

East Helena NRD Settlement Fund Early Restoration Proposal

Prickly Pear Creek Greenway Planning Project

July 2014

Prickly Pear Land Trust
P.O. Box 892
Helena, MT 59624



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Applicant Information and Project Summary Form

1. **Name of Applicant(s)** Prickly Pear Land Trust
2. **Project Title** Prickly Pear Creek Greenway Planning Project
3. **Type of Entity*** Non-Profit Corporation
(city, corporation, private individual, association, etc.)

(***Corporation** and **Foundation** applicants are required to submit corporation information as follows: Articles of Incorporation, and Certificate of Good Standing. **Partnership** applicants are required to submit a Partnership Agreement and a list of the names of the Partners. **Limited Liability Company** applicants are required to submit Articles of Organization, a list of the members/managers, and Certificate of Good Standing. **Non-Profit Associations** are required to submit a list of members, Articles of Incorporation and Certificate of Fact. **Non-Profit Corporations** are required to submit Articles of Incorporation and Certificate of Good Standing. **Please attach these documents to this form.**)

4. **Description of Project Location (Attach maps showing project area and project location per instructions under Technical Narrative (Step 3A))**
Prickly Pear Creek Corridor, upstream from East Helena to Montana City, and downstream to approximately the Helena Regional Airport.

5. **Injured Natural Resource(s) and/or Impaired Services to be Restored, Rehabilitated, Replaced or Equivalent Acquired through Project**
Public access to Prickly Pear Creek, increased opportunities for hiking, biking, fishing, bird watching, and educational activities along the creek and throughout the stream corridor, and ecological restoration of portions of the creek where it is deemed feasible.

6. **Authorized Representative:** Andy Baur Executive Director
(Name) (Title)
Mailing Address: PO Box 892
(Street/PO Box)
Helena, MT 59624 (406) 442-0490
(City/State/Zip) (Telephone)
Contact Person*: Andy Baur Executive Director
(Name) (Title)
Mailing Address*: PO Box 892
(Street/PO Box)
Helena, MT 59624
(City/State/Zip)
Phone: (406) 442-0490
E-mail Address: andy@pricklypearlt.org

(*For Corporate, Partnership, L.L.C., or Cooperative Association applicants, list Registered Agent and Office for Service of Process)

7. Proposed Funding Sources and Estimated Costs

On the table below, enter the source and amount of all funding that may be used for this project. Indicate all potential sources of funds that you intend to apply for this project, even if you have not yet applied for the funds or have not yet received a commitment from the source. Indicate whether matching funds are cash or in-kind.

Proposed Funding Source Form				
East Helena Settlement Restoration Fund			Amount in (\$) Dollars	Funding Percentage
			73,700	87.51%
Matching Funds				
Matching Fund Source	Cash Matching Fund	In-kind Matching Funds	Amount in (\$) Dollars	Funding Percentage
A	PPLT	9,200	9,200	10.92%
B	GETG	900	900	1.07%
C	Hydrometrics	424	424	0.50%
D				
E				
F				
Total Cash Match		0	----	Total Cash % → 0%
Total In-kind Match		→→→→→	10,524	Total In-kind % → 12.49%

Estimated Total Project Cost \$84,224

8. Private (non-Governmental) Applicant Financial Information

- a. Are there any lawsuits, judgments, or obligations pending for or against you? **No**
- b. Have you ever declared bankruptcy? **No**
- c. Are any of your tax returns delinquent or under dispute? **No**
- d. Any unpaid deficiencies? **No**
- e. Are you a party to a lawsuit? **No**
- f. Do you have any other contingent liabilities? **No**
- g. Do your current and deferred liabilities exceed the value of your assets? **No**

Explain all YES answers in a statement attached to this form.

9. Certification for Individuals or Private Entities

Individuals or private entities requesting funds must sign the following certification.

Certification for Individuals or Private Entities

I (We) the undersigned, have provided this financial information as part of my (our) application for an Early Restoration Proposal. I (We) certify that the statement is complete and accurate to the best of my (our) knowledge and I (we) authorize the State of Montana to investigate my credit worthiness and any of the matters described above.

Individual(s)

Andy Baur
Name Signature Date

Name Signature Date

Private Entities

Name of Authorizing Agent Federal Tax ID No. Signature Date

10. Authorizing Statement

An authorized agent/agents representing the applicant must by his/her signature indicate that the application for funds and expenditure of matching funds, as represented, is officially authorized.

Authorization

I hereby declare that the information included in and all attachments to this application are true, complete, and accurate to the best of my knowledge, and that the proposed project complies with all applicable state, local, and federal laws and regulations.

I further declare that, for Prickly Pear Land Trust (Project Sponsor), I am legally authorized to enter into a binding contract with the State of Montana to obtain funding if this application is approved. I understand that the Governor must authorize funding for this project.

Prickly Pear Land Trust
Project Sponsor Date

Authorized Representative (signature) Executive Director
Title

Fed Tax Id. No.

Proposal Abstract

Applicant Name: Prickly Pear Land Trust

Project Title: Prickly Pear Creek Greenway Planning Project

Project Description and Benefits to Restoration: Prickly Pear Creek begins in the Elkhorn Mountains and runs north along the Interstate 15 corridor, through Jefferson City, Clancy, Montana City and East Helena, before reaching the Helena Valley and flowing into Lake Helena. Since the mid-1800's, it has been impacted by mining activities, agriculture and development. Despite these impairments, the creek and its riparian area provide significant benefits, supporting populations of brown and rainbow trout as well as native fish species, many different birds and a multitude of other wildlife. In addition, the creek corridor offers a beautiful place to get away from urban life for fishing, walking and wildlife viewing. The stretch of Prickly Pear Creek from Montana City to East Helena is closely linked with both communities, and the restoration of lost services, including public access and recreational opportunities, as well as further ecological restoration, would provide great benefit to the local citizens of the entire region.

Many years ago, Ash Grove Cement Company in Montana City established the Sunderland Park and Trail to benefit area residents and offer a place for them to recreate and enjoy the outdoors. There is currently a little over a mile of trail in place along Prickly Pear Creek starting around the Ash Grove Plant headquarters and heading north. Prickly Pear Land Trust (PPLT) proposes the extension of this trail both south to the school at Montana City (and further, if possible), as well as north to East Helena and on to the airport where it would link to the existing trail. This trail extension could create at least seven miles of new trails, would link the communities of Montana City and East Helena, and tie into more than six miles of existing commuter trails, allowing for alternate ways to travel between all three towns, as well as creating longer loop trails. Due to the extensive riparian values, PPLT also proposes to analyze the reclamation opportunities along the corridor.

As the interim measures and final remedy are being planned and implemented now on the lands formerly owned by ASARCO, it is imperative that planning for a future greenway begin as soon as possible in order to coordinate this project with the ongoing work of the Montana Environmental Trust Group (METG) and U.S. Environmental Protection Agency (EPA). It will be far more cost-effective to plan the final remedy with the location of the greenway already established. Also, it is important to note that at present, there are very few landowners along the proposed corridor, which greatly improves the ease of negotiations. The more landowners and parcels there are, the longer and more expensive the process would be, so being able to act now is also very important from this perspective.

While PPLT has been informed that it will likely be three or four years until work could occur on the ground around the area of the South Plant and slag pile, other areas now owned by the METG may be able to support trail construction in the next year or two. PPLT would like to initiate the planning and visioning process for the trail corridor with the help of an engineering and planning firm. This will enable a more accurate and realistic potential route to be

established, as well as creating a plan to gather community input and support. The estimated cost for this planning process is \$75,000.

PPLT has discussed and gained initial support for this concept with a number of different groups and organizations, and potential partners including: Ash Grove Cement Company, the City of East Helena, METG, R & D Partners, the school districts of East Helena and Montana City, and the Helena Regional Airport. In the near future, PPLT plans to engage other potential stakeholders including the businesses and agencies in the Airport area and the Lewis & Clark County and Jefferson County Commissioners.

Technical Narrative

Applicant Name: Prickly Pear Land Trust

Project Title: Prickly Pear Creek Greenway Planning Project

A. Project Location – *Where is the project located?*

1. Please see attached maps.
2. The proposed Prickly Pear Creek Greenway will be a corridor located along, and including wherever possible, Prickly Pear Creek, from approximately the Helena Regional Airport upstream to Montana City. This includes the stretch that encompasses the former ASARCO East Helena Smelter.

B. Describe Project Need and Exigency/Define the Problem – *Why is there a problem?*

1. Specifically describe the problem that this project will address. What are the identified and potential causes of the problem or what circumstances precipitated the need for the project? Of these, what are the limiting factors – those factors that are most responsible for the causes of the current condition?

Prickly Pear Creek is an important amenity for the communities through which it flows. Currently, there is little access to the stream itself, and there are areas in need of restoration to provide a healthier creek. Without easy ways to reach the creek, the public is unable to enjoy the riparian area. This trail, or greenway, would provide needed access to the creek for recreation and education. In addition, it will serve as a transportation corridor for area communities that are currently only connected by highways that are unsafe for bicycle and pedestrian traffic.

The primary circumstance precipitating the need for this project is the ongoing work by the Montana Environmental Trust Group (METG) and the U.S. Environmental Protection Agency (EPA) to clean up the former ASARCO smelter site and surrounding lands. As the final remedies are being determined right now, it is highly important that this proposed greenway be designed in conjunction with the cleanup effort. This will both save money, and allow for the best possible use of space.

The limiting factors are the past industrial activities on the former smelter site, and the private ownership of the site and surrounding lands. Currently there are only four major landowners along the proposed 13-mile corridor providing an excellent opportunity to negotiate rights-of-way in an expedient manner. So far, all of these landowners are supportive of this proposal.

2. Which of these factors has been quantified and to what degree? Describe any uncertainty about the importance of these factors.

The EPA has thoroughly quantified the industrial activities at the former smelter site; there is no uncertainty regarding either that or the ownership patterns along the creek.

3. Describe any other ongoing or past efforts to address the needs of the project, including any unsuccessful past efforts.

To the best of our knowledge, there are no other prior or current efforts to plan for or create a greenway along the creek corridor.

4. Explain why your proposal is time critical and of great importance such that it merits an expedited funding decision ahead of completion of the restoration plan to be developed.

As mentioned above, due to the fact that the EPA is currently developing both interim measures and the final remedy for the ASARCO property, it is imperative that planning efforts for the proposed greenway project be coordinated with this work so that the best outcome for both can be achieved. This will result in cost savings as well.

C. Describe the Project Goals and Objectives – *What is the Proposal's Purpose?*

Note: The success of a project is determined upon achieving the stated goals and objectives. If possible, all goals and objectives should be measurable, either quantitatively or qualitatively. Under the Monitoring Plan (item D9), applicants are asked to address the link between the goals and objectives and the proposed monitoring tasks.

1. What are the goals of this project, or the problems you intend to solve through implementation of this project?

The goal of this project is to initiate the planning and visioning process for the future greenway. This will enable PPLT and its partners to create a plan to gather community input and support, and ultimately be able to increase public access to Prickly Pear Creek through the creation of new trails, as well as create new opportunities for residents and visitors to travel between East Helena, Montana City and Helena by non-motorized means for recreation, shopping, and commuting to jobs and schools.

2. What are the specific project objectives you plan to accomplish in order to achieve these goals?

PPLT intends to issue an RFP, and then hire a consulting company to conduct the necessary planning processes to determine the best and most feasible route for the future greenway, as well as community outreach to gather input and continue to build support for the concept beyond what PPLT has already done.

3. What quantitative and/or qualitative results, if any, will this project achieve?

The expected result is the final report from the consulting company that will guide development of the future greenway. This planning report will be thoroughly vetted by partner agencies, municipalities and landowners to ensure maximum support.

4. How will it improve injured natural resources or lost services?

This process will result in the creation of the future greenway extending from Montana City to East Helena and beyond to the Helena Regional Airport. This will result in considerably expanded public access to Prickly Pear Creek, with many new opportunities for recreation, as well as a new, non-motorized means of travel between the three communities for commuting, shopping and other purposes. In addition, the plan will identify areas in need of restoration, thus improving the function and quality of the stream and riparian corridor.

Note: A goal is a broad statement that identifies the desired future condition or end toward which an endeavor is directed. Objectives are descriptions of measurable outcomes or specific desired end points that are used to determine whether or not the goal has been successfully accomplished. Tasks are the steps needed to reach desired end points/future conditions. Goals and objectives are identified in this section of the Technical Narrative; tasks are identified under the next section.

**D. Describe the Project Implementation Plan – *How will the proposal be conducted?*
Describe in chronological order the individual tasks or activities necessary to accomplish the work under each objective.**

1. Describe the overall approach to project implementation, and generally describe how the project is capable of being implemented within 24 months of Trustee funding approval.

PPLT will issue an RFP, and hire a consulting group based on the best proposal. Then PPLT will work with the consultants to complete the scoping process and public outreach needed for a final report which will identify the best route for the future greenway. One of the required elements for whichever consulting group is hired is that they must be able to complete the necessary steps in 12-18 months.

2. Identify each of the project phases, and the specific tasks comprising each phase and relate them to the project goals and objectives. For construction projects, discuss each phase of construction, including any planning or design activities that must be completed before initiating any construction activities. Indicate the level of design that has been completed for the project (e.g., conceptual, 60%, 90%) that is the basis for construction cost estimates. Describe the tasks proposed to move from the current condition to the desired future condition and how the proposed tasks will impact the current condition in a demonstrable manner.

As stated above, the tasks involved include issuing an RFP, hiring the consulting company, and assisting them as needed to get to the final report. That report will allow PPLT to move forward with the creation of the proposed greenway, resulting in increased public access, recreation, transportation and restoration opportunities.

3. Identify the project staff for the particular tasks and quantify the staffing time necessary to complete the project.

The majority of the proposed work will be done by whichever consulting group is deemed to have submitted the strongest proposal in the RFP process. However, PPLT staff will be involved as well, including Executive Director, Andy Baur; Land Protection Coordinator, Andrea Silverman; Trails Director Corey Baker; and Conservation Director, Grant Bronk. Staffing time for PPLT is estimated at ten to twenty hours per week for the duration of the contract period.

4. Identify the contracted services necessary to complete the project. NRDP procurement guidance (<http://doj.mt.gov/lands/>) requires that most contracted services above \$5,000 be competitively bid. Indicate whether you have conducted the competitive procurement process for such services or plan to competitively bid such services after the Governor's funding decision.

As stated above, contracted services do constitute the majority of this work proposed for this phase of the project. PPLT plans to competitively bid such services after the Governor's funding decision has been made.

5. Identify any permits, regulatory approvals, or property access agreements that have been obtained or will be needed to complete the project. If you propose work on private land that will cause ground disturbance, provide an updated property ownership map and documentation of the landowner's consent to the proposed work that would disturb private land. Ownership information should be verified through the State Cadastral database (<http://nris.mt.gov/nsdi/cadastral>).

As the work proposed for this phase of the greenway is strictly planning, no permits or regulatory approvals will be required. It is likely that property access to private ground will be needed to adequately scope the proposed route for the greenway and restoration projects, but the private landowners along the projected path of the greenway have already been contacted preliminarily, and will be engaged in the planning process.

6. Indicate whether the project is a phase of a larger project for which additional funding is needed and, if so, the targeted funding sources. Examples include a stream restoration project on a particular reach that is one part of an entire stream restoration effort.

This project is the planning phase for the proposed future greenway, so there is an anticipated need for additional funding in the future for engineering and construction.

However, it is too difficult at this point to estimate what the future costs will be until the scoping work and planning report are completed.

7. Describe the measures that will be undertaken to ensure long-term effectiveness.

a. Describe the measures that will be undertaken to ensure that the intended resource improvements will be maintained in the long-term. If the work will occur on private land, explain what measures will be used to assure that future land management activities will not disrupt areas that will be restored and/or diminish the projects benefits. Include documentation of the current landowner's commitment to conduct these measures. For additional guidance on this issue, please consult the NRDP's "Guidance for Work on Private Lands," which is available upon request or from the NRDP website.

As this project requests funding for the planning phase, this is not relevant at this time, but will certainly be addressed in any future requests that involve on-the-ground work.

b. For aquatic and terrestrial construction projects, identify the service life of the proposed improvements, indicate what routine maintenance will be performed to upkeep the improvements in the long-term, and indicate what entity is committed to performing and funding these routine maintenance activities. Provide documentation, such as a letter, from that entity verifying this future commitment.

Provisions for maintenance will be addressed in the planning document.

8. Describe Methods and Technical Feasibility of the Proposed Project.

a. Provide a detailed description of methods to be used to conduct specific tasks, including appropriate citations/documentation. **This will be addressed in the planning and/or engineering process.**

b. Describe how this approach has been used successfully to address similar problems, if it has. **N/A**

c. What are the certainties and uncertainties associated with any innovative approaches to the proposed project? **This proposed greenway will cross through two counties, two incorporated cities and unincorporated communities and private land. The plan will have to address the intricacies of these political boundaries and the needs of private landowners.**

d. Are there any uncertainties in the proposal that require further resolution? Please discuss these uncertainties, including uncertainties associated with a proposal that is based on a conceptual design. **This plan will need to consider and integrate planning issues related to the East Helena/ASARCO reclamation project. Trail routing and other activities will be dependent on the restoration activities at the ASARCO site.**

e. Are there any data gaps and how do you propose to address them? **This planning phase of the greenway should eliminate any data gaps.**

f. Describe any potential complications and how they may affect the implementation time schedule. **No complications are foreseen at this time.**

9. Describe the Monitoring Plan.

While the importance of monitoring is undeniable, because this phase of the project is for planning alone, it is not applicable at this time. Once on-the-ground work has been completed, a monitoring program will begin.

E. Provide a Project Time Schedule – *When will the proposal be done?*

The anticipated project time schedule is as follows:

1. Immediately after notification of an award from the NRD Early Restoration Program, PPLT would send out a request for proposals.
2. The best proposal would then be selected, and a contract with the consulting firm would be signed by both parties; expected date (depending on date of award): Fall 2014.
3. The consulting firm would complete all necessary work with the final report submitted by Spring 2016 or earlier.

F. Describe Qualifications of the Project Team – *Who will be conducting the work?*

A large portion of this will be determined by the RFP, which will be used to decide which consulting group will be hired to do the planning work. For PPLT, Executive Director, Andy Baur, has extensive experience administering contracts as well as developing proposals for trails and greenway. Andy has been the Executive Director of PPLT since 2001. PPLT is fully staffed with conservation professionals and administrative staff.

G. Provide Supporting Technical Documentation

References, literature citations, unpublished materials relevant to the technical feasibility of the project, and copies of easements, right-of-way, etc. pertinent to the project and technical approach will all be provided as part of the planning process.

Environmental Impact Checklist and Narrative

Applicant Name: Prickly Pear Land Trust

Project Title: Prickly Pear Creek Greenway Planning Project

PPLT has determined that there would be no impacts whatsoever from the project that might result from this proposal, as it will simply be a planning process and outreach to the communities. If in the future the next step is reached, and the greenway is created, there are numerous potential benefits that would result, such as improved air quality from trips taken on foot or via bicycle instead of in a motor vehicle; protection of various species and habitats; and increased access to recreational opportunities and open space.

Environmental Impact Checklist

Impacts to Physical Environment	No Impact	Potentially Adverse	Potentially Beneficial	Permits or Approvals Required	Mitigation Required
1. Soil suitability, geological or topographic constraints	x				
2. Air quality	x				
3. Groundwater resources and quality	x				
4. Surface water quality, quantity and distribution systems	x				
5. Floodplains and floodplain management	x				
6. Wetlands protection	x				
7. Terrestrial and avian species and habitats	x				
8. Aquatic species and habitat	x				
9. Vegetation quantity, quality and species	x				
10. Unique, threatened or endangered species or habitats	x				
11. Unique natural features	x				
12. Historical and archeological sites	x				
13. Aesthetics, visual quality	x				
14. Energy resources, consumption, and conservation	x				

Impacts to Physical Environment	No Impact	Potentially Adverse	Potentially Beneficial	Permits or Approvals Required	Mitigation Required
15. Human Health and Safety	x				
16. Agricultural production (grazing, forestry, cropland)	x				
17. Access to recreational activity, public lands, open space	x				
18. Nuisances (odor, dust, glare)	x				
19. Noise (e.g. separation between housing and construction areas)	x				
20. Hazardous substance handling, transportation and disposal	x				
21. Local and state tax base and tax revenue	x				
22. Employment, population, or housing	x				
23. Industrial and commercial production	x				
24. Land use compatibility; consistency with local ordinances, or solutions, or plans	x				
25. Demands for governmental services (e.g., site security, fire protection, community water supply, wastewater or stormwater treatment, solid waste management)	x				
26. Transportation networks and traffic flow	x				
27. Social structures and mores	x				
28. Cultural uniqueness and diversity	x				

Comments: Again, there will be no impacts as a result of this project.

Criteria Statements

Applicant Name: Prickly Pear Land Trust

Project Title: Prickly Pear Creek Greenway Planning Project

1. RELATIONSHIP OF EXPECTED COSTS TO EXPECTED BENEFITS

A. Describe and, if possible, quantify the direct and indirect costs of the project.

The direct costs of this project are simply those involved with contracting the work to assess the feasibility, best location and engineering work needed to create the greenway; there are no anticipated indirect costs.

B. Describe and, if possible, quantify the direct and indirect benefits of the project

1. Describe direct and indirect benefits to injured natural resources located within the vicinity of the Former ASARCO East Helena Smelter.

Through the proposed greenway project, any number of restoration projects along Prickly Pear Creek may take place in the future, but this proposal is for scoping work alone, not any direct restoration work.

2. Describe direct and indirect benefits to lost services or replacement services, including any increased public access provided by the proposal. If possible, quantify the number of public users that will benefit from the improvements associated with the proposal.

This project would offer many direct benefits to lost services through providing increased access to Prickly Pear Creek and its riparian area for hiking, biking, fishing, bird watching, educational activities, and more. Lost services related to ecological uses of the creek and riparian area would also be restored through any restoration projects that are identified by the planning process. Potential public users include all of the residents of Montana City, East Helena, and Helena (both the city and valley residents), as well as visitors from other areas. It is anticipated that this will be a very popular amenity for area residents and visitors.

3. Describe other direct and indirect public benefits.

Besides the restoration of lost access to the creek, the proposed greenway will provide several other indirect public benefits. A safe means of travelling between the three communities for work, school, shopping and recreational opportunities will become available. Many people are looking for trails closer to their home who do not live within easy distance of the trailheads in the South Hills of Helena; the greenway will offer this for new communities. The greenway also offers an alternative trail experience from the more technical trails in the South Hills, allowing for use by young children, disabled people and seniors. There are public health benefits from increased physical activity and commuting by non-motorized means as well.

C. Indicate the timeframe over which these identified benefits are expected to accrue.

The benefits would accrue as soon as the proposed greenway is in place, and would continue for as long as it exists. If the project is constructed in phases, even partial segments will benefit citizens immediately.

2. COST-EFFECTIVENESS

This statement should include information regarding whether a particular project accomplishes its goal in the least costly way possible compared to alternatives. In applying this criterion, the State will consider all the benefits and costs associated with a project compared to alternative solutions. The descriptions of each alternative do not have to be as detailed as the description of the proposed project, but enough information must be provided to demonstrate that the alternatives to the project were investigated and that the proposed project provides either greater benefits at the same or similar costs or similar benefits at a lower cost.

A. Describe the alternatives that will accomplish the same or substantially similar goals as that of the proposed project. These alternatives could accomplish the goals of the proposed project, but in a different way, under a different time frame, or with different costs and benefits. A discussion of a minimum of two to three alternatives is expected. Include the no action alternative (i.e., natural recovery), if applicable; however, in most cases the no action alternative would not accomplish project goals.

- 1) **No action alternative:** None of the benefits described above could be achieved. The lack of a plan means that there would be no process to determine feasibility, and no integration with the EPA, METG, or other groups.
- 2) **Plan for on-street or highway routes:** This alternative might be able to provide on-street bike lanes and other options, but this would be unsafe for children, and intimidating for inexperienced cyclists. There would also be little or no creek access for recreation, nor any stream restoration projects under this alternative.

B. Compare the benefits and costs of each of the alternatives and provide justification for the selection of the preferred alternative. Provide any information on the cost-effectiveness of implementation as an Early Restoration action rather than upon completion of the restoration plan. Costs of the alternative approaches should be detailed enough to compare to costs of the preferred alternative provided under Step 6. If you have a project for which such a detailed cost comparison of approaches is not feasible, such as a land acquisition project, then explain such limitations to comparing alternatives.

Based on the alternatives outlined above, it is clear that the preferred alternative proposed by PPLT will accomplish far more from both a community and ecological perspective. As stated before, it will also be far more cost effective to complete this planning phase now, in conjunction with the work of the EPA and METG to determine the final remedy for the former ASARCO site, so there is great value in implementing this planning work as an Early Restoration action instead of waiting until a later date.

C. If the alternative selected is not the lowest cost alternative or does not provide the greatest net benefit of the alternatives analyzed, provide the reasons for the selection of this alternative.

While completing the entire planning process for the proposed greenway will clearly cost more than either no action or merely creating on-street routes, the resulting benefits from the former are equally clear. The planning process will create the blueprint that will allow for the creation of the greenway, which will be far safer and more useful for more people than simple on-street bike routes, and

stream restoration will also allow for important ecological benefits. An again, completing the planning process in coordination with the EPA and METG's ongoing work will also result in significant savings, as well as a better outcome overall.

D. Identify project matching funds, if any, to be used directly on the selected alternative.

PPLT anticipates a contribution of \$9,990 in matching funds to be used directly on the preferred alternative.

3. ADVERSE ENVIRONMENTAL IMPACTS

This criterion is addressed under Step 4 in the Environmental Checklist and Narrative; therefore, no additional response is required here.

4. RESULTS OF RCRA/SUPERFUND RESPONSE ACTIONS (Readily Available Information)

This statement should include a discussion of the results or anticipated results of RCRA/Superfund response actions (defined on p. A-1) underway, or anticipated, in the East Helena NRD Settlement that are relevant to the proposed project. Application of this criterion will require the State to assess, given the inherent uncertainties associated with this task, what response actions it will entail and to make projections as to their effects on resources and services. The State will evaluate what is necessary in the way of restoration of resources and services in light of ongoing and planned response actions and evaluate the degree of consistency between a proposed project and response actions. Projects that duplicate or may duplicate the effects of a response action on natural resources or services will be disfavored. Projects located where the remedial design has not been completed will also be disfavored if a potential exists for the proposed restoration activities to be accomplished under remediation or to interfere with proposed remediation.

Given the multiple response actions underway or anticipated and multiple entities involved in those response actions, it may be difficult to address this criteria. Therefore, applicants are requested to provide readily available information they have on this criterion and the State will collect any necessary additional information.

A. Identify and describe any ongoing and planned response actions of which you are aware that affect or may affect the natural resources or services addressed by your proposal.

One of the major reasons why PPLT feels that it is so important to move forward at this time with the planning process for the greenway is because the EPA is still developing some of the interim measures, and most importantly, the final remedy for the former ASARCO site. It makes the most sense both logistically and financially to design the proposed greenway in concert with the EPA and METG so that our actions can be coordinated. This avoids any duplication of efforts to provide increased public access and opportunities for recreation, and will hopefully provide the most benefit possible in the most efficient way.

B. Describe how the proposal coordinates with ongoing or planned response actions of which you are aware.

1. What steps are included to account for ongoing or planned response actions?

The consulting group hired to do the planning and outreach work will be required to work with the EPA and METG to coordinate the proposed greenway with all relevant ongoing or planned response actions. For example, the future trail might not run over the evapotranspirative cover that will be put in place if that isn't deemed a compatible use.

2. Does your proposal augment an ongoing or proposed response action? If so, how?

Again, the main intent of moving forward with the planning process for the proposed greenway now is so that the work can be coordinated with the ongoing and future efforts of the EPA and METG.

3. Will implementation of your proposal in any way require that ongoing or proposed response actions be altered?

This is a possibility if it is determined that that would be the best way to design the greenway and move forward toward the goals of the final remedy.

5. RECOVERY PERIOD AND POTENTIAL FOR NATURAL RECOVERY (Readily Available Information)

The applicant should evaluate whether the resource and/or services their proposal addresses can recover naturally and estimate how long natural recovery would take. This analysis will help to place the project's benefits in perspective by comparing the length of time it will take for the resource and/or services to recover if the project were implemented compared to the "No Action-Natural Recovery Period" alternative (defined in Attachment A).

The State recognizes the difficulty some applicants may have in predicting the timeframes for recovery to baseline conditions with the project and without any additional action beyond remedy. Provide time ranges (e.g., 1-10 years vs. 10-50 years vs. 50-100 years, or longer) and identify any uncertainties. Applicants are requested to provide readily available information they have on this criterion and the State will collect any necessary additional information.

A. Evaluate the potential for natural recovery of the natural resource and/or services addressed by your proposal.

There is no way to "naturally" increase public access and recreational opportunities – any remedy will involve human decision making, not an ecological process.

B. Describe how your proposal would enhance the time frame for natural recovery.

Please see above answer.

6. FEDERAL, STATE, AND TRIBAL POLICIES, RULES AND LAWS (Readily Available Information)

A. Identify any permits or other regulatory approvals that have been obtained and those that must be obtained to complete the project, and include pertinent dates. There are no permits or regulatory approvals that need to be obtained, as far as PPLT is aware.

B. Discuss coordination with local entities.

1. What efforts have been made to contact local governmental entities regarding the project? PPLT has made presentations about the proposed greenway project to the City of East Helena, the superintendents of East Helena and Montana City schools, and the East Helena Entire Cleanup Team in Coordination (EHECTIC); all were very much in favor of the idea. In addition, PPLT has provided informal information on this proposal to the City of Helena and Lewis & Clark County Commissioners.

2. What specific measures will be taken to ensure that the project is coordinated with local governmental activities and complies with local governmental requirements? This is one of the areas that the hired consultants will address.

3. If your project involves land management activities, explain how you have or will meet the state and local weed management requirements and what efforts you have made or will make to coordinate with the local Weed Control District. This is one of the areas that the hired consultants will address.

C. Discuss how the proposal is affected by and is consistent (or inconsistent) with any other applicable laws and rules, policies, or consent decree requirements of which you are aware. If necessary, the State will supplement information provided by applicants. N/A

7. NORMAL GOVERNMENT FUNCTIONS

A. Describe what proposed activities, if any, are those for which a governmental agency is legally or otherwise would normally be responsible for, or for which a governmental agency could receive funding in the normal course of events. None.

B. If your project augments funds normally available to government agencies, explain why the project cannot be implemented without Restoration funds. N/A

Proposal Budget

Application		Budget Summary Form				
Expense Category		East Helena NRD Settlement Restoration Fund	Matching Funds			Total
			Cash	In-Kind	Subtotal	
1	Salaries and Wages	6,200	0	7,524	7,524	13,724
2	Fringe Benefits	0	0	0	0	0
3	Contracted Services	63,000	0	0	0	63,000
4	Supplies and Materials	0	0	500	500	500
5	Communications	2,000	0	0	0	2,000
6	Travel	500	0	0	0	500
7	Rent and Utilities	0	0	500	500	500
8	Equipment	0	0	0	0	0
9	Miscellaneous	2,000	0	2,000	2,000	4,000
Total		73,700	0	10,524	10,524	84,224

Application		Budget Detail Form				
Expense Category		East Helena NRD Settlement Restoration Fund	Matching Funds			Total
			Cash	In-Kind	Subtotal	
1	Salaries and Wages (List all worker salaries)	6,200	0	7,524	7,524	13,724
	Salaries and Wages Subtotal	6,200	0	7,524	7,524	
2	Fringe Benefits	0	0	0	0	0
	Fringe Benefits Subtotal	0	0	0	0	
3	Contracted Services (List by Type)	63,000	0	0	0	63,000
	Contracted Services Subtotal	63,000	0	0	0	
4	Supplies and Materials	0	0	500	500	500
	Supplies and Materials Subtotals	0	0	500	500	
5	Communications	2,000	0	0	0	2,000
	Communications Subtotal	2,000	0	0	0	
6	Travel	500	0	0	0	500
	Travel Subtotal	500	0	0	0	
7	Rent and Utilities	0	0	500	500	500
	Rent and Utilities Subtotal	0	0	500	500	
8	Equipment	0	0	0	0	0
	Equipment Subtotal	0	0	0	0	
9	Miscellaneous	2,000	0	2,000	2,000	4,000
	Miscellaneous Subtotal	2,000	0	2,000	2,000	
All Categories Subtotal		73,700	0	10,524	10,524	84,224

Budget Narrative

Applicant Name: Prickly Pear Land Trust
Project Title: Prickly Pear Creek Greenway Planning Project

The proposed budget reflects PPLT's efforts to project estimated costs for the Greenway Planning Project. PPLT projected its hours and costs based on the time we foresee putting in for the duration of this project. These costs for PPLT's time would be for staff to coordinate with the contractor, attend meetings, make presentations and provide support for other organizations and entities involved in the project.

For the estimated costs for contractor services, PPLT contacted a reputable engineering firm with extensive experience in greenway planning and engineering to get the most accurate estimate. Exact contract costs will be determined upon award of a contract.

No administrative, overhead or indirect fees will be charged for this project, nor will there be any design/contingency costs related to construction. No equipment expenditures are anticipated through this grant.

PPLT will expend funds on major office supplies and will include these expenditures as in-kind contributions. They would include costs associated with printing (ink, paper, copying, etc. The yet to be hired contractor will have its own supply budget which will be included in the contract cost. PPLT estimate \$500 for this category.

For communications, \$2,000 is requested. This will allow PPLT to create materials such as mailings and brochures to provide outreach and information to its members and the community at large. PPLT also requests \$500 for travel, which will cover vehicle use and travel between PPLT's office and the project site, as well as associated meetings. Some meetings may take place in Boulder (seat of Jefferson County) or other towns in Montana that require additional mileage. PPLT estimates \$2,000 for miscellaneous items related to this project. This may include extra travel expenses, appraisals of property, meeting space rental and associated costs.

PPLT attempted to be as conservative as possible in these estimates. However, if there are costs overruns, PPLT will work with the contractor and NRD to determine the best path forward to cover such overruns.

Matching Funds: All of the matching funds (so far) are derived from time and equipment provided by PPLT and the METG. PPLT is committed to dedicating staff resources to this project, as it is major portion of the PPLT's program initiatives for the next three to four years. PPLT will create a class code in its financial tracking program to accurately track time spent on this project for reporting purposes.

PPLT Estimated Time/Costs

Employee	Hours @rate	Cost/Employee	In-kind	NRD funds Requested	Total
Andrew Baur, Executive Director	100 hours @ \$50/hour	\$5000	\$2500	\$2500	5,000
Grant Bronk, Conservation Director	40 hours @\$40/hour	1600	800	800	1,600
Andrea Silverman, Land Protection Coordinator	140 hours @ \$35/hour	4900	2450	2450	4,900
Corey Baker, Trails Director	12 hours @ \$35/hour	420	210	210	420
Claudia Davis, Administrative Services	20 hours @ \$24/hour	480	240	240	480
Totals		12,400	6,200	6,200	\$12,400

*Clerical, bookkeeping, and other support staff services that would be reimbursed by East Helena NRD Settlement Restoration Funds

GETG Estimated Time/Costs

Employee	Hours @rate	Cost/Employee	In-kind	NRD funds Requested	Total
Cynthia Brooks, President	4 hours @ \$225/hour	\$900	900		900
Mark Rhodes, Hydrometrics	4 hours @ \$106/hour	\$424	424		424
Total		1324	1324		\$1,324