CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	1539 11th Avenue, Helena, Montana – Commercial Trust Lands Ground Lease
Proposed Implementation Date:	Ground Lease – Fall 2014
Proponent:	DNRC, MSU & UM Trust Beneficiaries
Location:	1539 11th Avenue, Helena, Montana
County:	Lewis & Clark County
Trust:	MSU (50%) & UM (50%)

I. TYPE AND PURPOSE OF ACTION

The Department of Natural Resources and Conservation (DNRC) is proposing to lease a commercial trust land property located in Helena, Montana, at 1539 11th Avenue whereby the lessee would develop a commercial space to be leased back to DNRC for office space.

The property was previously owned by the Montana Department of Administration (DOA). Discussions of DNRC acquiring the property from the DOA began in 2010. At that time the site had been vacant since the last tenant, the Department of Corrections, had left the building due to ongoing issues with moisture, mold, and inadequate heating/cooling systems. Two appraisals were completed for the property. Those appraisals conclude that the value of the land was worth more than the land with the existing structure. The value of the existing structure was a negative value contribution to the total property value. Because the negative value influence of existing structure, the DOA and DNRC recommended that the cost to the DNRC to acquire the property would be the appraised value minus the cost of demolition.

In December of 2012, the Montana Board of Land Commissioners (Land Board) approved the administrative transfer of the property from DOA to DNRC at the appraised value minus the cost of demolition.

Starting in March 2013, DNRC worked with DOA to draft a Request for Proposals for 1.) a ground lease of the site and 2.) a developer to provide office space on the building that DNRC would lease – whether that be through renovation of the existing building or demolition and construction of a new building.

In December of 2013, a second appraisal was conducted and indicated that the value of the land was worth more without the encumbrance of the existing structure.

In May of 2014, DNRC sent a letter to the Montana State Historic Preservation Office (SHPO) notifying them that DNRC recognized Mills Hall as a Heritage Property, and providing them a copy of the Montana Cultural Resources Information System site form. The letter also outlined the planned commercial ground lease of the site, to the benefit of MSU and UM, and identified the possible outcome that the highest and best use of the site may require demolition of Mills Hall.

In August, 2014, one proposal was submitted by Dick Anderson Construction. The proposal covered the demolition of the existing structure and the construction of a new three story office building with a two story parking structure.

In September of 2014, DNRC sent a follow-up letter to SHPO notifying them that only one response to the RFP was received with the proposal to demolish Mills Hall and redevelop the site with an office building and parking structure.

The commercial ground lease is authorized under MCA 77-1-901 through 912, and revenues generated from the ground lease would benefit MSU & UM Trust Beneficiaries.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project.

A public notice was published in the Independent Record on October 3rd, 12th, and 19th, on the DNRC Public Notice website @ http://dnrc.mt.gov/PublicInterest/Notices/Default.asp, and mailed to interested parties in October 2014. DNRC received 5 responses to the public notice. Two comments expressed concern regarding the conceptual development's layout and three comments expressed opposition to the proposed demolition of Mills Hall. DNRC responses to public comments can be found in Attachment A.

Other entities that were scoped include the Montana Department of Administration (DOA) and the State Historic Preservation Office (SHPO).

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

Prior to signing a commercial ground lease on this tract, DNRC would ask the Montana Board of Land Commissioners for approval of the lease proposal. The Land Board has decision making authority relating to Trust Lands actions.

The Montana DOA , General Services Division , Procurement Bureau is responsible for overseeing the Request for Proposal process, used to select the lease proposal that best meets the requirements of the issued RFP.

Upon acquiring a ground lease, the developer (Dick Anderson Construction) would go through the City of Helena for all required demolition and construction permitting. The DNRC would also apply for a permit from the SHPO for the demolition of a state heritage property. The developer would also be responsible for all other development-related permits, including the Montana Department of Transportation for any proposed changes in traffic approaches and the Montana Department of Environmental Quality for regulatory authority for removal of hazardous wastes, and any other required permits for engineering and building.

3. ALTERNATIVES CONSIDERED:

Alternative A (No Action) – Under this alternative, the State retains the existing land and unoccupied building, in its current status. The No Action alternative would result in the continued vacant "mothballed" status of Mills Hall. Trust Land beneficiaries would continue to receive no financial returns from the property.

Alternative B (the Proposed action) – Under this alternative, the Department would request and recommend approval by the Land Board to lease the tract encompassing approximately 1 acre. If approved by the Board, the tract would be leased to Dick Anderson Construction per their response to Request for Proposal #14-2855A, released by Department of Administration on May 9th, 2014. The new commercial ground lease would authorize the lessee to redevelop the site for professional office space. Redevelopment would include demolition and removal of the current structure on the lease site. The income from the lease would be distributed to the beneficiaries of the MSU and UM trusts. This lease will initially generate a total of $45,000 in annual revenue for these beneficiaries, or 6.7% of the current appraised asset value. The lease payments will escalate over the term of the lease.

Alternatives Considered but Dismissed – In developing the Request for Proposals to lease the commercial lot, DNRC did not preclude the option to renovate the existing building. However, no proposals came forth that considered this option, and no laws currently require DNRC or the proponent to consider renovation as the only alternative.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.

The lease tract is an existing developed site. The action alternative would require removal of existing pavement and some fill material and soil before new permanent structures are installed. The net result would be the same in terms of soil – the site would again be mostly paved or covered with structures, so there should be little net change in soils conditions. Any site work and construction done by the lessee would be in accordance with City of Helena building and zoning codes. The lessee would perform all necessary geotechnical testing and reporting required by the City of Helena.

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:

Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.

No water rights or well logs exist for this parcel, and no surface water exists. Supply and waste water, along with storm water runoff, would be administered by the Helena Public Works Department.

The CITY OF HELENA GROWTH POLICY; Adopted May 9, 2011; CHAPTER 5, PUBLIC FACILITIES AND SERVICES states:

Currently the 2008 Wastewater Collection System Plan indicates there are no capacity issues for present and near-term flows, but the collection system is projected to be at or above 75% capacity by 2025.... As development occurs, the system will protect the public health, safety, and welfare by providing for safe treatment and disposal of wastes.

Based upon the 2005 Water Distribution and Facility Plan, the projected demand for water would be approximately 15 mgd in 2025. The City currently treats enough water to meet present demand and has reserved enough capacity to meet the demand of future growth.

City's 2010 Stormwater Ordinance provides guidance and outlines restrictions for managing runoff quantity and quality of existing systems and new development. The ordinance regulates land-disturbing activities that create soil erosion, sediment, and runoff during construction activities.

In either the No Action or the Action Alternative, no significant impact would occur to water quality, quantity or distribution.

6. AIR QUALITY:

What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.

The proposal does include demolition and construction activities during the initial redevelopment stage. Demolition would be done in compliance with Helena City Codes and City Engineering Standards requirements, as well as Montana Department of Environmental Quality regulations. After construction is complete, the daily activities on site would be the same as previous uses, including light automobile traffic. No significant effects to exterior air quality would occur as a result of the proposed action.

The existing Mills Hall structure has developed some measurable levels of various mold spores within the ground level, as reported on more than one occasion over the past thirteen years. While the previous property owners did attempt remediation, the lower level of the structure was eventually vacated due to poor air quality

and eventually was a factor in the decision to sell the property. The planned office building will have a modern HVAC system, ensuring energy efficient heating, cooling, and indoor air quality. The proposed action would result in a long term improvement in the interior air quality for human occupation.

7. VEGETATION COVER, QUANTITY AND QUALITY:

What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.

No native vegetation exists on site as it is an existing developed commercial parcel. Removal of existing lawn and trees would be required during construction, but the site will be landscaped after the completion of construction. No cumulative effects to vegetation will result from the proposed action.

8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:

Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.

The site is currently a developed commercial property in an urban location. Montana Fish, Wildlife and Parks staff have inspected the site and determined the existing building is being used by little brown and big brown bats. FWP's recommendation is to deconstruct the building during the time when the building is not inhabited, November 1 through mid-April.

No cumulative effects to fish and wildlife would result from the proposed action.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:

Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

The site is currently a developed commercial property in an urban location. It is surrounded by existing commercial development, and does not provide habitat for any threatened, endangered, or species of special concern.

The proposal does not include any activities which would alter any habitat; no cumulative effects are expected in either alternative.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

Identify and determine effects to historical, archaeological or paleontological resources.

Mills Hall has been formally recorded and evaluated per the mandates of the Montana State Antiquities Act (22-3-421 *et seq.* M.C.A.), and the DNRC's Administrative Rules (A.R.M. 36.2.801-813) that implement the State Antiquities Act. As directed at A.R.M. 36.2.803, the DNRC Initiated consultation with the State Historic Preservation Officer (SHPO) early in the planning process by:

1) identifying Mills Hall as a cultural resource,
2) formally recording Mills Hall on a SHPO approved Cultural Resources Inventory System (CRIS) form (this level of documentation includes a comprehensive history, high resolution color photographs of the interior and exterior, technical plan drawings on a floor by floor basis, and a color topographic map with legal location identified),
3) evaluating the significance and integrity of Mills Halls in conjunction with the SHPO based on established National Register of Historic Places protocol,
4) identifying a proposed DNRC action (demolition or rehabilitation) that would "effect" the existing structure, and
5) on-site visit with SHPO staff and consideration of SHPO comments and recommendations concerning DNRC's conceptual plans to either rehabilitate or demolish and rebuild Mills Hall for office space.

Through formal consultation between the DNRC and the SHPO, Mills Hall has been identified as a cultural resource worthy of preservation and potentially eligible for listing the National Register of Historic Places (i.e., a state Heritage Property).

Several opinions have been obtained from contractors as to what it would require to renovate the existing structure to modern efficiency and quality standards while maintaining its historic appearance. A public request for redevelopment proposals went out in early 2014, and no proposals to renovate Mills Hall were received.

The action alternative as proposed will involve demolition of Mills Hall and construction of a new office building of modern materials and contemporary design. Although the DNRC recognizes the structure as a State Heritage Property, there are no authorities that preclude the State or a lessee from removing the structure. Likewise, the structure is not on the National Register of Historic places nor is it in a Historic District in the City of Helena.

The no-action alternative leaves Mills Hall intact. However, no maintenance or upgrades to Mills Hall will occur because of a lack of funding and resources. Under a no-action alternative, and with no available funding for on-going upkeep, Mills Hall will continue to deteriorate and eventually pose a liability to the State of Montana as it becomes a safety hazard.

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11. AESTHETICS:

Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.

The proposed lease site is in a commercially zoned neighborhood, in an urban area, redevelopment with a new office structure and parking structure would comply with City of Helena regulations for setbacks and height restrictions. The neighborhood has seen some redevelopment to the west of the site including OPI buildings, Safeway, and Walgreens.

Mike Joki in his appraisal describes the subject's neighborhood as*: Over the past 10-15 years this neighborhood was going through a revitalization cycle with many of the older properties being remodeled or removed and developed with a higher and better use… New construction within the neighborhood has transpired by razing existing properties to make way for new buildings… The Capitol Hill Mall considered the hub of this neighborhood for many years has steadily been losing its tenants and is nearing a change in use. It is expected that the land that supports the Capital Hill Mall will be redeveloped to its highest and best use once the building improvements are no longer being used, which is similar to the scenario at the subject property.*

The proposed redevelopment of the site would make better utilization of the site, allowing the property to better compliment the redevelopment occurring in the neighborhood, and will allow beneficiaries to receive a better return for the ground lease.

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

Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.

Development of the parcel would be regulated by applicable state and local regulations.

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13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:

List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

No other studies, plans or projects on this tract exist, the lease proposal being evaluated is the only proposal received by the DNRC. There are not any future proposed state actions in the analysis area that are under

MEPA review (scoped) or permitting review by any state agency. There are no determined cumulative impacts likely to occur as a result of the proposed action.

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

14. HUMAN HEALTH AND SAFETY:

Identify any health and safety risks posed by the project.

A hazardous materials inspection report on 1539 11th Avenue, Helena, MT completed by A.L.M. Consulting, LLC on December 7, 2011, identified potential asbestos-containing materials, lead based paint, and mold in the existing structure.

Under the proposed action, demolition and construction activities during the initial redevelopment stage would be done in compliance with Helena City Codes and City Engineering Standards requirements, as well as Montana Department of Environmental Quality, Asbestos Control Program regulations and permitting. The proposed new office structure will be built to current building codes and offer a modern, safe work environment.

No impacts to human health and safety would occur as a result of the proposal.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:

Identify how the project would add to or alter these activities.

The proposed action would provide additional needed commercial office space in the capitol complex area. Once completed, this development would provide office space for approximately 115 full time state employees within the immediate area around the capitol. This will be a beneficial impact, as it will reduce the amount of car use for inter-agency meetings on a day to day basis. There will be no effect on agricultural activities and production, as the lease site is already urban, commercially zoned land, and no agricultural land will be impacted.

No direct or cumulative impacts are anticipated as a result of the proposal.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:

Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.

The proposal would have an immediate effect to the employment market during the demolition and construction phases of the project. Dick Anderson Construction would employ 25 construction workers, for 18 months, during the construction of the office building and parking facility. Ongoing management of the property would also provide additional employment opportunities for property management and maintenance.

The proposed action would have a beneficial effect to the area employment market.

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:

Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

Currently the entire property is owned by the State of Montana and is property tax exempt.

The lease proposal is for redevelopment of the site with a privately owned office building and accompanying parking structure. The improvements would be taxable improvements to real estate, and the land would be taxable under MCA 15-24-1203, Privilege tax on industrial, trade, or other business use of tax-exempt property – exceptions.

An estimate of potential taxes that would be generated from the lease and redevelopment of the site, based on 2014 taxes on comparable commercial properties in Helena, would be in the neighborhood of $80,000 for the improvements and land (taxed under MCA15-24-1203).

The proposed action would have a positive effect on the property tax base and revenues.

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18. DEMAND FOR GOVERNMENT SERVICES:

Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services

Montana Department of Transportation, Traffic Data Collection & Analysis (TDCA) section, compiles Annual Average Daily Traffic (AADT) counts, which estimate the traffic volume one can expect to see on the roadway segment on an average day. There are two traffic counts sites within the vicinity of the proposed lease site: SiteID 25-7c-17, located on 11th avenue between N. Lamborn and N. Oakes, and Site ID 25-7c-15, located on 11th Avenue between Montana Ave. and Washington Dr.

AADT counts for SiteID 25-7c-17 in 2010 were 14,600 vehicles and in 2013 were 13,010 vehicles.
AADT counts for SiteID 25-7c-15 in 2010 were 13,080 vehicles and in 2013 were 10,980 vehicles.

The current structure on the lease site is unoccupied; there currently is no traffic from workers traveling to and from the building during the work week. The proposed office building would be occupied by 115 workers traveling to and from the building during the work week, plus additional visitor traffic. Access to the site would be provided from 11th Avenue and 9th Avenue. The action alternative could potentially create a less than 2% increase in AADT counts on 11th avenue, however until the site was vacated in 2010 the traffic already existed from 100 employees that occupied the existing structure.

CITY OF HELENA GROWTH POLICY; Adopted May 9, 2011; CHAPTER 5, PUBLIC FACILITIES AND SERVICES states:

Since the City of Helena is also the State capitol there is a larger than normal percentage of property value and workload due to publicly owned buildings such as the State Capitol complex, federal buildings and City and County owned structures. None of these entities pay into the General Fund. The fire department utilizes mutual aid agreements and the fire department must operate more regionally with the other departments located in Lewis and Clark County.

The current existing structure and land are state owned, tax exempt trust properties. Under the proposed lease the site would be redeveloped with a privately owned office building and parking structure that would be taxable and contribute to funding city services. The previously exempt land would also be taxable for its beneficial use by the lessee, under MCA 15-24-1203.

No significant increase in the demand for government services will result under the proposed action.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:

List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

The CITY OF HELENA GROWTH POLICY; Adopted May 9, 2011; CHAPTER 5, PUBLIC FACILITIES AND SERVICES indicates that current water and waste water facilities have the capacity to accommodate future expected growth through 2025.

The City of Helena, Community Development Department consists of two divisions: Building and Planning. The Building Division conducts building and site plan reviews, issues building permits and provides inspection services at construction sites within the City limits to insure the public's health, safety and welfare.

The Planning Division assists members of the community with zoning, land use and development questions. Staff also provides information and assistance to developers, the business community and the public relating to any planning, zoning, land use or development matter.

The proposed lease site would be subject to City of Helena zoning, building codes, regulations and permitting. The demolition of the existing structure would also be subject to Montana Department of Environmental Quality regulations and permitting related to removal and disposal of hazardous materials.

Under the proposed action the lessee would be responsible for complying with applicable zoning and building codes, as well as state and city regulations and permitting.

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:

Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.

The site is currently a developed commercial property in an urban location. It is surrounded by existing commercial development, and does not provide access routes to any wilderness or recreational areas nearby.

No cumulative effects to recreational and wilderness activities are anticipated.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:

Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing.

The proposal does not include any changes to housing or developments.

No cumulative effects to population and housing are anticipated.

22. SOCIAL STRUCTURES AND MORES:

Identify potential disruption of native or traditional lifestyles or communities.

There are no native, unique or traditional lifestyles or communities in the vicinity that would be impacted by the proposal.

23. CULTURAL UNIQUENESS AND DIVERSITY:

How would the action affect any unique quality of the area?

The action would result in the demolition of a structure considered significant in the local history (i.e., a state Heritage Property.) There are currently 57 properties in Helena which are listed on the National Register of Historic Places. Helena has 6 Historic Districts, including the Helena Railroad Depot and Mt. Helena Park. Mills Hall is not located in a historic district, and is not listed on the National Register.

24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:

Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur as a result of the proposed action.

An appraisal of the property value has reported a bare land value of $670,000 for the 47,878 square foot lease site. The appraisal also documents the existing condition and structures, including Mills Hall, as detracting from the total value of the site. The appraiser concludes that "maximum productivity of the subject site would be for redevelopment with a new office or retail building that is commensurate with the current land values in this neighborhood." Under the no-action alternative, the site will continue to generate maintenance expenses and yet produce no income for the MSU and UM beneficiaries.

Under the Action Alternative, the beneficiaries will immediately begin to receive revenue of $45,000 annually; split based on their respective 50/50 land ownership shares. This represents a 7.8% increase in the University of Montana's net distributable revenues from Trust Lands statewide, compared to the FY 2013 report. It represents a 2.25% increase in relation to Montana State University's reported FY 2013 net distributable Trust Lands revenue. This single commercial lease would be a meaningful increase in the Trust Lands contributions to the Montana University system. The action alternative will also divert ongoing maintenance expenses to the new ground lessee.

EA Checklist Prepared By:	**Name:**	Brett Holzer	**Date:**	11/7/2014
	Title:	Real Estate Fiscal Analyst		

V. FINDING

25. ALTERNATIVE SELECTED:

I have selected the Proposed Alternative B, and recommend approval of the proposed ground lease and redevelopment of the property.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I have evaluated the comments received and potential environment affects and have determined to select the action alternative for the following reasons:

- Although Mills Hall is considered a State Heritage Property, it poses health and a safety hazard as it currently stands.
- The removal of Mills Hall is not precluded by any existing authorities and the renovation of Mills Halls was not put forward as a viable alternative by any proponent.
- In evaluating the potential impacts, they also must be weighed in respect to the commercial leasing authority and responsibility provided in MCA 77-1-901 - Declaration of policy and purpose. (1) Pursuant to Article X of the Montana constitution, the legislature declares that it is the policy of the state that state trust land is to be treated as a sacred trust and is subject to fiduciary principles in its management. It is the intent of the legislature that state trust land be managed in the best financial interest of current and future individual beneficiaries for whom this land is managed and held.
  (2) A purpose of this chapter is to implement Article X of the Montana constitution. To fulfill its commitment to the management of state trust land in the best long-term financial interests of the beneficiaries, the Montana legislature finds that the state can prudently maximize the long-term revenue accruing to the beneficiaries by issuing commercial leases on land where the chief value exists in its use for commercial purposes.

Considering that the proposed ground lease and redevelopment of the site was the only proposal received, and that the lease will provide immediate and long-term financial benefit to the beneficiaries, the environmental assessment checklist is the appropriate level of analysis for the proposed action.

The leasing of this commercial trust property meets the overall goals and objectives of the commercial leasing program and would satisfy the trust fiduciary mandate.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ] EIS	[ ] More Detailed EA	[X] No Further Analysis

EA Checklist Approved By:	**Name:**	John Grimm
	Title:	Real Estate Management Bureau Chief, DNRC
Signature: /S/ John Grimm		**Date:** 11/7/2014

Appendix A
Comments Received During Scoping and DNRC Responses

Comment: Comments were received from the State Historic Preservation Office, L&C County Heritage Tourism Council, and Montana Preservation Alliance opposing the proposal to issue a lease that would allow redevelopment of the site, and demolition of Mills Hall. They state that: *Mills Hall is heritage property eligible for listing in the National Register of Historic Places, and that it would be more cost effective to renovate and add on to the existing structure.*

Response: In appraisals conducted by J. Michael Joki, MAI, SRA, Montana State Certified General Real Estate Appraiser #152, Joki states in his Highest and Best Analysis of the property that: "*It will be shown in the following valuation section of this appraisal report that the existing building improvements are at the end of their economic life based upon the value of the underlying land. The existing building improvements are no longer the maximally productive use of this site. It will be shown that the highest and best use of the subject property is to raze the existing improvements to make way for a new and significantly more productive commercial building. When this is accomplished the property will become financially feasible and ultimately be maximally productive.*" In Joki's December 9, 2013 appraisal he concludes: " *The indication of value from the Income Approach is $650,000 which is less than the preceding value estimate of the subject site "as if" vacant at $778,000. This indicates that the existing building improvements are no longer financially feasible and therefore are not the maximally productive use of this site. Maximum productivity of the subject site would be for redevelopment with a new office or retail building that is commensurate with the current land values in this neighborhood".*

On December 17, 2012, the Land Board approved the acquisition of the property at a purchase price ($435,500) that reflected its highest and best Use as a vacant site ready for redevelopment.

On August 26, 2013 DNRC staffs met with City of Helena Planning Division, at that meeting it was confirmed by planning staff that any addition to the building footprint would cause the property to lose its grandfathered status concerning building height and parking spaces, and it would have to meet current regulations.

On August 13, 2014 the DOA Procurement Bureau received one proposal in response to RFP#14-2855A, that proposal was to lease the site for an initial rental of $45,000, and redevelop the site with a new office building and parking structure. No proposals were received to renovate the existing structure.

Comment: A comment was received from the Montana Preservation Alliance that *"for large building projects, Montana Code sections 18-2-101 through 105, make explicit requirements for agencies to first seek legislative consent to construct a building costing more than $150,000, and to also have the supervision of the State of Montana's Department of Administration, Division of Architecture and Engineering to (a) review and accept all plans, specifications, and cost estimates prepared by architects or consulting engineers; (b) approve all bond issues or other financial arrangements and supervise and approve the expenditure of all money; (c) solicit, accept, and reject bids and, except as provided in Title 18, chapter 2, part 5, award all contracts to the lowest qualified bidder considering conformity with specifications and terms and reasonableness of the bid amount".*

Response: MCA18-2-101. Definitions of building, costs, and construction. In part 1 of this chapter, with the exception of 18-2-104, 18-2-107, 18-2-113, 18-2-114, 18-2-122, and 18-2-123, the following definitions apply:
(1)(b) "Building" does not include a building, facility, or structure:
(iii) leased or to be leased by a state agency.

By definition, privately owned buildings or structures that are leased to state agencies are exempt from the requirements in MAC 18-2-101 through 105.

Comment: Comments were received from Montana Department of Transportation, and an adjoining land owner, that the conceptual design of the new office building appeared to encroach on the neighboring property and the access to that property from 11th Avenue.

Response: The actual building design will use the already established access from 11th Avenue on to the lease site, and the building will not encroach on the access to the adjoining property.

Comment: A comment was received from the Montana Preservation Alliance that *"It is entirely feasible, in the opinion of historic architects consulted by MT Preservation Alliance, and staff of both the Montana State Historic Preservation Office and the Montana State Architecture and Engineering Division, to renovate Mills Hall to produce modern high quality office space that would ably serve agency needs for decades to come. The building is large enough to accommodate modern floor plans, desirable upgrades and silver level LEED improvements, while the site would readily accommodate an addition that would take it to the preferred square foot capacity".*

Response: A Long Range Building Program – Project Request Evaluation prepared by CTA Inc. of Great Falls, for a project titled Corrections Building Renovation/HVAC upgrade states: *The existing facility, by nature of its original construction, has several shortfalls compared to the needs of a modern office building. The floor- to-floor height of 9'-6" limits the ability to provide horizontal ducting which would be required with most modern systems.*

The Diamond Construction estimate of renovation and building addition, dated 9/28/2012 stated: *The biggest concern we had was finding an HVAC system that would work with the present structure of concrete deck, columns and beams. The existing clearance under the beams presents a challenge to use standard ventilation ducts for air distribution that could further restrict head height and clearances.*

At the August 26, 2013 meeting with the City of Helena Planning Division, John Grimm asked Sharon Haugen, Community Development Director and other Planning Division staff present, *if the foot print of the existing building was changed by an addition, would the property lose its current grandfathered status for complying with current zoning height restrictions and required parking spaces?* The answer was a definite *Yes; the building would have to meet current zoning requirements.*

The statements from CTA, Diamond Construction, and the Helena Planning Division above would indicate the ability to effectively renovate and expand the current building are very limited. Further, no proposal or interest in renovating the current building was received in the RFP process.

Copies of Actual Comments Received Below

Montana Department of Transportation
2701 Prospect Avenue
PO Box 201001
Helena MT 59620-1001

Michael T. Tooley, Director
Steve Bullock, Governor

RECEIVED
OCT 27 2014
D.N.R.C.

October 24, 2014

Brett Holzer
Department of Natural Resources and Conservation
PO Box 201601
Helena, MT 59620-1601

Subject: Comments Concerning DNRC Ground Lease Trust – 1539 11th Ave, Helena
US 12, MP 44.7

Brett, the Montana Department of Transportation (MDT) has received the scoping notice concerning the DNRC's proposal to pursue a commercial ground lease involving demolition of Mill's Hall and redevelopment of commercial office facilities. The new facilities conceptually appear to significantly alter existing access location on 11th Ave. MDT will require the developer to seek an approach permit subject to our review. MDT anticipates the proposed development will be a candidate in the System's Impact Actions Process (SIAP). A copy of the SIAP Handbook has been attached to assist you in understanding the review process.

Given the limited information available to date, MDT's has some initial concerns with the proposed development access configuration as shown in the notice. The existing approach on 11th Ave to the adjacent property (L & D's) appears to be obliterated by the proposed office building. Additionally, the proposed structures appear to significantly impact the "street" visibility of the business previously noted. Any alterations to the approaches on 11th Ave must be approved by MDT. We encourage any perspective developer to consult with MDT concerning access to 11th Ave. prior to putting together a development plan.

If you have any questions, need additional information about MDT process, or want to meet, please contact me at 444-9416.

Sincerely,

Mike Tierney, Planner
Policy, Program and Performance Analysis Bureau

Attachments: Developer's Guide to SIAP

Copies: Jeff Ebert, P.E., Butte District Administrator
Dustin Rouse, P.E., Engineering Services Supervisor
Danielle Bolan, P.E., Traffic Engineer
Joe Zody, Access Management Supervisor
Lee Alt, Butte District Traffic Engineer
Stan Brelin, P.E., Traffic Operations and Analysis Unit Lead
Jim Skinner, Policy, Program and Performance Analysis Bureau Chief

Lewis & Clark County

Heritage Tourism Council

VIA EMAIL (landboard@mt.gov)

October 28, 2014

State Board of Land Commissioners
Governor Steve Bullock
Attorney General Tim Fox
Commissioner of Securities and Insurance Monica Lindeen
Secretary of State Linda McCulloch
Superintendent of Public Instruction Denise Juneau

Re: Mills Hall, 1539 11th Avenue, Helena, MT

Dear Commissioners:

We, the Helena/Lewis & Clark County Heritage Tourism Council (HTC), are writing to voice our concern with the proposed demolition of the above historic building known as Mills Hall, a women's dormitory and teaching facility built in 1919 on the campus of Montana Wesleyan College. It is the sole remaining building of the Montana Wesleyan/Inter-Mountain Union College's "Klein Campus," and is eligible as both a National Register of Historic Places property, and as a State Heritage Property. As such, it is subject to the State Antiquities Act.

The HTC is dismayed that the RFP issued for Mills Hall does not mention rehabilitation of the existing building or tax incentives a developer might be eligible for if rehabilitation is pursued (see RFP14-2888A – "Ground Lease and Build to Suit Building in Helena, Montana"). This omission is particularly disappointing, considering Heritage Preservation Officer Pam Attardo met with DNRC Bureau Chief John Grimm and others from DNRC and the City of Helena on August 26, 2013 and discussed the potential rehabilitation of Mills Hall (including an 8,000 sq.ft. addition), as well as demolition and new construction.

Ms. Attardo also discussed available tax incentives that would be attractive for a developer who chose rehabilitation over demolition; specifically, State and Federal historic tax credits (although state owned property is tax exempt, any improvements made by a developer of the property would be subject to taxes which could be offset by credits), and the City's tax abatement program.

The HTC and Helena community do not take demolition of their historic assets lightly. Recent public opposition to the proposed demolition of Central School is an example. We have finite historic assets in Helena and we urge the Land Board to reconsider an RFP that focuses solely on demolition of an historic asset without mention of rehabilitation. Mills Hall is the last remaining vestige of what was once an entire campus. The building has incredible character, exhibiting a symmetrical Jeffersonian and Roman Revival architectural style. The loss of this building would be regrettable, particularly since rehabilitation was never presented as an option in the RFP. In the abovementioned August 2013 meeting, Mr. Grimm

stated that Dick Anderson Construction had estimated that the costs of redevelopment (e.g., demolition and new construction) vs. rehabilitation were the same, so cost is not a barrier to rehabilitation.

Historic and architectural significance aside, the destruction Mills Hall is environmentally unsound and conflicts with sustainable design practices. The embodied energy contained within historic buildings, defined as the sum of all the energy required to extract, process, deliver, and install the materials needed to construct a building,[1] should be factored into the cost and environmental impact of the demolition and new construction option. Mills Hall is a 29,000 sq.ft. brick building. The demolition energy for a brick building of this size is approximately 15,500 Btu/sq. ft.[2], or 449,500,000 Btu total. This figure is high for brick structures due to the amount of energy that went into firing historic brick. When figuring the true environmental costs of demolition/new construction, one should also add the embodied energy of the new building. A new office building's embodied energy is approximately 1,641,748 Btu/sq. ft.[3] Assuming the new building would be 37,000 sq. ft. (the total square footage discussed in the May 2013 meeting), the total embodied energy for the new building would be 60,744,676,000 Btu. Added to the demolition energy of the existing building, that is a total of 60,789,626,000 Btu, a sobering environmental impact. And that does not include the cost of physically demolishing the building and disposing of demolition debris.

We respectfully submit our comments and hope that the Land Board and DNRC will reconsider this RFP.

Sincerely,

Hal Jacobson

Hal Jacobson
Lewis & Clark Co. Heritage Tourism Council

cc: Brett Holzer, DNRC
Patrick Rennie, DNRC
Peter Brown, SHPO

[1] Jackson. Mike, "Embodied Energy and Historic Preservation: A Needed Reassessment," APT Bulletin: Journal of Preservation Technology. 36 4, 2005

[2] *Ibid.*

[3] *Ibid.*

Heritage Tourism Council

Members: Dick Alberts, Chair • Peter Rudd, Vice Chair • Hal Jacobson • Roger Pedersen • Donna Torgerson • Troy Lutton, Mary Jane Bradbury

Staff: Pamela J. Attardo, Heritage Preservation Officer
316 N. Park, Helena, MT 59623 • 406.447.8357 • pattardo@lccountymt.gov • www.helenahistory.com

MPA
MONTANA PRESERVATION ALLIANCE

October 30, 2014

Brett Holzer
Montana Department of Natural Resources and Conservation (DNRC)
PO Box 201601
Helena, MT 59620-1601

Re: Proposed Demolition of Mills Hall (24LC0544), 1539 11th Avenue, Helena

Dear Mr. Holzer

We write to oppose the proposal now under consideration by the DNRC, to lease land at 1539 11th Avenue in Helena to a private developer, involving demolition of Mills Hall, a noteworthy historic building currently on the property, and its replacement with a modern commercial office building. Instead, we urge the department to pursue renovation and expansion of the existing historic building in keeping with state antiquities and legislative goals for stewardship of state-owned properties.

While we appreciate the interest by the department to expand its existing space and increase revenues from Trust Lands benefitting the state's university system, it is unfortunate to seek to do so by demolishing state heritage properties, particularly when they can be upgraded, expanded and modernized.

The property at risk, Mills Hall, was constructed in 1919 as part of the Montana Wesleyan College to serve as a women's dormitory and teaching facility. It is now the last physical remnant of several buildings formerly located along 11th Avenue that comprised the Montana Wesleyan/Inter-Mountain Union College's "Klein Campus." Although Mills Hall was damaged by the 1935 Helena earthquakes, it was subsequently repaired and reopened for occupancy in 1937. The building sold in 1971 to private interests in Helena, and in 1981, the State of Montana acquired it for state agency use.

With its Classical Revival styling and Italianate influences, Mills Hall is a graceful early 20th century institutional building, one that retains tremendous strength of design and a singular history. The building served various educational and social/ humanitarian roles affiliated with the Montana Wesleyan College, the Inter-Mountain Union College, the Montana Deaconess School, and the Inter-Mountain Deaconess Home. For these significant architectural and historical values it was determined eligible for listing in the National Register of Historic Places in 1981.

Structurally, Mills Hall, with its round-arched window openings, low-pitched hip roof, multiple hipped dormers, scroll-cut rafters, and scroll modillion roof bracketing, draws directly from Classical and Italinate style. While clearly the work of a trained architect, the original designer is unknown at this time. However, today Mills Hall stands out as the one building of architectural quality amidst acres and acres of cheap commercial buildings and bland state buildings along 11th Avenue. As MT SHPO noted in their June 10, 2014 comments to DNRC Archeologist Patrick Renne, "Mills Hall is remarkable relative to the buildings DNRC currently occupies, and stylistically, Mills Hall is far superior to what the private sector or the state are offering for agency offices."

120 Reeder's Alley
Helena, MT 59601
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info@preservemontana.org

None of the surrounding buildings on 11th Avenue have the architectural merit of the Mills Hall, and yet rather than refurbishing this building and adding to it, or redeveloping a non-historic property, the DNRC currently proposes to replace it with yet another uninspired, flat-roofed office building along with a large-scale parking structure. Given the opportunity to breathe new life into a building of high historical value, instead of opting to demolish this heritage property, we strongly urge the DNRC to save and renovate it.

It is entirely feasible, in the opinion of historic architects consulted by MT Preservation Alliance, and staff of both the Montana State Historic Preservation Office and the Montana State Architecture and Engineering Division, to renovate Mills Hall to produce modern high quality office space that would ably serve agency needs for decades to come. The building is large enough to accommodate modern floorplans, desirable upgrades and silver level LEED improvements, while the site would readily accommodate an addition that would take it to the preferred square foot capacity. In fact, there are tax credits to incentivize both the historic preservation of this building and energy efficiency of new heating and ventilation that would be cost-effective in an overall project that retains this historic building.

However, while the agency's May 2014 RFP inviting proposals for redeveloping 1566 11th Avenue did not exclude a restoration proposal for Mills Hall, it did not encourage one. And various requirements listed in the RFP made it less-than-likely that a proposal to refurbish the building would be crafted.

We note that for large building projects, Montana Code sections 18-2-101 through 105, make explicit requirements for agencies to first seek legislative consent to construct a building costing more than $150,000, and to also have the supervision of the State of Montana's Department of Administration, Division of Architecture and Engineering to (a) review and accept all plans, specifications, and cost estimates prepared by architects or consulting engineers; (b) approve all bond issues or other financial arrangements and supervise and approve the expenditure of all money; (c) solicit, accept, and reject bids and, except as provided in Title 18, chapter 2, part 5, award all contracts to the lowest qualified bidder considering conformity with specifications and terms and reasonableness of the bid amount.

However, when we checked with the Montana State Architecture and Engineering Division in early August, 2014, shortly before proposals were due for this project, we learned that this had not been done, and that most of their staff were unaware there was an RFP circulating for Mills Hall. One may argue that having the building constructed under MT Land Board's authority circumvents this section of state law, but proceeding without this oversight does not appear to honor legislative intent.

For all these many reasons, we believe that the Montana DNRC should step back to the planning stages for this project, and further explore stewardship options for historic Mills Hall. A model stewardship project for this significant heritage property would be a commendable thing to pursue.

Respectfully,

Chere Jiusto
Executive Director

Cc: John Tubbs, MT DNRC
Mark Baumler, MT SHPO

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Montana
Historical Society

Historic Preservation
Museum
Outreach & Interpretation
Publications
Research Center

October 27, 2014

Mr. Patrick Rennie
Montana DNRC
1625 Eleventh Ave.
PO Box 201601
Helena, MT 59620

Ref: Mills Hall Redevelopment Proposal

Dear Mr. Rennie:

We reviewed your September 30 letter stating that the Montana DNRC has tentatively accepted the one proposal it received in response to the Mills Hall property redevelopment RFP. This proposal, from Dick Anderson Construction calls for demolition of Mills Hall, which is a Heritage Property, and the construction of a new building. SHPO concurs with DNRC that the plan as described in the proposal would be adverse to Mills Hall.

As the State Land Board reviews the development proposal and MEPA documents, we ask them to consider SHPO's June 10, 2014 bullet point comments on the undertaking.

If the Land Board commits to the development proposal, we ask the DNRC to continue to consult with SHPO and identify mitigation measures commensurate with the undertaking's adverse effects.

Sincerely,

Pete Brown
Historic Architecture Specialist

Attachments: SHPO letter to DNRC June 10, 2014

File: DNRC-General-2014100102

225 North Roberts Street
P.O. Box 201201
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montanahistoricalsociety.org

Big Sky. Big Land. Big History.
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Historic Preservation
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Research Center

June 10, 2014

Mr. Patrick J. Rennie
DNRC Archaeologist
Montana DNRC
1625 Eleventh Ave.
PO Box 201601
Helena, MT 59620

Ref: DNRC's Proposed Demolition or Rehabilitation of Mills Hall (24LC0544), 1566 11th Ave., Helena

Dear Mr. Rennie:

Thank you for initiating consultation with SHPO under the State Antiquities Act for the above referenced undertaking. We reviewed the September 2012 cost estimates reflecting Option 1: rehabilitation/building addition ($7 million); and Option 2: demolition/new construction ($8.1 million). Both would provide 3,600 square feet of office space and LEED certification.

SHPO concurs with DNRC that demolition would be adverse to Mills Hall, a State-Owned Heritage Property built in 1919. The building is significant for its architectural merit and its historic association with Montana Wesleyan College. The intent of the Antiquities Act is for agencies to make good faith efforts towards preserving its Heritage Properties. We encourage the DNRC and the State Land Board to consider the following items in their decision making:

- As presented in the cost estimate, Option 1 is a defensible choice based on its $1.1 million savings.
- Work involving existing structures is more labor intensive than material intensive. Because labor would likely come from in state, and many building materials come from out of state, preservation directs more of the state's investment towards the Montana economy and Montana jobs.
- Beyond the cost estimate's look at Option 1, we ask DNRC to explore the feasibility of a seismic retrofit, and parking. Developers and decision makers are less likely to entertain options conditioned with such unknowns.
- Aesthetically, Mills Hall is remarkable relative to the buildings DNRC currently occupies. Stylistically, Mills Hall exceeds what the private sector or the state are offering for agency offices.
- Pragmatically, Mills Hall is made of resilient brick, concrete and granite. Although it is due for a new roof, at nearly 100 years of age, the building shows no signs of significant deterioration.
- DNRC states that LEED certification is a priority in this undertaking. Option 1 could achieve LEED's highest, Platinum level certification by renewing Mills Hall and the embodied energy it represents. Sending thousands of tons of viable building material to the landfill is non-sustainable.
- Although Mills Hall would need an addition and its floor plan requires modifications for a change in use, SHPO would be flexible in its review of an Option 1 scenario as an alternative to demolition.

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montanahistoricalsociety.org

File: DNRC/Trust - 20[illegible]2109

- Avoidable demolitions of historic buildings typically receive bad press. Public admiration of successful preservation projects is nearly universal.

Please keep SHPO abreast of responses to DNRC's RFP. We understand that proposals are due in September 2014 and that the Land Board will likely vote on proposals in October. For SHPO to have a reasonable opportunity to comment on proposals, we will need access to proposal summaries well in advance of the board's vote. Depending on those proposals, SHPO may contact the Land Board directly with our preservation concerns. In the meantime feel free to contact me with any questions you might have.

Sincerely,

Pete Brown
Historic Architecture Specialist

Holzer, Brett

From: tracy <slick388@hotmail.com>
Sent: Wednesday, October 08, 2014 10:04 AM
To: Holzer, Brett
Subject: 1539 11th Ave Property Proposal

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Holzer,

I am Tracy Prescott, Owner of Prescott Helena Mall at 1605 and 1609 11th Ave. The property adjacent to the property known as Mills Hall. I received your letter dated 9/30/2014 and have a couple of questions. From the Conceptual Drawing that you provided with your letter, It looks like your proposal overtakes the west access to my property. could you please provide me with the property pins that you are using and also provide the setback from the property line that your proposed building would utilize.

I realize that this is a conceptual drawing and may not be to exact proportions but I am sure you can understand my concern of blocking my property and loosing access to my business. Please feel free to call me anytime at 406-580-6811. Thank you for you prompt reply.

Tracy Prescott, Owner
Prescott's Helena Mall
PO Box 43
Belgrade, MT 59714
slick388@hotmail.com
406-580-6811

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Trust Land Management Division

STEVE BULLOCK, GOVERNOR

1625 ELEVENTH AVENUE

DIRECTOR'S OFFICE (406) 444-2074
TELEFAX NUMBER (406) 444-2684

PO BOX 201601
HELENA, MONTANA 59620-1601

SCOPING NOTICE

Request for Public Comments

September 30, 2014

The Department of Natural Resources and Conservation (DNRC) is pursuing a commercial ground lease of a Trust Lands parcel located at 1539 11th Avenue in Helena, Montana. The primary purpose is to lease approximately 1 acre of land to generate revenue according to the Trust Lands mandate. The beneficiaries of revenue from this parcel are both Montana State University and the University of Montana. The sole proposal received by DNRC, currently under consideration, would be a ground lease to a developer who would demolish the existing structures and redevelop the site as a build-to-suit commercial office building.

The department is currently conducting an analysis under the Montana Environmental Policy Act (MEPA) of the impacts that may occur as a result of the proposed ground lease and redevelopment. By this letter, DNRC is requesting comments under MEPA regarding the proposed ground lease, including the intended demolition of Mills Hall and redevelopment of the site for commercial use which is similar to the uses of the parcels in the surrounding area.

To ensure your comments are considered as part of the MEPA process, they must be received no later than 5:00 pm on **October 30, 2014**.

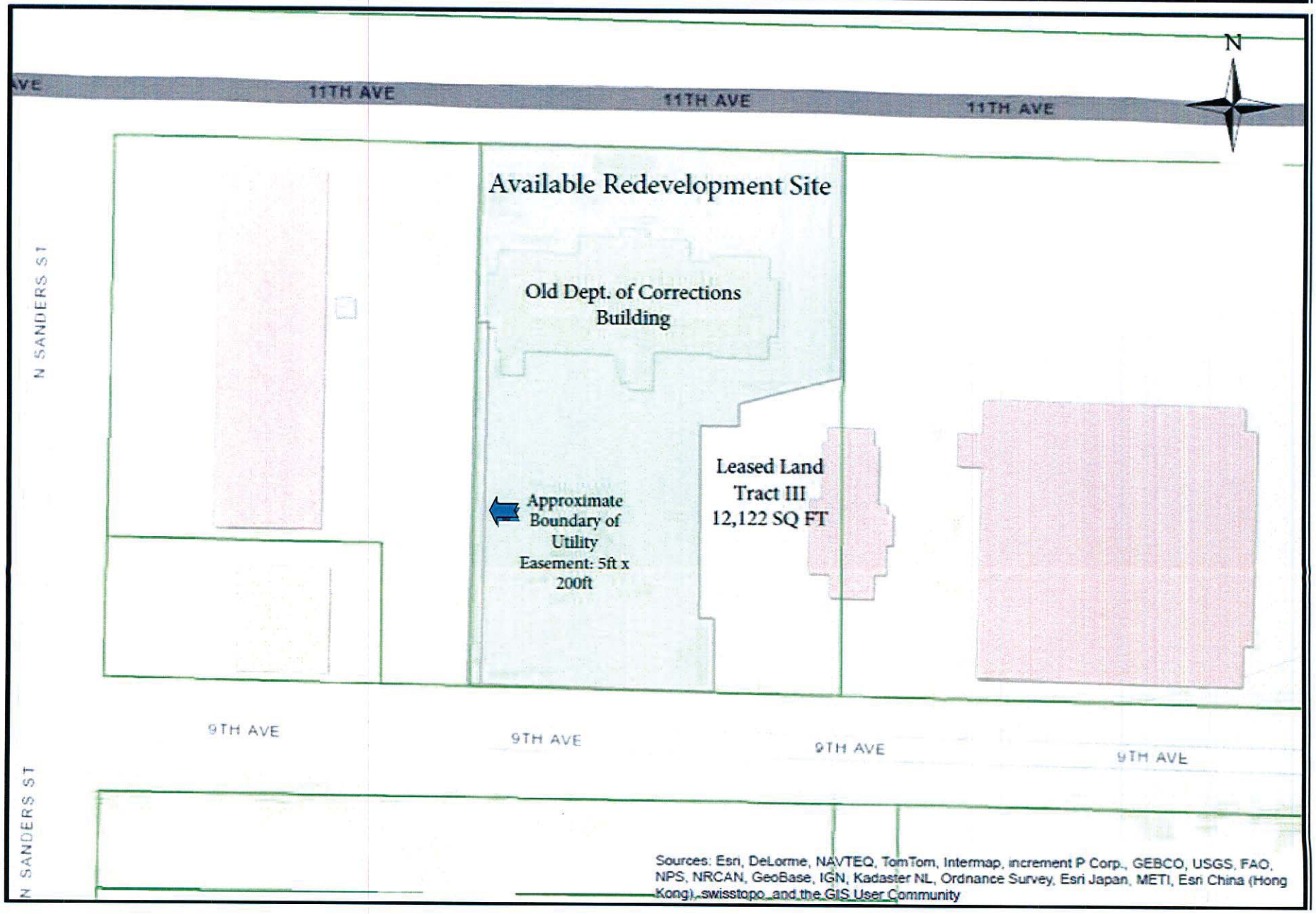
Comments may be sent to

Brett Holzer
Department of Natural Resources and Conservation
P.O. Box 201601
Helena, MT 59620-1601
(406) 444-1363
bholzer@mt.gov

Additional information on the commercial leasing program within DNRC's Trust Lands Management Division is available on the website:
http://www.dnrc.mt.gov/Trust/Commercial/Default.asp

See the next page for a site map of the parcel.

Lot D, Cannon CW Addition to the City of Helena



State of Montana Trust Lands Parcel in Helena, MT
Site Layout— Current as of September 2014

Site and Parking Rendering

CHECKLIST ENVIRONMENTAL ASSESSMENT

Proposed Trust Lands Commercial Ground Lease, 1529 11th Avenue, Helena, MT

Appendix C: Request for Public Comment Notice List of Recipients

Name	Entity	notes
Pam Attardo, Historic Preservation Officer		
Jim Smith, Mayor	City of Helena	
Mick Robinson, Deputy Commissioner for Fiscal Affairs / Chief of Staff	Office of the Commissioner of Higher Education	
Vivian Hammill, MUS Chief Legal Counsel / Deputy Commissioner	Office of the Commissioner of Higher Education	
	Lewis and Clark County Commissioners	
Peter Brown, Historic Architecture Specialist	State Historic Preservation Office	
Mark Baumler	State Historic Preservation Office	
Glen Marx, Executive Director	Montana Association of Land Trust	
JENNIFER ANDERS (primary)	Office of the Governor	LAND BOARD STAFFERS
CORY SWANSON	Attorney General's Office	LAND BOARD STAFFERS
JON BENNION	Attorney General's Office	LAND BOARD STAFFERS
ALAN JOSCELYN	Attorney General's Office	LAND BOARD STAFFERS
JEFF BARBER (primary)	Office of Commissioner of Securities & Insurance	LAND BOARD STAFFERS
BRETT O'NEIL	Office of Commissioner of Securities & Insurance	LAND BOARD STAFFERS
ERIC STERN (primary)	Secretary of State Office	LAND BOARD STAFFERS
BLAIR FJESETH	Secretary of State Office	LAND BOARD STAFFERS
ANN GILKEY	Superintendent of Schools	LAND BOARD STAFFERS
LUCY RICHARDS	BD. SECRETARY	LAND BOARD STAFFERS
ELIZABETH RICHARDSON	Office of the Governor	ADMIN ASST
JULIE JAMES	Attorney General's Office	ADMIN ASST
JODI MEDLAR	Office of Commissioner of Securities & Insurance	ADMIN ASST
SUE TINSLEY	Secretary of State Office	ADMIN ASST
BILLIE LEDEAU	Superintendent of Schools	ADMIN ASST
RENEE ERB	DNRC DIRECTOR/BD. SEC.	ADMIN ASST
RUSSELL KATHERMAN	MT Dept of Admin- Architecture & Engineering	
GARETT BACON	MT Dept of Admin- Facilities	

	Management	
JEANNIE LAKE	MT Dept of Admin-Procurement	
BRAD SANDERS	MT Dept of Admin-Procurement	
	Lewis & Clark County Planning Division	
Leslie Taylor	MSU Bozeman	
Rosi Keller	University of Montana	
	Helena Area Chamber of Commerce	
	Montana Preservation Alliance	
LIZ BANGERTER	Representative HD 80	
MARY CAFERRO	Senator SD 40	
GALEN HOLLENBAUGH	Representative HD 81	
CHUCK HUNTER	Representative HD 79	
CHRISTINE KAUFMANN	Senator SD 41	
Bonnie Lovelace	Dept. of Environmental Quality	
Carla Haas	Dept. of Transportation	
Basile, Michael A , Trustee		
Tracy Prescott, Manager	Prescott Helena Mall, LLC	Adjacent Landowner
	Intermountain Deaconess Home	Adjacent Landowner
	SCHOOL DISTRICT #1	Adjacent Landowner