
Environmental Justice	<p>The Project is anticipated to create several jobs for area residents, contribute to local government tax revenue, and would convert currently vacant areas of land to an income generating facility that would provide services to eligible veterans.</p> <p>A significant effect is not anticipated for this impact.</p>	<p>No mitigation is required.</p>

6.0 CONCLUSIONS

This assessment concludes there would be no significant adverse effect to the human or natural environment, provided adherence to the conditions placed on cultural resources as part of the final Section 106 NHPA consultation and the implementation of best management practices (BMPs) and regulatory compliance control and mitigation measures. As such, this EA concludes that a Finding of No Significant Impact (FONSI) is appropriate, and an EIS is not warranted.

7.0 LIST OF PREPARERS

Table 7-1 below presents a list of individuals who contributed to the preparation of this EA.

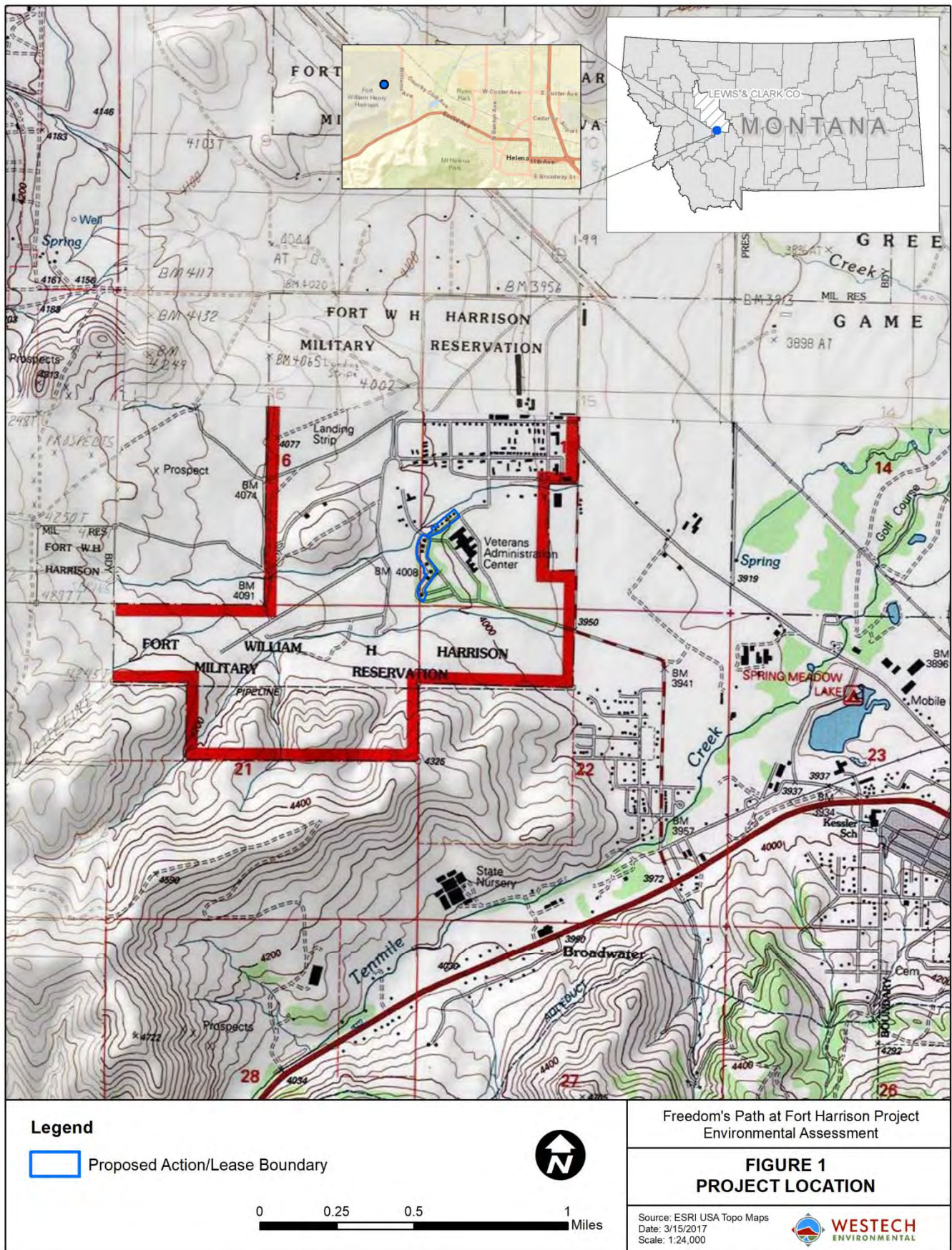
Table 7-1. List of Preparers

Name	Company	Title	Responsibilities
Jessica Allewalt	WESTECH Environmental Services, Inc. (WESTECH)	Ecologist	Project Manager Prepared EA Geology and Soils Solid and Hazardous Materials
Patricia Corry, PhD	WESTECH	Sr. Plant Ecologist	EA Reviewer
Patrick Farmer	WESTECH	Sr. Wildlife Biologist/NEPA Specialist	Aesthetics Community Services Cumulative Impacts EA Reviewer
Dave Hagen	WESTECH	Sr. Biologist	Air Quality Hydrology and Water Quality Wildlife and Habitat Wetlands and Floodplains Transportation and Parking Utilities
Brian Herbel, M.A.	Rabbitbrush Archaeological Services, LLC.	Sr. Archaeologist & Owner	Cultural Resources Construction Monitoring Plan (Appendix A)
Nancy Scow	WESTECH	Database Administrator	Word Processing
Meghan Wirth	WESTECH	Ecologist/NEPA Specialist	Noise Land Use Socioeconomics Environmental Justice

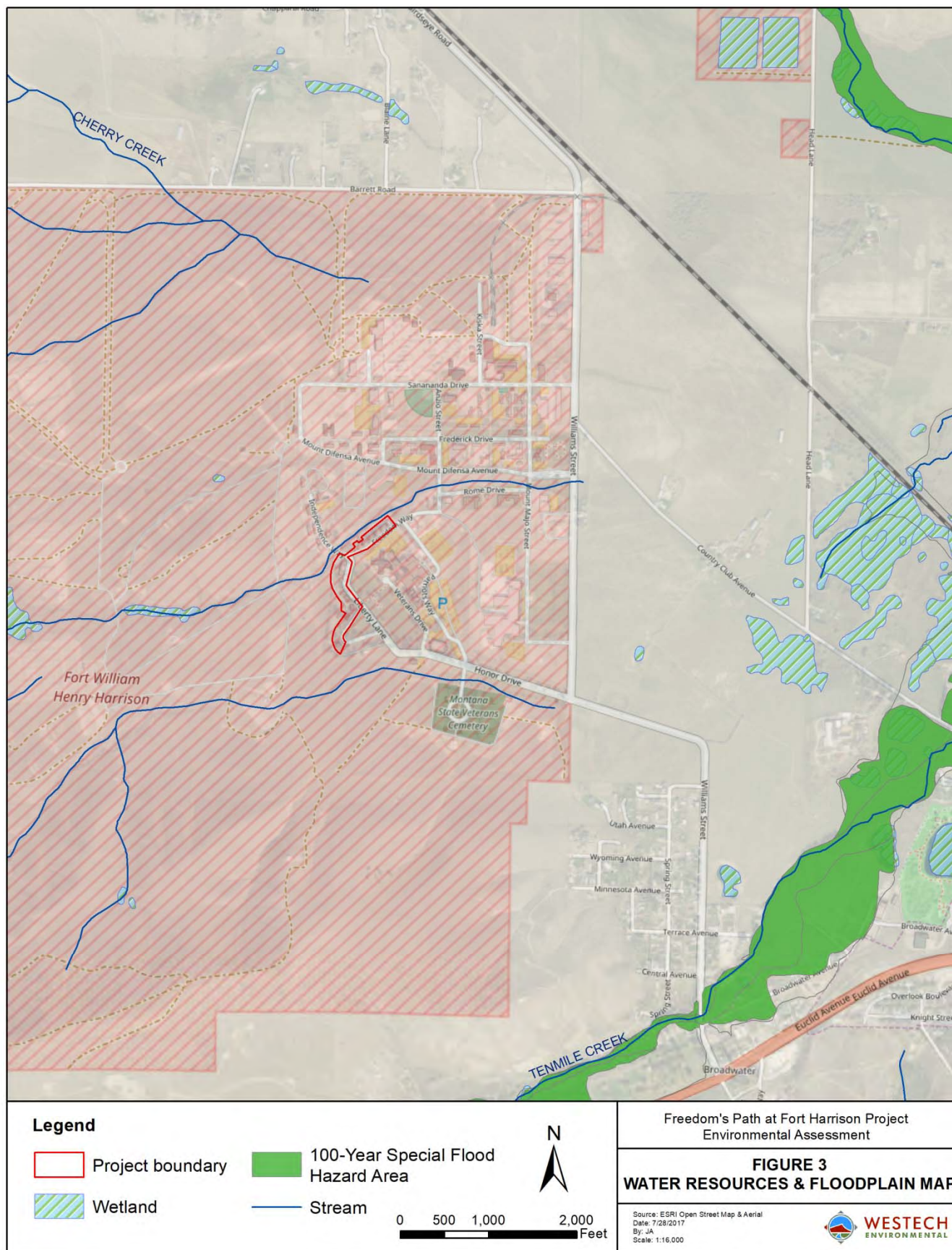
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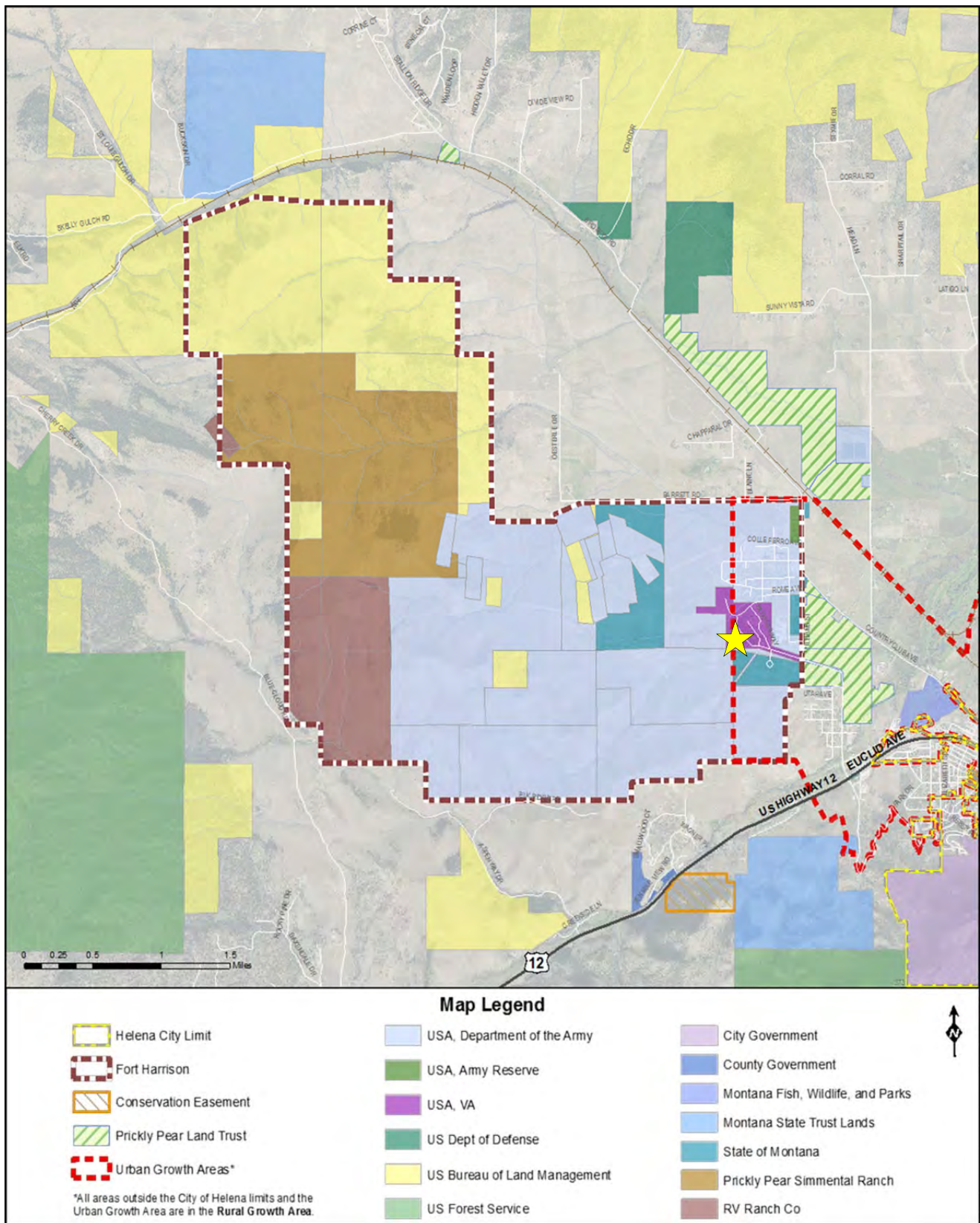


FIGURE 5 – LAND USE. Land ownership in the vicinity of the Project (location starred).
Excerpt from Lewis and Clark County Growth Policy Update 2015 Volume 2, Chapter 7 – Fort Harrison Joint Land Use Study (Lewis and Clark County 2016).

APPENDIX A

Cultural Resources Construction Monitoring Plan

Cultural Resources Construction Monitoring Plan

The following Cultural Resources Construction Monitoring Plan (Plan) pertains to the Freedom's Path at Fort Harrison Project (Project) near Helena, Montana. This plan will be implemented during construction of the proposed two new buildings (duplex and clubhouse) to prevent impacts to potential subsurface cultural resources.

Monitoring

Ground disturbance monitoring will be conducted by a professional archaeologist or archaeological monitor. The professional archaeologist or archaeological monitor will be present on-site during ground disturbing activities associated with the new duplex and associated parking areas as it relates to original Building 6 and its possible subsurface features (see Figure 4 in the Final Environmental Assessment for the Project).

The archaeological monitor will follow all safety regulations and wear personal protective equipment that included a hard hat, safety glasses, and a high visibility vest. Daily notes will be recorded on a notebook, and will include the depth, location, and description of soil strata, finds, and debris not considered significant. Photographs will be taken daily, including overviews of specific construction areas, soil profiles, cultural materials, and work in progress.

During excavation, the archaeological monitor will stand in safe proximity to construction equipment in order to view subsurface deposits as they are exposed, and maintain close communication with equipment operators to ensure adequate opportunity for observation and documentation, as well as safety. Should a discovery be made and the opportunity to determine its nature is best suited by the cessation of construction activities, then ground disturbance should halt to allow for an accurate assessment to be made. The archaeological monitor will be expedient and prudent in evaluation so that construction activities may resume.

Discoveries will be recorded and evaluated according to standards and procedures used for recording sites during Class III inventory as defined by the Montana State Historic Preservation Office (MTSHPO) and the National Register of Historic Places (NRHP). Initial treatment of discoveries will include recording the location of the find within the Project Area of Potential Effect (APE); recording summary data concerning the discovery (e.g., dimensions, qualitative characteristics, associated materials); photographing the discovery; and if necessary, profiling trench walls containing cultural features or strata (where safe and prudent).

Discoveries made during construction may require excavation, though given the nature of the resources likely present in the Project APE, the discovery of intact features that can be excavated is unlikely. If, however, excavation is prudent and approved by the U.S. Department of Veterans Affairs (VA), all feature fill will be collected for laboratory analysis; feature plans and profiles will be drawn; features will be photographed; and uncollected feature fill will be screened using 0.25-inch mesh, if necessary.

The archaeological monitor will inspect Project excavations and recovered sediments to examine for indications of archaeological resources. The monitor will be provided the opportunity to screen excavated sediments and soil matrix samples when this is judged useful to the identification process. Modern fill (e.g., imported culturally-sterile construction fill) or glacial till sediments will not be included in screening activities. Excavated spoils will be examined in the course of monitoring. If cultural materials are observed in spoils piles, then it is expected that these would be removed for examination and that the opportunity to screen spoil sediments will be available.

A written report describing the results of the monitoring will be prepared by the archaeological monitor as soon as practicable and will include recommendations of site significance, and avoidance or treatment for any potentially intact, NRHP eligible site component/features. The report will be submitted to the VA and the MTSHPO. If upon further investigation, discoveries are determined to be: 1) isolated, 2) a simple discovery, or 3) completely disturbed, then the archaeological monitor will notify the VA as well as the onsite foreman to resume construction, subject to any further treatment that may be required.

If the discovery is significant or is recommended to satisfy NRHP eligibility criteria, and the Project will have an adverse effect on the resource, then the archaeological monitor will develop a Treatment Plan to avoid, minimize, or mitigate the adverse effect within the construction footprint. The VA may choose to develop the Treatment Plan in coordination with the MTSHPO.

Inadvertent Discovery

In the event that archaeological deposits are inadvertently discovered during construction in any portion of the Project's APE, ground-disturbing activities should be halted immediately in an area large enough to maintain integrity of the deposits, and MTSHPO, interested tribes, and the VA project manager should be immediately notified.

If the find were to include or consist of human remains, then all activity that may cause further disturbance to those remains must cease, and the area of the find must be secured and

protected from further disturbance. In addition, the finding of human skeletal remains must be reported to the county coroner and local law enforcement in the most expeditious manner possible. The remains should not be touched, moved, or further disturbed.

The county coroner would assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county coroner determines the remains are non-forensic, then they will report that finding to VA and the MTSHP. VA will work with the MTSHP and State Physical Anthropologist to make a determination of whether the remains are Indian or non-Indian, and report that finding to any appropriate cemeteries and the affected tribes. VA will coordinate with the MTSHP in handling all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

APPENDIX B

Agency Correspondence



Veterans Health Administration

Montana VA Health Care System

VA Medical Center

Fort Harrison

1-877-468-8387

(406) 442-6410

- Option 1, Pharmacy
- Option 2, Schedule an Appt
- Option 3, Triage Nurse
- Option 4, Eligibility
- Option 5, Billing questions

VA Clinics can be found at the following locations:

Anaconda VA Clinic

(406) 496-3000

Billings VA Health Care Center

(406) 373-3500

Bozeman VA Clinic

(406) 582-5300

Cut Bank VA Clinic

(406) 873-9047

Glasgow VA Clinic

(406) 228-4101

Glendive VA Clinic

(406) 377-4755

Great Falls VA Clinic

(406) 791-3200

Hamilton VA Clinic

(406) 363-3352

Havre VA Clinic

(406) 265-4304

Helena VA Sleep Center

(406) 447-7443

Kalispell VA Clinic

(406) 758-2700

Lewistown VA Clinic

(406) 535-4790

Miles City VA Clinic

(406) 874-5600

Miles City VA Community Living Center

(406) 874-5600 Option 4

Missoula VA Clinic

(406) 493-3700

Plentywood VA Clinic

(406) 765-3718

Additional information at:

www.montana.va.gov

Date: August 25, 2017

Montana VA Health Care System

3687 Veterans Drive

P.O. Box 1500

Fort Harrison, MT 59636-1500

Montana State Historic Preservation Office

Attn: Pete Brown

225 North Roberts

PO Box 201201

Helena, MT 59062-1201

CONCUR
MONTANA SHPO
DATE 8/29/17 SIGNED *[Signature]*

RE: Fort Harrison Enhanced Use Lease, Fort Harrison, Montana

Dear Mr. Brown:

Thank you for your continuing consultation regarding the proposed Freedom's Path at Fort Harrison Enhanced Use Lease (EUL) at the Fort Harrison VA Medical Center (VAMC). In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, we are providing additional information, including a finding of no adverse effect for this undertaking, for your review and concurrence.

The scope of the planned EUL has changed since we initiated consultation with your office in January 2017. The revised undertaking will consist of forty-two (42) units of housing, and will include rehabilitation of eleven (11) historic buildings and construction of two (2) buildings. The existing buildings are within, and contribute to, the Fort Harrison Veterans Hospital Historic District, which was placed on the National Register of Historic Places on December 20, 2016 (NRIS 16000874). The EUL encompasses approximately 6 acres within the Fort Harrison VAMC campus and is within walking distance to the VA hospital and affiliated care facilities immediately east of the lease parcel.

Based on our research of the property in VA and SHPO records, environmental and archeological work performed by Westech Environmental Services and Rabbitbrush Archaeological Services, and in consultation with SHPO staff, we have defined the Area of Potential Effect (APE) as the identified on the attached map.

A Class III Cultural Resources Inventory completed by Rabbitbrush Archaeological Services, delivered to your office on August 10, 2017, documents that no archaeological resources were identified as a result of a pedestrian survey of the portions of the APE where ground disturbance will occur due to the undertaking. However, given the high probability of subsurface, possibly intact, archaeological remains, Rabbitbrush recommends that ground disturbance associated with the proposed clubhouse construction be monitored for possible subsurface features related to original Building 6 (nonextant). VA agrees with the conclusions and recommendations of the report, and will ensure that the developer, Communities for Veterans, adheres to the monitoring plan developed by Rabbitbrush by including it in the lease documents.

In addition, a draft Environmental Assessment (EA) was completed in July 2017 by Westech Environmental Services, which concluded there would be no significant adverse effect to the human or natural environment, provided the development adheres to the conditions placed on cultural resources as part of the final Section 106 NHPA consultation. A link to the draft EA was provided to your office on August 16, 2017.

Based on the conclusions of the draft EA and archaeological report, VA finds that the undertaking will have ***no adverse effect***, pursuant to 36 CFR 800.5(b), provided that the following conditions are met:

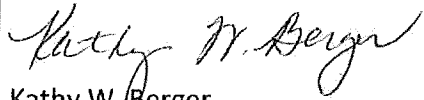
- The developer will rehabilitate the historic buildings within the EUL to meet the Secretary of the Interior's Standards for Rehabilitation. The proposed development plan utilizes both low income and historic tax credits, and thus will be required to meet these standards as a condition for funding.
- The developer will maintain ongoing consultation with your office throughout the remainder of the design and development process.
- The developer will implement the monitoring plan for ground disturbing activities associated with construction of the clubhouse, near the site of former Building 6. Any recovered artifacts will remain the property of VA.

If there are any changes to the undertaking or disputes regarding implementation of the above conditions, VA will reinstitute consultation with SHPO and others as necessary prior to continuation of the project.

Per 36 CFR 800.11(e), attached for your review are copies of documents supporting our finding, including a map of the APE, a proposed site plan, a summary of the proposed project, and the monitoring plan. We previously provided copies of the Class III Cultural Resource Inventory and draft Environmental Assessment.

Please direct any questions to Kelli Emery, EUL Project Manager, at (202) 590-8793 or by email at kelli.emery@va.gov. Thank you for your attention to this matter.

Sincerely,



Kathy W. Berger

Director, VA Montana Health Care System

Attachments: Map of the APE
Project Site Plan
Project Summary
Monitoring Plan

Concurrence:

State Historic Preservation Officer

Date

ATTACHMENT I

Area of Potential Effect (APE)



30-DAY PUBLIC COMMENT PERIOD – RECEIVED COMMENTS AND RESPONSES

-----Original Message-----

From: Emery, Kelli [<mailto:Kelli.Emery@va.gov>]

Sent: Monday, August 28, 2017 4:16 PM

To: Kilian, Stephanie A.

Subject: RE: Transportation...Freedom's Path at Fort Harrison Project

Dear Ms. Kilian,

To address your comments below....At this time, the local public transit system leadership is not willing to expand service to Freedom's Path.

However, after the project opening, the effort will be renewed. Short of that, experience on other EUL sites demonstrates that vehicle ownership ranges from 50% to as high as 80% for residents. An informal system of ride-sharing and car-pooling is very much in evidence. This will be promoted at Ft. Harrison.

Further, the Developer has arranged for the delivery of groceries to the property from two separate grocery chains, thus relieving some of the necessity for making trips to Helena.

The Developer will contract with a local non-profit organization (Montana Independent Living Project-MILP) to provide subsidized individual transportation along the lines of an Uber or taxi service. The cost will be the same as bus-fare for this service. This will afford to disabled residents the ability to arrange individual trips at an affordable rate.

The Developer will contract with a local nonprofit corporation (Spring Meadow Resources) to provide a morning and evening shuttle service from the property to a local Helena transit stop once each way--inbound in the morning and outbound in the evening) to allow residents with employment or educational transportation needs to transit from the site to the city public transit system."

Thank you, Kelli Emery

-----Original Message-----

From: Kilian, Stephanie A.

Sent: Friday, August 04, 2017 1:12 PM

To: Emery, Kelli

Subject: RE: Transportation...Freedom's Path at Fort Harrison Project

Kelli,

I was concerned when I did not see any information about bus shelter placement, and areas for public transportation, bus stops, in the plan.

Many of my patients are unable to drive, and if they were placed in units at Fort Harrison would be completely isolated from the greater community of Helena.

The walkability score, for Fort Harrison, is "5", that means car dependent, almost all errands require a car.

<https://www.walkscore.com/score/3687-veterans-dr-fort-harrison-mt-59636>

It is 19 minutes to Helena by car
60 plus minutes by bike, or walking.

I recommend that all of my patients get a walkability score before they move any place, and only rent or buy in an area with a walk score of 90 or more.

Accessibility for public transportation would be of great benefit to VA Montana Medical Center, as currently, for people who do not drive, it costs \$25 for a cab ride, one way, from Helena, to Fort Harrison, to visit people in the hospital. Veterans can utilize VA transportation for appointments at Fort Harrison, but if they are in the hospital, and their family wants to visit them, if they don't drive, they have to rely on others, or take a cab. It is quite expensive.

I believe, if public transportation was available to Fort Harrison more employees would use it as well, and take advantage of the transit pass available for federal employees. This would include the hospital, and adjoining Base, Fort Harrison as well.

Thank you for the update.

Stephanie Kilian

-----Original Message-----

From: Emery, Kelli

Sent: Friday, August 04, 2017 10:59 AM

To: Kilian, Stephanie A. <Stephanie.Kilian2@va.gov>

Subject: RE: Transportation...Freedom's Path at Fort Harrison Project

Good Morning,

The Developer spoke about ongoing discussions with Helena Area Transit regarding bus service to the EUL in their development Plan. We have requested an update how those discussions are going, or what alternative plans are in place for transportation to and from the EUL. I will let you know when I have the update. Thank you, Kelli Emery

-----Original Message-----

From: Kilian, Stephanie A.

Sent: Wednesday, August 02, 2017 2:28 PM

To: Emery, Kelli

Cc: modrepro@mt.net

Subject: Transportation...Freedom's Path at Fort Harrison Project

Kelli,

https://www.montana.va.gov/features/linked_docs_and_photos/Freedoms_Path_EA_DRAFT_20170728.pdf

I read with interest the proposal to build housing for veterans at Fort Harrison, but I did not see any mention of the lack of public transportation to Fort Harrison.

This is particularly important for veterans who have disabilities, if they do not drive, as they would not have any method of transportation to Helena for groceries, finding employment, or meeting with other government agencies, like State of Montana Vocational Rehabilitation, without access to transportation.

Has this been addressed with the city of Helena, in regards to having bus service available to Fort Harrison, for this housing project?

Otherwise, you are building something, that many veterans would be stuck, if they don't have a car, or ability to drive one. And it is also inaccessible for people to visit them, who do not have access to a car, or ability to drive.

Currently, the closest bus stop to Fort Harrison is roughly 5 miles away. Without sidewalks. Completely inaccessible for someone with a disability. And inconvenient for someone who needs transportation for employment in Helena.

Stephanie Kilian, MA. MS.
CLVT, COMS, CRC, CVRT
Low Vision Therapist
VA Montana Health Care System
3687 Veterans Drive
Fort Harrison MT 59636
406-447-7565

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Veterans Health Administration

VA Montana Health Care System

VA Medical Center
Fort Harrison
877-468-8387
(406) 442-6410

VA Clinics can be found at
the following locations:

Anaconda VA Clinic
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Kalispell VA Clinic
(406) 758-2700

Lewistown VA Clinic
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Miles City VA Clinic
(406) 874-5600

Miles City VA Community
Living Center
(406) 874-5600 Option 4

Missoula VA Clinic
(406) 493-3700

Plentywood VA Clinic
(406) 765-3718

VA Sleep Disorders Center
(406) 447-7443

Additional information
can be found at:
www.montana.va.gov

March 1, 2017

Blackfeet Tribal Business Council

Attn: Harry Barnes, Chairman

All Chiefs Square

PO Box 850

Browning, MT 59417

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman Barnes:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

The VA has selected the development team of Communities for Veterans for this project. The project, named "Freedom's Path at Fort Harrison" by the development team, includes renovations to eight (8) historic structures and the construction of three (3) new residential buildings and one (1) community center with priority placement for Veterans who are homeless or at risk of homelessness, or who are disabled, and who have the ability to live independently while benefiting from proximity to VA services. The project will produce forty-two (42) housing units of permanent supportive housing, and is fully supported by VA.

The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Blackfeet Tribal Business Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy W. Berger". The signature is fluid and cursive, with the first name "Kathy" being more prominent.

Kathy W. Berger
Director
VA Montana Health Care System



Veterans Health Administration

VA Montana Health Care System

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Additional information
can be found at:
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March 1, 2017

Chippewa Cree Tribal Council

Attn: Harlan Baker, Chairman
31 Agency Square, Box 544
Box Elder, MT 59521

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman Baker:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

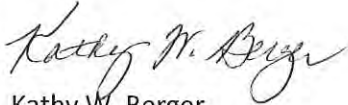
The VA has selected the development team of Communities for Veterans for this project. The project, named "Freedom's Path at Fort Harrison" by the development team, includes renovations to eight (8) historic structures and the construction of three (3) new residential buildings and one (1) community center with priority placement for Veterans who are homeless or at risk of homelessness, or who are disabled, and who have the ability to live independently while benefiting from proximity to VA services. The project will produce forty-two (42) housing units of permanent supportive housing, and is fully supported by VA.

The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Chippewa Cree Tribal Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

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Kathy W. Berger
Director
VA Montana Health Care System



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March 1, 2017

Confederated Salish & Kootenai Tribal Council

Attn: Vernon Finley, Chairman
PO Box 278
42487 Complex Blvd
Pablo, MT 59855

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman Finley:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

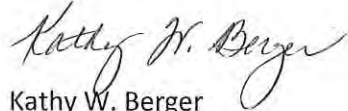
The VA has selected the development team of Communities for Veterans for this project. The project, named "Freedom's Path at Fort Harrison" by the development team, includes renovations to eight (8) historic structures and the construction of three (3) new residential buildings and one (1) community center with priority placement for Veterans who are homeless or at risk of homelessness, or who are disabled, and who have the ability to live independently while benefiting from proximity to VA services. The project will produce forty-two (42) housing units of permanent supportive housing, and is fully supported by VA.

The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Confederated Salish & Kootenai Tribal Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

A handwritten signature in cursive script, reading "Kathy W. Berger".

Kathy W. Berger
Director
VA Montana Health Care System



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March 1, 2017

Crow Tribal Council

Attn: A. J. Not Afraid, Chairman
PO Box 159
Bacheeitch Avenue
Crow Agency, MT 59022

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman A.J. Not Afraid:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

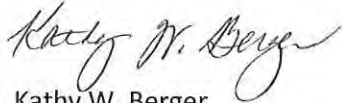
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The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Crow Tribal Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

A handwritten signature in cursive script, reading "Kathy W. Berger".

Kathy W. Berger
Director

VA Montana Health Care System



Veterans Health Administration

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Additional information
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March 1, 2017

Fort Belknap Indian Community Council

Attn: Mark L. Azure, President
656 Agency Main Street
Harlem, MT 59526

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear President Azure:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

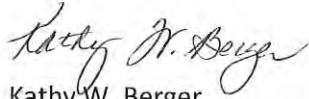
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The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Fort Belknap Indian Community Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

A handwritten signature in cursive script, reading "Kathy W. Berger".

Kathy W. Berger
Director
VA Montana Health Care System



Veterans Health Administration

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can be found at:
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March 1, 2017

Fort Peck Tribal Executive Board

Attn: Floyd Azure, Chairman
PO Box 1027
501 Medicine Bear Road
Popular, MT 59255

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman Azure:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

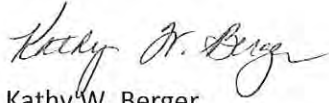
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The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Fort Peck Tribal Executive Board as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

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Kathy W. Berger
Director
VA Montana Health Care System



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March 1, 2017

Little Shell Chippewa Tribe

Attn: Gerald Gray, Chairman
625 Central Avenue West, Suite 100
Great Falls, MT 59404

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear Chairman Gray:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

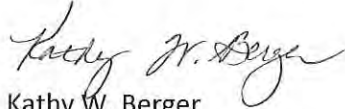
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The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Little Shell Chippewa Tribe as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

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Kathy W. Berger
Director
VA Montana Health Care System



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March 1, 2017

Northern Cheyenne Tribal Council

Attn: Jace Killsback, President
PO Box 128
600 Cheyenne Avenue
Lame Deer, MT 59043

RE: VA Medical Center, Fort Harrison Montana
Proposed Enhanced Use Lease

Dear President Killsback:

To enhance and support its mission, the United States Department of Veterans Affairs (VA) under its enhanced-use leasing ("Enhanced-Use Lease" or "EUL") authority, codified at 38 U.S.C. §§ 8161-8169, has entered into an EUL agreement for the construction of a housing facility for homeless and disabled Veterans at the Fort Harrison VA Medical Center (VAMC) in Helena, Montana. VA is proposing the execution of an EUL for eight (8) buildings and approximately five (5) acres of associated land. The purpose of this EUL is for the development and operation of new supportive permanent housing units for eligible Veterans and their families with on-site supportive services.

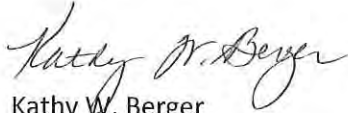
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The Fort Harrison VAMC was recently added to the National Register of Historic Places by the National Park Service. We have identified the Northern Cheyenne Tribal Council as having possible cultural or ancestral interest in the Fort Harrison VA Medical Center campus. Because of this possible interest, the VA is inviting you to participate in consultation on this project. We have taken similar action inviting consultation from the Montana State Historic Preservation Office.

We respectfully request to initiate consultation with your office in order to mitigate any potential adverse effects associated with the proposed EUL.

I look forward to working with your office. Please feel free to contact Mr. W. J. "Buck" Richardson Jr., Minority Outreach Coordinator, at 406-447-7547 or by email at william.richardson@va.gov.

Sincerely,

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Kathy W. Berger

Director

VA Montana Health Care System

February 10, 2017

Peter Rudd, SMA Architects

Re: Tax Credit Part 1 guidance, Parking and infill construction design at the Ft. Harrison VA, Helena

Dear Peter,

As you continue to work on Part 1 of the Federal Rehab Tax Credit application, one important component that you will need to include with it is a letter from the Veterans' Administration. The letter must describe the agreement it has with Beneficial Communities that permits Beneficial Communities to rehabilitate and use the grounds and buildings within the scope of this project. The letter must identify each property involved in this arrangement. NPS will need a copy of that letter with an original signature on it.

The site plan and infill building designs you provided SHPO, coupled with proposed rehabilitation of historic properties at Ft. Harrison have both Sec. 106 and Federal Rehab Tax Credit components. Reviews required under Sec. 106 and the tax credit program are separate but interrelated. SHPO has authority in the Sec. 106 process, but serves as liaison between the applicant and National Park Service under the tax credit program. NPS has sole authority to certify or deny tax credit applications.

Both Sec. 106 and tax credit review processes call on the property owner to work within the Secretary of the Interior's Standards for Rehabilitation. We have been reviewing proposed rehab treatments under the Standards, but the Standards also apply to site modifications and infill construction occurring within a federal undertaking and tax credit projects. Though all ten of the Standards might apply, Standard 9 is particularly related to SHPO's and NPS's comments in this memo.

*9. New additions, exterior alterations, or **related new construction** shall not destroy historic materials that characterize the property. The new work shall be **differentiated from the old and shall be compatible with the massing, size, scale, and architectural features** to protect the historic integrity of the property and its environment.*

SHPO and SMA have discussed parking and infill designs previously. Today I discussed these items with Gary Sachau of the NPS. Here are SHPO's and NPS's combined comments and recommendations:

- Parking should not introduce a conspicuous, non-historic element (hardscape and parked cars) immediately adjacent to historic buildings, the parade ground, or the triangle-shaped park opposite the officers' houses. We recommend relocating parking to the far side of the service road running behind the historic buildings.
- The scale and massing of Buildings D1, E2, F2, and G2 is too large relative to the scale and massing of adjacent historic buildings. Historic Building 2 is the largest among the historic buildings, but is a lone example of a *large* building. Beyond its scale, Building 2's massing is kept in check. It is made up of three distinct components: a center core and two smaller wings. The wings are shorter than the

core and have inset front and rear elevations. One option for reducing the scale of large infill buildings is splitting the four large buildings (D1, E2, F2, and G2) into eight smaller buildings. We would like to see how this approach looks. By suggesting it, we are not automatically approving it. New buildings A1 and B1 are preferable in scale. Is it possible to introduce more of these units into the scheme in lieu of the larger units?

- Ft. Harrison is a campus of brick buildings; none of the infill designs feature masonry. Proposed infill designs using Hardie Plank-type clapboard and board-and-batten siding present too great a contrast with prevailing architectural precedent. We recommend brick cladding on elevations that face the parade grounds and/or historic buildings. Since brick is an expensive material, its use could be minimized in creative ways. Gable ends could be clad similarly to those on Building 35 using a Hardie Plank board-and-batten. Secondary elevations could be clad with traditional stucco of a brick-matching color.
- Architectural features and detailing on the infill designs do not reference those on the adjacent historic buildings. Differentiation should be subtle, not an open-ended proposition. We stress compatibility through simplified but meaningful versions of features and details on adjacent historic buildings. We recommend the following:
 - Masonry cladding;
 - Increased roof pitches and reduced overhangs;
 - Articulated gable ends;
 - A greater variety of historic cladding materials;
 - Windows with a vertical emphasis, an inset consistent with windows on adjacent historic buildings, and trim more substantially sized with a more traditional configuration;
 - Full-length or wrap-around porches with more substantial posts and beams;

Please feel free to contact me to discuss these comments.

Sincerely,

Pete Brown
Historic Architecture Specialist