

****ATTENTION****

The City Council meeting will be held in a hybrid format that may include both in-person AND virtual attendance via Zoom. Unless they have cause to appear virtually, Councilmembers will attend the meeting in person in Council Chambers, fifth floor of City Hall, 316 N. 26th Street. In order to honor the Right of Participation and the Right to Know in Article II, Sections 8 and 9, of the Montana Constitution, the City of Billings and City Council are making every effort to meet the requirements of the open meeting laws.

Citizens are invited to:

- . Review the Agenda Packet on the City's website at: www.billingsmt.gov and click on "Your Government," "City Council," and "Agendas & Minutes".
- . View the meeting:
 - . On Community 7 TV - Channel 7 or Channel 507 -- Spectrum Cable. *(On evenings when there is a conflict with School District No. 2 Board meetings, the City Council meeting will be broadcast on Channel 8 - Spectrum Cable.)* Channel 7 or Channel 978 - TDS Fiber.
 - . Online at www.comm7tv.com and click on the "Watch Live" icon. Community 7 also has links to their Facebook page and YouTube channel.
 - . On the City's website at www.billingsmt.gov and click on "Watch Meetings Online" on the homepage.
 - . In-Person.

Citizens may submit public comment via the following methods:

- . Mail: City Clerk, P.O. Box 1178, Billings, MT 59103
- . Email: Council@billingsmt.gov.
 - . Emails received after 3:00 PM on the day of the meeting, may be posted on the Council's webpage the following day for public viewing.
- . Attend the meeting in person

Please contact Denise Bohlman, City Clerk, at bohlmand@billingsmt.gov, or at 406.657.8210, with any questions.



VISION STATEMENT:
"The Magic City: A diverse,
welcoming community
where people prosper and
business succeeds."

**WORK SESSION AGENDA
DECEMBER 1, 2025**

**COUNCIL CHAMBERS
316 N. 26th St., 5th Floor**

5:30 P.M.

CALL TO ORDER: Mayor Cole

PUBLIC COMMENT ON ALL ITEMS. This is the time to comment on any matter (Agenda or Non-Agenda) falling within the scope of the Billings City Council. There will also be time in conjunction with each agenda item for public comment relating to that item. You may only speak once for each item during the meeting.

Please note, the City Council cannot take action on any item of significant interest to the public that does not appear on the agenda. Comments are limited to three (3) minutes during each public comment period or as set by the Mayor. **Speaker sign-in required.** Please sign the roster at the cart located at the back of the Council chambers or at the podium.

1. **Redevelopment Opportunities for 802 Yellowstone Avenue.**
- Public Comment
2. **Follow-up on Aggressive Traffic and Excessive Noise Initiative.**
- Public Comment

HIGHLIGHT UPCOMING AGENDA ITEMS OF COUNCIL INTEREST:

COUNCIL DISCUSSION:

PUBLIC COMMENT on "NON-AGENDA ITEMS". **Speaker Sign-in required.** *(Restricted to ONLY items not on this printed agenda. Comments are limited to 3 minutes or as set by the Mayor. Please sign the roster at the cart located at the back of the Council chambers or at the podium.)*

ADJOURN:

Note:

- This meeting is an "informal" meeting of the City Council. The content of the Agenda is subject to change at the meeting.
- In the event there is a closed executive session to discuss litigation strategy, the other parties to the case(s) discussed are not public bodies or associations as described in Section 2-3-203(1) and (2), MCA. The meeting is closed, as allowed by Section 2-3-203(4)(a), MCA, "to discuss a strategy to be followed with respect to litigation when an open meeting would have a detrimental effect on the litigating position" of the City of Billings.
- In the event there is a closed executive session to discuss a matter related to an individual's privacy, the presiding officer must determine the demands of individual privacy exceed the merits of public disclosure and the individual has not waived their right to privacy.

City Council Work Session

Date: 12/01/2025
Title: Redevelopment Opportunities for 802 Yellowstone Avenue
Presented by: Wyeth Friday
Department: Planning & Community Services
Presentation: Yes
Legal Review: Not Applicable
Project Number: N/A

RECOMMENDATION

There is no formal recommendation for this item on the Work Session, but staff does see a preferred option to develop a small open space and community garden at the site. Staff is expecting direction from the City Council on redevelopment options for 802 Yellowstone Avenue so the City can move forward with improving the property in 2026.

BACKGROUND (Consistency with Adopted Plans and Policies, if applicable)

The property at 802 Yellowstone has been a nuisance property for the neighborhood and the City for over 20 years. Code Enforcement has a record of cases for the property dating back to 2005. These cases included violations of graffiti, open storage, nuisance weeds, boarded building, and a nuisance structure. In 2024, the City filed in district court to get the property into compliance. Ultimately through mediation, the owner agreed to deed the property to the City as he was not able to meet the compliance requirements. The City also saw this as an opportunity to utilize the US EPA Brownfields program to access clean up resources both professional and financial. The City also wants to ensure the property is redeveloped in a way that fits the neighborhood and the neighbors' interest in having a property that contributes to the area again as it did decades ago.

Since late 2024, Big Sky Economic Development (BSED) and the city have been working on the assessment and cleanup of 802 Yellowstone Avenue (former Meat House and Lockers). The City obtained ownership of the property in December 2024. With the cooperation of the previous owner, Granite Peak Environmental (BSED's consultant for the Brownfields program) assessed the presence and extent of hazardous building materials in the structure, developed an Analysis of Brownfield Cleanup Alternatives (ABCA), and conducted a public meeting with City staff at City Hall on February 27, 2025 to discuss the findings. Through the Brownfield Revolving Loan Fund, BSED can provide funding for the abatement and demolition of the building.

Staff began discussion in Summer 2025 with Community Development staff, Parks staff and Finance staff to evaluate options for redevelopment, consider further neighborhood engagement, and preparation to bring options to the City Council for direction on moving ahead with redevelopment activity. Based on staff analysis, a community survey that was conducted in Summer/Fall 2025, City staff is bringing the Council information and options for redeveloping the property. Staff has developed the following concepts and refined them further for Council review, discussion and direction. The options are noted below and outlined further in the attached presentation that will be shared at the Work Session:

Initial Concepts

- HOME and CDBG Program funds for siting a Single Family Modular Home on the property for an owner through the First Time Homebuyer Program - there are Program and HUD challenges with this scenario as HUD will not allow use of CDBG funds for "new residential construction" on the property. The City would need to utilize mostly HOME funds, which are currently allocated for the LB Lofts project in the Heights that is slated to start construction in 2026. Availability of HOME funds would have to be evaluated in mid 2026 and might not be a predictable funding source if other projects were drawing on City HOME funds at that time.
- Private development approach (Implementation concerns) - The City has little to no experience in preparing RFPs for specific development concepts where a developer would be required to meet certain stipulated requirements of a development project, and then be conveyed the land in a way that would incentivize the project's success. The City should become familiar with this kind of approach, especially if it decides to convey surplus park land, but completing a process like this has many challenges and hurdles.
- Small Open Park Space (Parks supportive) - This option was well supported by the survey respondents and has relatively clear access to CDBG funds, while creating as limited impact to the Parks Department budget and ongoing maintenance.
- Open Space/Community Garden (Parks supportive) - This option like the one above was well supported by the survey respondents and access relatively clear access to CDBG funds, while creating as limited impact to the

Parks Department budget and ongoing maintenance.

Refined Concept Recommendation

- Open space/community garden could be started now with CDBG/CPTED funds available now and into 2026. Survey results strong in favor of open space/garden.

STAKEHOLDERS

The Billings community is a stakeholder in this effort, but the neighbors in the area around 802 Yellowstone have finally received some significant benefit from having this nuisance property completely cleaned up so that it is ready for future redevelopment in the neighborhood. The neighborhood will also benefit from the redevelopment of the property and a community survey conducted by City staff showed that small open space with a community garden or a single residential unit were clearly preferences for the neighbors in the area. The residents of Billings also benefit from the City's use of the US EPA Brownfields program administered by Big Sky Economic Development and the option to utilize the revolving loan fund (RLF) for this project. Approaching cleanup of this property through this program, after years of challenges in getting it addressed, benefits the City by funding the cleanup work and flexibility in what the City may reimburse the RLF program in the future.

ALTERNATIVES

There are no action alternatives for City Council since this is a Work Session. Formal action may occur later in the redevelopment process, if there are applicable action items.

FISCAL EFFECTS

There is no financial impact to the City's budget at this time. There will be staff time and various budget impacts depending on what redevelopment option the City chooses. For example, if the City decides to develop a small open space/community garden on the property, Community Development and the Parks Department will be involved, with CDBG funding being applied for some of the property improvements and Park staff spent on coordinating the community garden and some amount of maintenance to the open space areas.

Future redevelopment of the property, guided by the City, that benefits the community and meets the US EPA Brownfields program goal of remediating a property to enable redevelopment, means the City would not be obligated to pay back the loan based on the redevelopment scenario. If any portion of the loan were to be paid back, it would come in two cases:

- From profit the City made from selling the property outright and not insuring community benefit.
- If the City ensures the property is redeveloped to achieve community benefit through possible residential, commercial or open space uses of the property, loan repayment would be limited to any profit the City made after carrying out one of these redevelopment scenarios.

Attachments

802 Redvelopment Presentation
Community Survey
802 Yellowstone Brownfields Condition Analysis

802 Yellowstone

Redevelopment Opportunities

City Council Work Session

December 1, 2025



Project Background

- City acquired property in December 2024
- Zoned N-1 like surrounding neighborhood(allows 1 or 2 residential units)
- Property is 5,120 square feet in size (Long and narrow)



Billings Brownfields Program

City utilized Big Sky Economic Development managed EPA Brownfield grants:

- Assessment Grant
 - Phase I and II Assessments
 - Community Outreach (early 2025)
 - Cleanup Planning
- Revolving Loan Fund
 - Cleanup Planning
 - Site Cleanup Funding
- Community Survey
 - Comm. Dev. Developed
 - Coord. CE, CD, and Parks
 - 130 Responses



Abatement & Demolition

- Abatement began on September 15th (Week 1)
- Demolition completed on September 26th (Week 2)
- Asbestos abated prior to demolition or segregated during demolition
- Lead-based paint was removed during full building demolition
- Metal from building recycled





KOMATSU

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WASP
NEST





Had to
remove this
tree





BEFORE



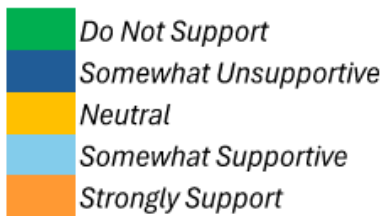
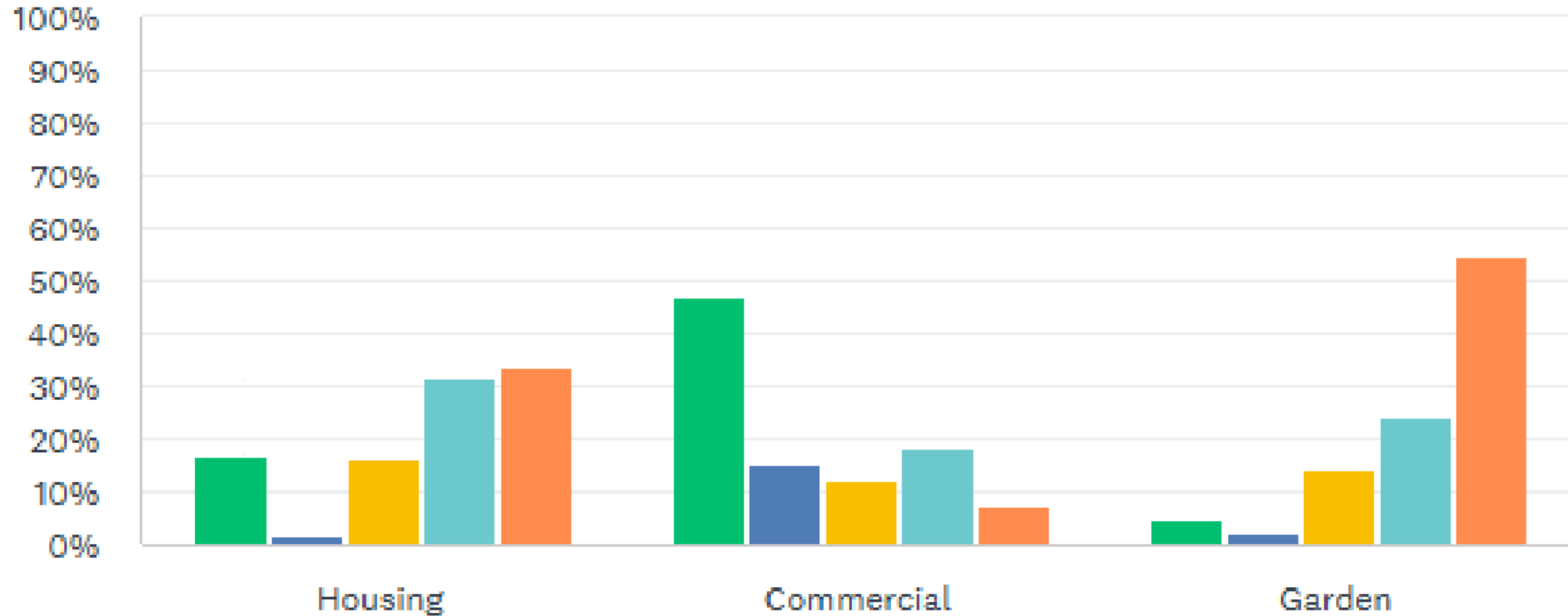
AFTER



Redevelopment Concepts

- Ultimate goal is to have property redeveloped, part of the neighborhood again
- Conducted public meeting in early 2025
- Assembled team of Code Enforcement, Community Development, Parks, Planning staff
- Determined redevelopment concepts
- Developed Neighborhood Survey in Summer 2025

The City has several options for property redevelopment. How strongly do you support the following:



Survey Results – 130 Responses

Redevelopment Concepts

- Initial Concepts
 - HOME and CDBG Program funds for siting a SF Modular Home on the property for First Time Homebuyer (Program challenges)
 - Private development approach (Implementation concerns)
 - Small Open Park Space (Parks and Survey supportive)
 - Open Space/Community Garden (Parks and Survey supportive)
- Refined Concepts
 - × HOME Program budget limitations would prevent SFD modular home concept until mid 2026, if funds were available
 - × City driven RFP type process for private development uncertain
 - ✓ Open space/community garden could be started now with CDBG CPTED funds available now and into 2026
 - ✓ Survey results strong in favor of open space/garden

Staff Recommended Concepts

- Public Open Space/Community Garden
 - ✓ Survey strong in favor of open space/garden
 - ✓ Provides neighborhood gathering space
 - ✓ Parks can organize non-profit participation in community garden development and operations
 - ✓ Open space/community garden would be low maintenance given garden model and very small footprint
 - ✓ Open space/community garden concept could be started right away with CDBG/CPTED funds available now and into 2026

Yellowstone Ave



Benches



Benches



Benches



Gifting Garden



10x20 Plot sizes



Raised Beds



Divided | Options



8th St.



*Estimated 50x100 feet usable space

Tool box

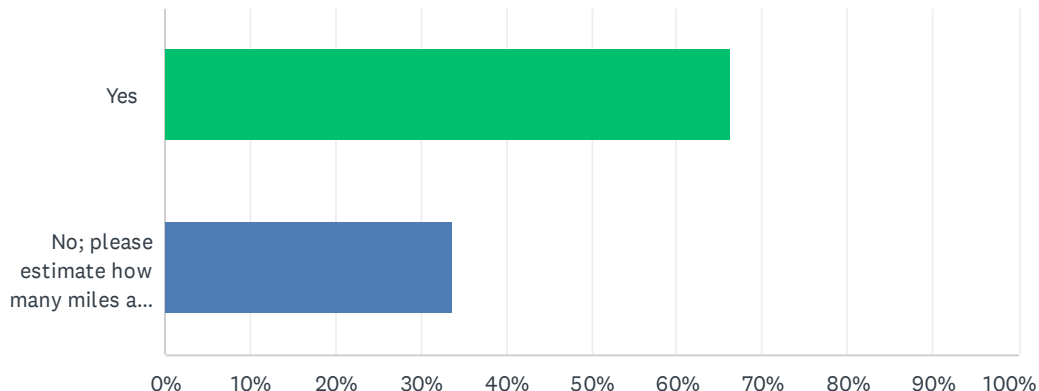
Next Steps

- City Council direction on redevelopment options
- Begin developing project quickly if open space/ community garden selected
- Begin redevelopment Summer 2026



Q1 Do you live in the neighborhood? Neighborhood is defined as a 10-block radius around 802 Yellowstone Ave.

Answered: 131 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	66.41%	87
No; please estimate how many miles away you live from 802 Yellowstone Ave.	33.59%	44
TOTAL		131

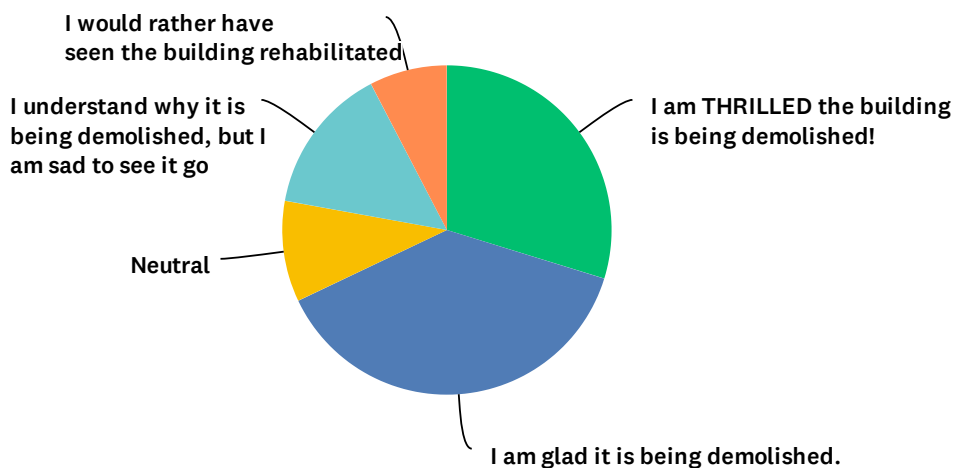
#	NO; PLEASE ESTIMATE HOW MANY MILES AWAY YOU LIVE FROM 802 YELLOWSTONE AVE.	DATE
1	Live? About 10, but I'm a mail carrier in the area	9/27/2025 8:37 AM
2	25	9/27/2025 8:09 AM
3	0.5	9/27/2025 1:58 AM
4	1	9/26/2025 11:25 PM
5	2	9/25/2025 10:04 PM
6	5	9/25/2025 6:44 PM
7	3	9/25/2025 4:42 PM
8	7	9/25/2025 3:43 PM
9	7	9/25/2025 1:13 PM
10	820 8th St W	9/25/2025 1:07 PM
11	3 miles	9/25/2025 12:49 PM
12	1	9/25/2025 11:47 AM
13	2	9/25/2025 8:25 AM
14	2	9/25/2025 2:58 AM
15	2	9/24/2025 9:53 PM
16	4	9/24/2025 9:30 PM
17	1 mile	9/24/2025 4:13 PM

802 Yellowstone Avenue Neighborhood / Community Input Survey

18	5.5	9/24/2025 3:57 PM
19	3	9/24/2025 3:23 PM
20	5 miles	9/24/2025 1:55 PM
21	2	9/24/2025 12:49 PM
22	9.5 miles	9/24/2025 12:43 PM
23	1 blick	9/24/2025 12:24 PM
24	1-2	9/24/2025 10:33 AM
25	8	9/24/2025 9:23 AM
26	6	9/24/2025 8:26 AM
27	2	9/24/2025 7:39 AM
28	1	9/24/2025 7:33 AM
29	2 miles	9/24/2025 7:19 AM
30	2	9/24/2025 7:12 AM
31	2	9/24/2025 6:39 AM
32	1.2 miles	9/24/2025 5:04 AM
33	3	9/24/2025 12:45 AM
34	1 mile	9/23/2025 10:58 PM
35	5	9/23/2025 9:53 PM
36	7	9/23/2025 9:32 PM
37	917 Burlington Ave	9/23/2025 8:35 PM
38	2	9/23/2025 7:11 PM
39	1	9/8/2025 3:42 PM
40	1300	9/4/2025 9:01 AM
41	2.6	9/4/2025 8:19 AM
42	4	9/4/2025 8:15 AM
43	0	9/3/2025 4:53 PM
44	10 miles	8/13/2025 4:00 PM

Q2 How do you feel about the demolition of the building?

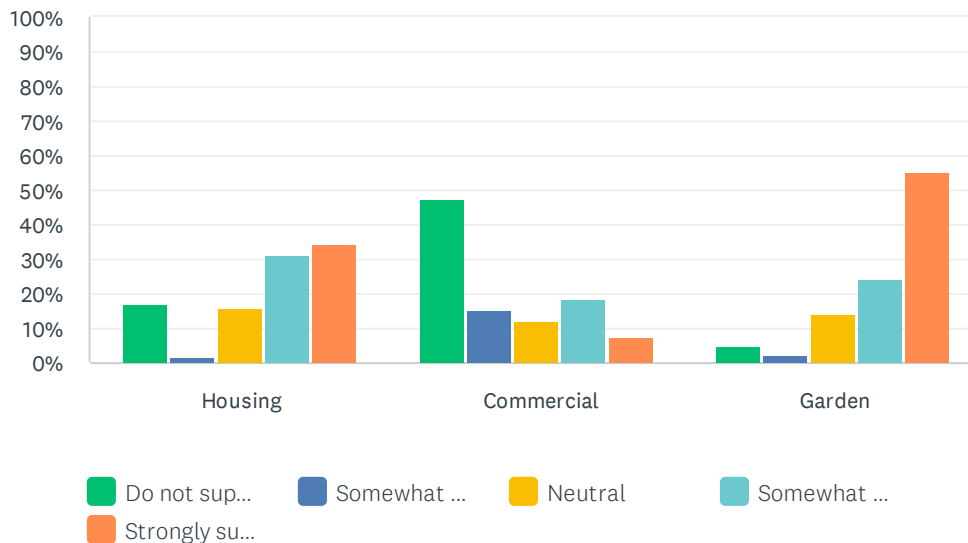
Answered: 131 Skipped: 0



	I AM THRILLED THE BUILDING IS BEING DEMOLISHED!	I AM GLAD IT IS BEING DEMOLISHED.	NEUTRAL	I UNDERSTAND WHY IT IS BEING DEMOLISHED, BUT I AM SAD TO SEE IT GO	I WOULD RATHER HAVE SEEN THE BUILDING REHABILITATED	TOTAL	WEIGHTED AVERAGE
(no label)	29.77% 39	38.17% 50	9.92% 13	14.50% 19	7.63% 10	131	2.32

Q3 The City has several options for property redevelopment. How strongly would you support:

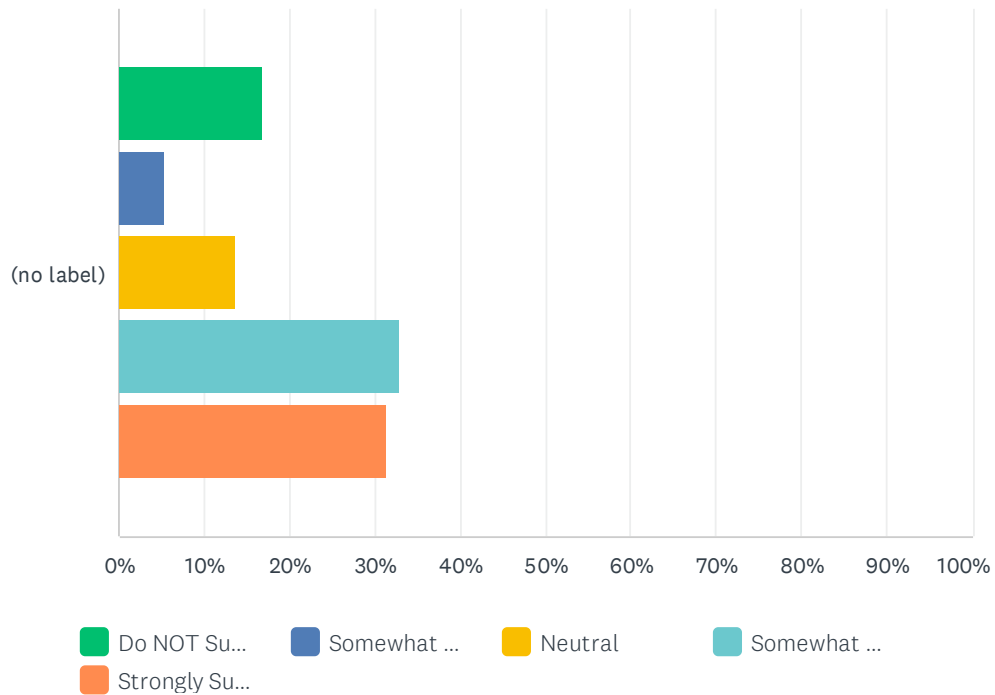
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
Housing	16.79% 22	1.53% 2	16.03% 21	31.30% 41	34.35% 45	131	3.65
Commercial	47.20% 59	15.20% 19	12.00% 15	18.40% 23	7.20% 9	125	2.23
Garden	4.65% 6	2.33% 3	13.95% 18	24.03% 31	55.04% 71	129	4.22

Q4 Single-family housing:

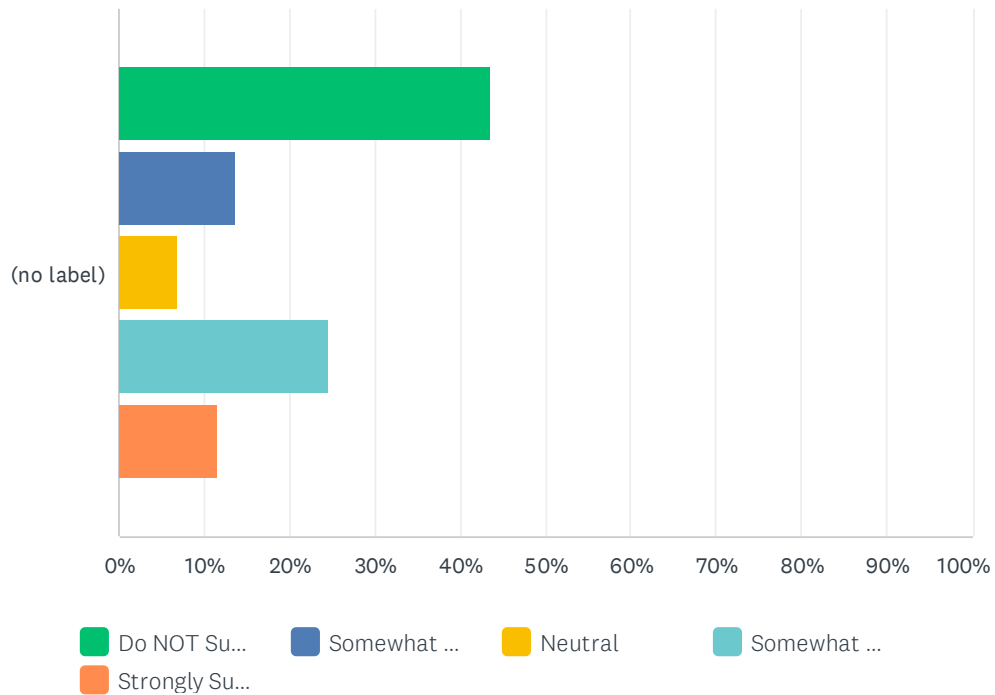
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	16.79% 22	5.34% 7	13.74% 18	32.82% 43	31.30% 41	131	3.40

Q5 Multiple side-by-side single-family housing:

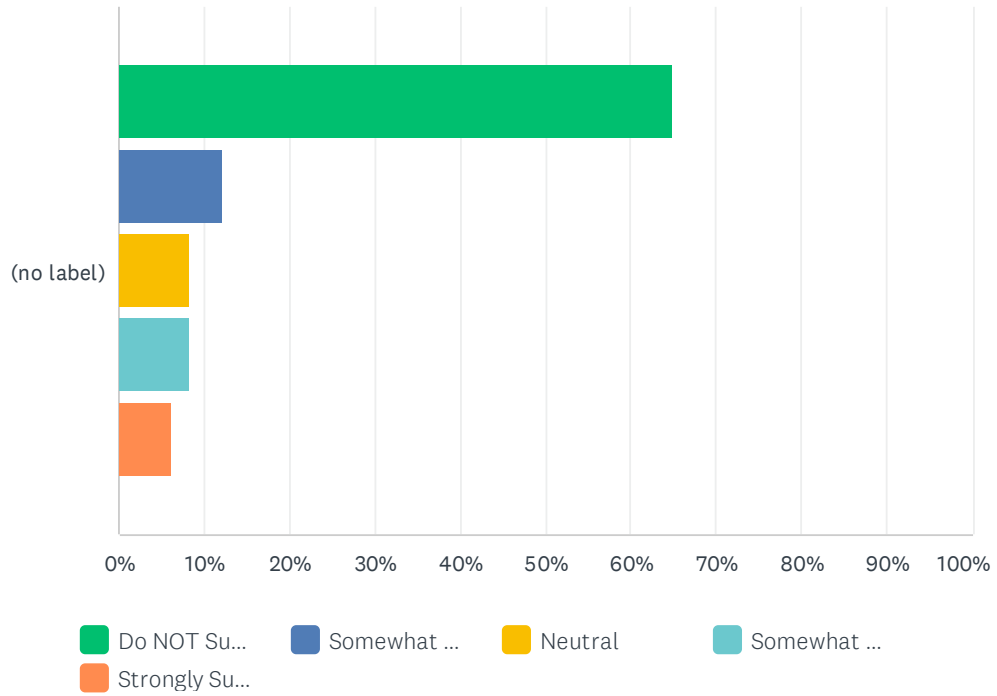
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	43.51% 57	13.74% 18	6.87% 9	24.43% 32	11.45% 15	131	2.03

Q6 Residential rental row housing:

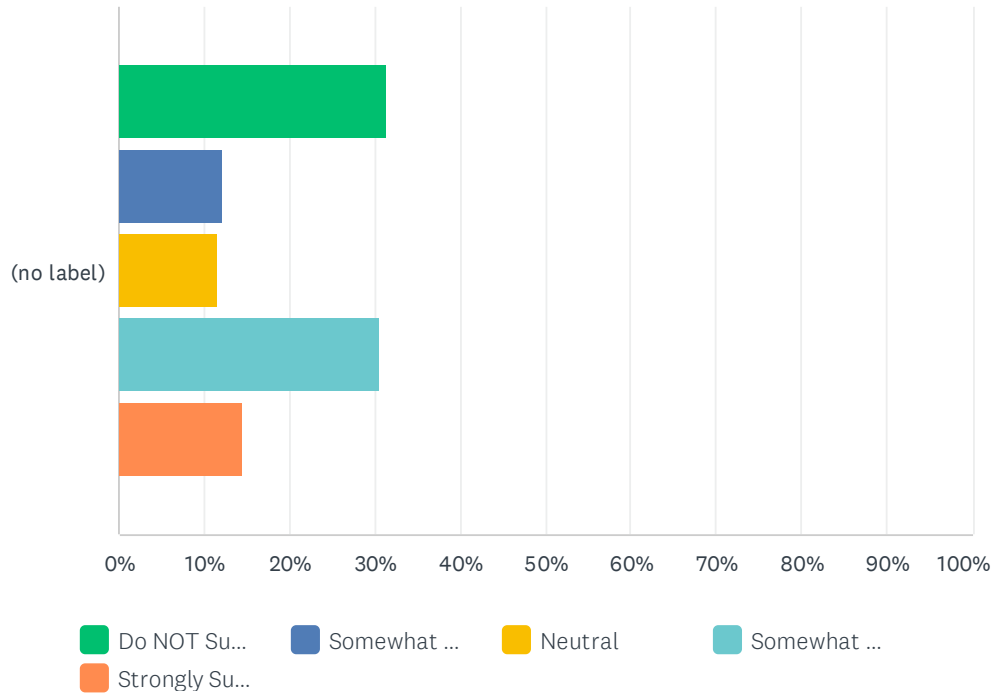
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	64.89% 85	12.21% 16	8.40% 11	8.40% 11	6.11% 8	131	1.14

Q7 Duplex housing:

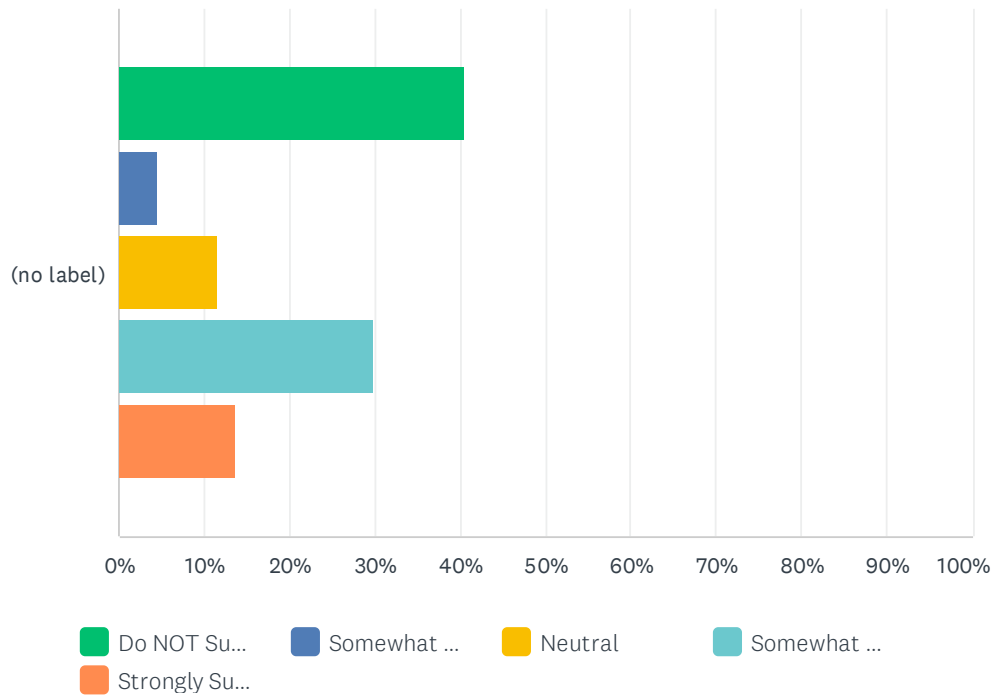
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	31.30% 41	12.21% 16	11.45% 15	30.53% 40	14.50% 19	131	2.53

Q8 Commercial / residential mixed use:

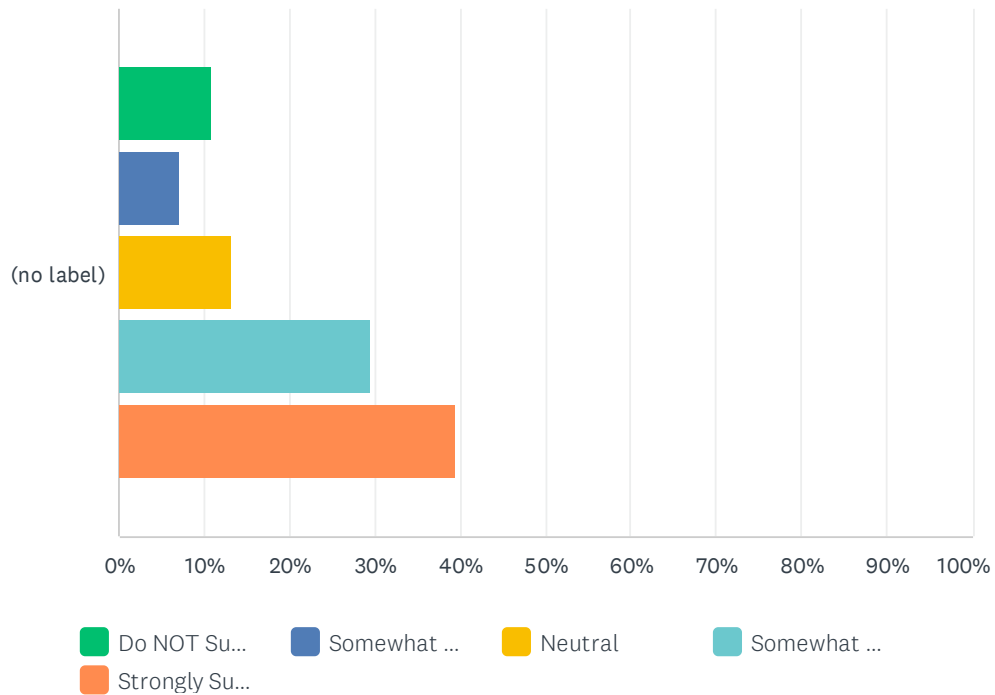
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	40.46% 53	4.58% 6	11.45% 15	29.77% 39	13.74% 18	131	2.31

Q9 Open Space:

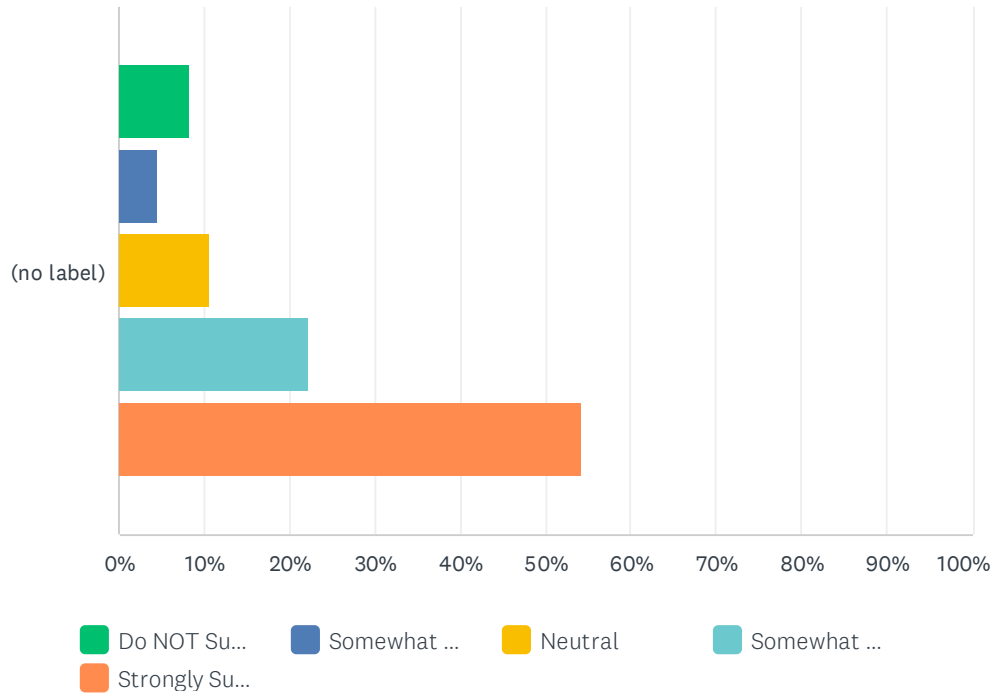
Answered: 129 Skipped: 2



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	10.85% 14	6.98% 9	13.18% 17	29.46% 38	39.53% 51	129	3.69

Q10 Community garden:

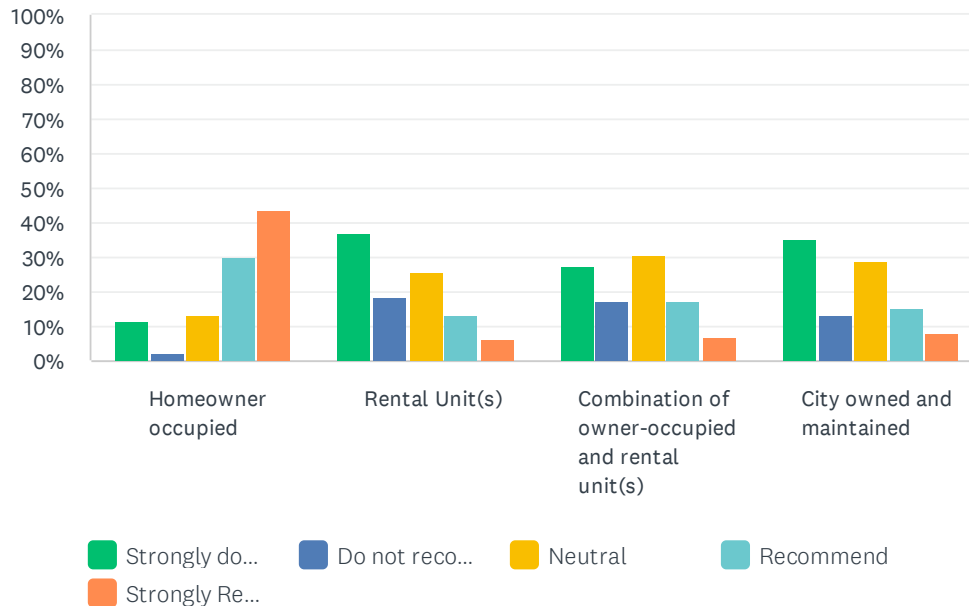
Answered: 131 Skipped: 0



	DO NOT SUPPORT	SOMEWHAT UNSUPPORTIVE	NEUTRAL	SOMEWHAT SUPPORTIVE	STRONGLY SUPPORT	TOTAL	WEIGHTED AVERAGE
(no label)	8.40% 11	4.58% 6	10.69% 14	22.14% 29	54.20% 71	131	4.01

Q11 If you are supportive of housing development, to what extent do you recommend the following ownership structures?

Answered: 131 Skipped: 0

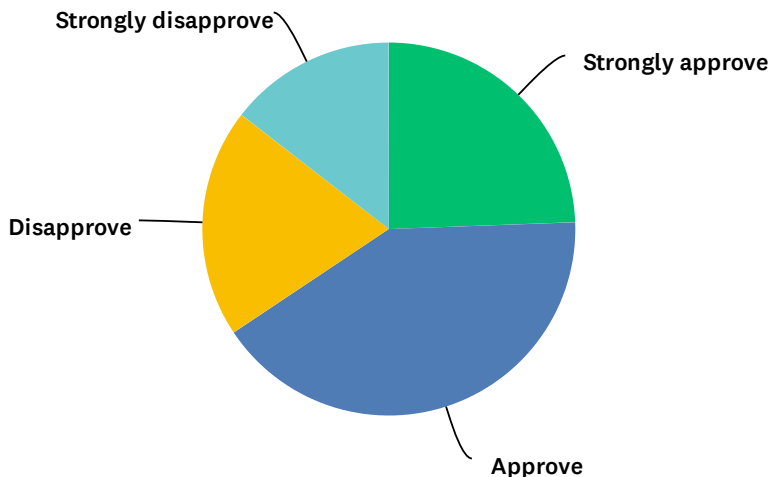


	STRONGLY DO NOT RECOMMEND	DO NOT RECOMMEND	NEUTRAL	RECOMMEND	STRONGLY RECOMMEND	TOTAL	WEIGHTED AVERAGE
Homeowner occupied	11.45% 15	2.29% 3	12.98% 17	29.77% 39	43.51% 57	131	3.92
Rental Unit(s)	36.64% 48	18.32% 24	25.95% 34	12.98% 17	6.11% 8	131	2.34
Combination of owner-occupied and rental unit(s)	27.48% 36	17.56% 23	30.53% 40	17.56% 23	6.87% 9	131	2.59
City owned and maintained	35.11% 46	12.98% 17	29.01% 38	15.27% 20	7.63% 10	131	2.47

#	OTHER (PLEASE SPECIFY)	DATE
1	Coffee shop, rent to own	9/26/2025 6:48 PM
2	I'm in favor of a city-maintained park or green space. It has been proven that such spaces enhance mental health and reduce crime.	9/25/2025 10:04 PM
3	Get rid of building's on main street making town look bad they're ran down and full of garbage	9/24/2025 5:47 PM
4	Rent controlled or HUD Housing	9/24/2025 4:13 PM
5	I would like to see more housing units- but not section 8 only like this area seems to be.	9/24/2025 12:08 PM
6	Harper and Madison coffee shop would be good	9/23/2025 7:50 PM

Q12 How do you feel about the City of Billings donating the property to a local nonprofit organization to redevelop and manage?

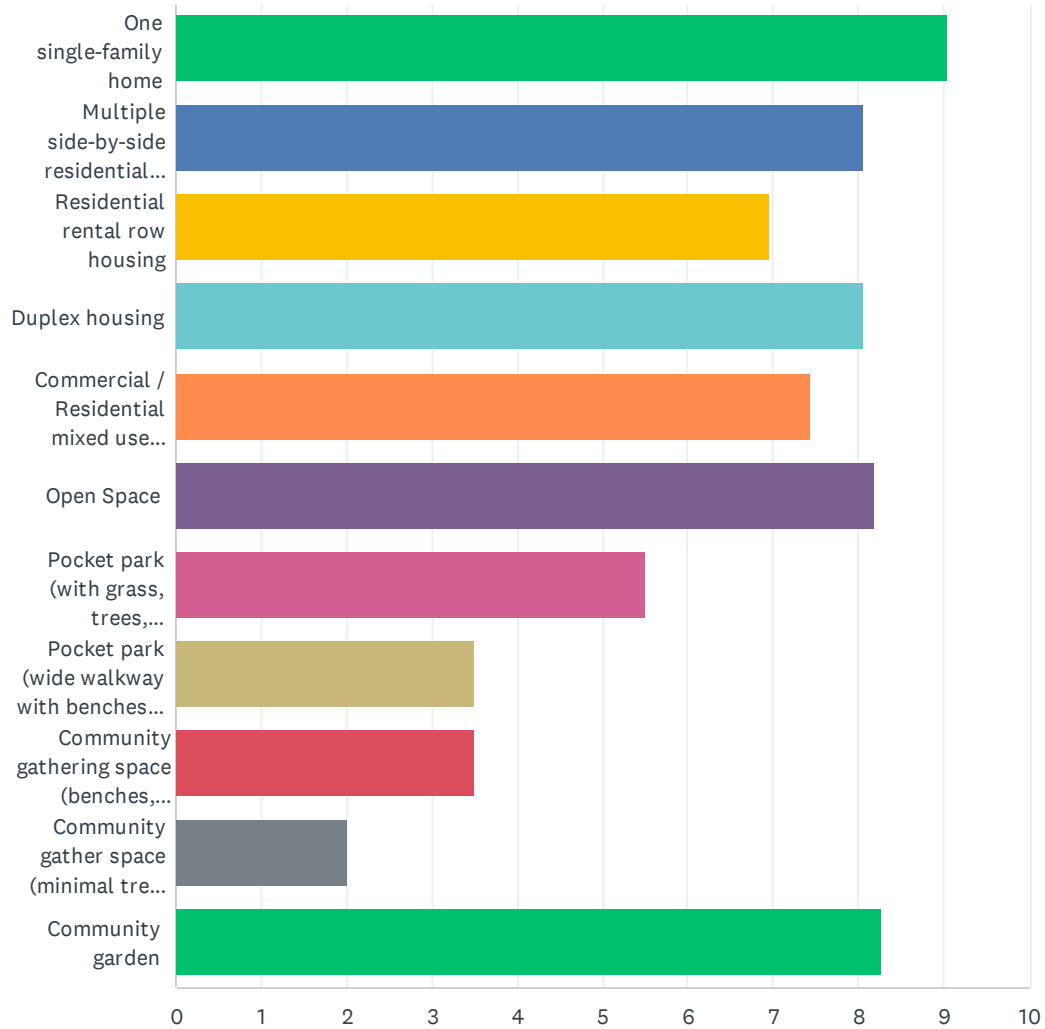
Answered: 131 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly approve	24.43%	32
Approve	41.22%	54
Disapprove	19.85%	26
Strongly disapprove	14.50%	19
TOTAL		131

Q13 Please rank the following options for the property. 1 = least desirable; 10 = most desirable

Answered: 131 Skipped: 0



802 Yellowstone Avenue Neighborhood / Community Input Survey

	1	2	3	4	5	6	7	8	9	10	11
One single-family home	32.82% 43	9.92% 13	24.43% 32	12.21% 16	9.16% 12	5.34% 7	6.11% 8	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Multiple side-by-side residential homes	10.69% 14	13.74% 18	16.79% 22	14.50% 19	21.37% 28	19.08% 25	3.82% 5	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Residential rental row housing	5.34% 7	7.63% 10	16.03% 21	8.40% 11	9.92% 13	16.79% 22	35.88% 47	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Duplex housing	3.05% 4	19.08% 25	13.74% 18	29.01% 38	19.85% 26	10.69% 14	4.58% 6	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Commercial / Residential mixed use building	9.16% 12	6.11% 8	12.98% 17	17.56% 23	19.08% 25	16.03% 21	19.08% 25	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Open Space	13.95% 18	26.36% 34	7.75% 10	8.53% 11	16.28% 21	14.73% 19	12.40% 16	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Pocket park (with grass, trees, playground, etc.)	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	50.00% 1	50.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Pocket park (wide walkway with benches, trees, lighting, etc.)	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	50.00% 1	50.00% 1	0.00% 0	0.00% 0
Community gathering space (benches, artwork, lighting, no grass)	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	50.00% 1	50.00% 1	0.00% 0	0.00% 0
Community gather space (minimal trees, no grass / colorful)	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00% 2	0.00% 0
Community garden	25.19% 33	17.56% 23	8.40% 11	9.92% 13	4.58% 6	16.79% 22	17.56% 23	0.00% 0	0.00% 0	0.00% 0	0.00% 0

Q14 Please share any other comments or suggestions you have about the redevelopment of 802 Yellowstone Ave.

Answered: 41 Skipped: 90

#	RESPONSES	DATE
1	Have you reached out to Habitat for Humanity? They could use the lot for building a house. Also, what about Veterans Navigation Network. What if they developed the space into a park to honor Gold Star Families?	9/30/2025 10:06 AM
2	This lot seems too small for multiple residences.	9/27/2025 4:15 PM
3	A community garden would be so great for that area. The Yellowstone, Clark and Wyoming neighbors are already a great bunch of people and a garden would serve as such a great addition	9/27/2025 8:37 AM
4	Small lot. Sell it and absolve the city from having to deal with it or leave it open for neighborhood kids to play on or community garden. Problem with garden is too much shade from established foliage.	9/26/2025 8:47 PM
5	A coffee shop or something for the neighborhood to enjoy. A community garden would be awesome. A rent to own for someone in the neighborhood that is looking to but an affordable home in a great neighborhood.	9/26/2025 6:48 PM
6	A small park/green space as this is a very family-centric neighborhood.	9/25/2025 10:04 PM
7	My top choice would be for an open space or community garden. I live on Alderson and pass by daily. The space would bring a good benefit to the neighborhood and the rentals adjacent. Providing access to a green space in replace for a brick/concrete building in decay. Thank you for working on this, I am excited to see the change.	9/25/2025 6:17 PM
8	You always just sell the property to the owner (Lisa Cox) next door at 820 8th St West	9/25/2025 1:07 PM
9	N/A	9/25/2025 11:47 AM
10	It's a nice neighborhood, it need not be exploited for money from a rental company	9/25/2025 8:25 AM
11	Community gardens in the area can be extremely beneficial to lower income families in the area and help beautify the city. I have seen it successfully done in Milwaukee. Often times it can give the children safe activities and help feed them healthy food and instill work ethic.	9/25/2025 2:58 AM
12	It would be nice to see another local business take that place. Such as, another butcher, sandwich or coffee shop. It has side parking and is in a great walking distance. I know star bucks up the street is constantly busy. If not, a purchased home or park would be best. The area is mixed with rentals and owned property. You can clearly tell which is which.	9/24/2025 9:24 PM
13	Affordable tiny homes possibly?	9/24/2025 5:09 PM
14	Dog park	9/24/2025 5:03 PM
15	Low rent housing is needed for our city.	9/24/2025 3:23 PM
16	Thank you for this opportunity to give input. We have lived on the 700 block of Clark Avenue for over 20 years and have always wanted to see that property improved.	9/24/2025 1:44 PM
17	Mini-park with sandbox and climbing gear with music choices	9/24/2025 12:24 PM
18	I would like to see a nice property/units here that are not section 8 only. This area is a lot people who don't see to care and it would be a nice change to see a nice unit built.	9/24/2025 12:08 PM
19	Given the size of the property the only option is a single family or duplex	9/24/2025 10:33 AM
20	Good Luck. Let's Brighten this neighborhood.	9/24/2025 9:23 AM
21	stop making housing more unaffordable by using land as "green space" or a community garden	9/24/2025 8:26 AM

802 Yellowstone Avenue Neighborhood / Community Input Survey

what a waste. community gardens are for churches and other places that have land not being used not prime real estate where multiple families could live.

22	Thank you for creating this survey and asking for input!	9/24/2025 7:19 AM
23	We have a lot of kids around here, a garden or park would be great for them as well as the beauty of our neighborhood.	9/24/2025 7:05 AM
24	If housing is built please don't let it be modern architecture. Architecture must fit in with existing homes.	9/24/2025 2:31 AM
25	It would also make a good space for a community art building or community yoga. I would also like a park or garden.	9/23/2025 8:35 PM
26	Thank you!! This is so exciting for the neighborhood	9/23/2025 8:22 PM
27	Very close to a busy road. Open space, gardens will cause bad behavior in the neighborhood.	9/23/2025 8:11 PM
28	Donate the land to bonini construction and I will build housing that can be rented at below market value. To be stipulated with an agreement with the city. I have a proven record for building quality infill multi-family projects as done on 10th and Wyoming and 13th and Lynn and 10th avenue North and 22st to name a few.	9/23/2025 8:06 PM
29	so glad the meat locker is no longer, thank you	9/23/2025 7:50 PM
30	Make it a park with a jungle gym	9/23/2025 7:48 PM
31	Please maintain character of neighborhood if residential structures are built. Commercial business, if allowed, should be low traffic so as not to impact neighborhood parking since Lewis can't be parked on.	9/23/2025 7:11 PM
32	If city owned and maintained need guarantee it would be maintained Existing home owners have buyin on sale or donation	9/10/2025 3:04 PM
33	Single family owner on property Garden	9/10/2025 2:42 PM
34	If this place becomes a car wash or casino, so help me. PLEASE make it into something that actually benefits this city. You have an opportunity to make something nice for Billings and this neighborhood, don't ruin it!	9/8/2025 3:42 PM
35	A market like Poly Food Basket would be amazing!	9/7/2025 2:57 PM
36	Park	9/4/2025 9:08 AM
37	Considering the location in a primarily residential part of Billings, keeping the space in line with the community should be high priority.	9/4/2025 9:01 AM
38	Please turn it into a park so the kids that live in the neighborhood have a safe place to play	9/4/2025 8:19 AM
39	Turn it into a small dog park a there are no dog parks in the area	9/4/2025 8:15 AM
40	Please make it a playground. A small park for the neighborhood. This is a walkable neighborhood with lots of people that walk their dogs and let their kids play near the street. A green space, with benches, playground would be amazing!	9/4/2025 8:13 AM
41	Thanks for doing something with this property!	8/13/2025 4:00 PM

JANUARY 31, 2025



Prepared By:

Granite Peak Environmental

PO Box 2344

Havre, Montana 59501

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

**MEAT HOUSE AND LOCKERS
802 YELLOWSTONE AVENUE
BILLINGS, MONTANA 59101**

Big Sky Economic Development
Brownfields Program
201 North Broadway
Billings, MT 59101

406.860.8407

Analysis of Brownfield Cleanup Alternatives

Meat House and Lockers
802 Yellowstone Avenue
Billings, MT 59101

Prepared For:
Big Sky Economic Development
201 North Broadway
Billings, MT 59101

Prepared By:
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January 31, 2025



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1.0 Introduction

Granite Peak Environmental, LLC (Granite Peak) prepared this Analysis of Brownfields Cleanup Alternatives (ABCA) in anticipation of environmental cleanup at the Meat House and Lockers Property (site) in Billings, Montana (**Figure 1**). Big Sky Economic Development (BSED) was awarded a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant to assist landowners in the remediation of Brownfields sites within Yellowstone County. A Pre-Demolition Survey completed by Northern Industrial Hygiene (NIH) in 2024 revealed asbestos-containing materials (ACMs) at the site. A subsequent Phase II Environmental Site Assessment (ESA) completed by Granite Peak in 2025 revealed lead-based paint (LBP) and universal and biological wastes at the site. This ABCA identifies abatement options for the cleanup of the hazardous building materials at the site to allow for future site redevelopment.

2.0 Site Background

The site is a 0.118-acre lot located at 802 Yellowstone Avenue in Billings, Montana (**Figure 1**). It is situated west of downtown Billings at the southwestern corner of North 8th Street and Yellowstone Avenue and contains a single commercial building totaling approximately 4,500 square feet (**Figure 2**). The rectangular building is a single-story structure that was originally built in 1948 and has had several additions throughout the years. Recent site conditions documented during the 2025 Phase II ESA (Granite Peak, 2025) are included in the photograph log provided as **Appendix A**.

The site was originally constructed and used as a meat processing, packaging, and storage facility. The business has been inoperable for many decades. The building was used by the previous owner as a woodworking space and for personal storage for several years before it was acquired by the City of Billings (City) in December of 2024. The City would like to remove all hazards, demolish the building, and develop the condemned property into a beneficial space for the surrounding community.

2.1 Known Contamination

A Pre-Demolition Asbestos Survey of the building was completed by NIH in May 2024. The purpose of this survey was to identify any asbestos-containing materials in the interior and exterior portions of the on-site structure, including the roof. NIH identified 37 homogenous building materials that were suspected of containing asbestos (NIH, 2024). Of these 37 materials, laboratory analysis confirmed 11 materials contained asbestos at a concentration of greater than one percent (>1%) and three materials contained asbestos at a concentration of less than one percent (<1%). The locations of the 11 confirmed ACMs (>1% asbestos) are shown in **Figures 3** and **4**. Descriptions of the ACMs and the materials containing <1% asbestos that were identified by NIH during the pre-demolition survey are shown in the table below.

Identified Asbestos Containing Materials, Meat House Facility

Sample ID	Material Description	Location	Approximate Quantity	Asbestos Type	Asbestos Content	Regulatory Category
F1.1	Vinyl Sheet Flooring – Tan Small Pebble Pattern w/ Inseparable Mastic/Leveler	North-to-South Hallway	36 ft ²	Chrysotile	Vinyl – 20% Mastic/Leveler – 4%	RACM
F1.2	Vinyl Sheet Flooring – Beige Large Pebble Pattern	East-to-West Hallway	190 ft ²	Chrysotile	20%	RACM
F1.3	Vinyl Sheet Flooring – Red-brick Design w/ Brown/Tan Mastic/Underlayment (Mastic/Underlayment does not contain asbestos)	Westernmost Bathroom	40 ft ²	Chrysotile	Vinyl – 20% Mastic/Underlayment - ND	RACM
F2.1	12"x12" Vinyl Floor Tile – Stone Pattern w/ Inseparable Mastic	Hallway Closet	32 ft ²	Chrysotile	3%	Category I
F3.1	9"x9" Vinyl Floor Tile – Tan w/ Brown/Black Mastic (Mastic does not contain asbestos)	Entry Hallway	351 ft ²	Chrysotile	Tile – 3% Mastic – ND	Category I
M1.2	Built-up Roofing	Center of Building	2,312 ft ²	Chrysotile	Roofing 1/Silver Paint – 1% Roofing 2 – ND Roofing 3 – 2% Roofing 4 – 4% Roofing 5/Tar – 15% Insulation - ND	Category I
M8.4	Black Window Caulk	Windows	7 Window Systems	Chrysotile	20%	Category II
M8.5	Door Frame Caulk	Doors	4 Door Systems	Chrysotile	4%	Category II
M8.6	Exterior Window Caulk	Windows	7 Window Systems	Chrysotile	16%	Category II
M8.8	Roof Sealant (Black)	Roof (Flashing and Roof Penetrations on all Roof Types)	Entire Roof System	Chrysotile	10%	Category I
M20.6	Silver Paint on Metal Debris	Center of Building; Room w/ wood floors & Western end of building beneath covering	Small Quantities of Removable Items	Chrysotile	3%	Category II
F5.1	Residual Black Mastic	Entry Hallway	240 ft ²	Chrysotile	<1%	OSHA
M3.1	Gypsum Board System	Easternmost Bathroom, East-to-West Hallway, & Entry Hallway	312 ft ²	Chrysotile	0.75% - 1.25%	RACM
M8.3	Window Glazing Compound	Windows	7 Window Systems	Chrysotile	<1%	OSHA
ND = Non-detect NESHAP Category Descriptions: Category I: Non-friable ACM Category II: Non-friable ACM, excluding Category I materials OSHA: Building materials not currently regulated by EPA or DEQ, but are regulated under 29 CFR 1926.1101						

Granite Peak subsequently completed a Phase I ESA in September 2024 at the facility. The assessment concluded that while hazardous building materials such as asbestos and LBP are not considered recognized environmental conditions (RECs), such materials may be present in the on-site structure due to its age. Granite Peak recommended a supplemental building materials investigation (BMI) to (1) confirm that all ACMs had been identified by NIH, (2) quantify the

materials, and (3) identify other hazardous materials associated with the building such as LBP, polychlorinated biphenyl (PCB)-containing light ballasts, and/or mercury-containing thermostats and fluorescent light tubes (Granite Peak, 2024).

The supplemental BMI was completed by Granite Peak in January 2025. This investigation quantified each ACM identified in NIH's 2024 survey and determined that no other materials suspected of containing asbestos were present in the building. The investigation also included an exterior LBP survey that revealed two areas with building materials coated with LBP (**Figure 5**). Laboratory analysis showed lead concentrations in soil beneath identified LBP areas were below DEQ direct contact and leaching to groundwater thresholds. A visual survey for universal wastes identified several fluorescent light fixtures, which are assumed to have PCB-containing light ballasts and mercury-containing light tubes. The investigation also noted potential biological hazards associated with the site including human waste and nuisance dust associated with the dilapidated interior conditions of the building (Granite Peak, 2025).

3.0 Cleanup Standards

When left intact and undisturbed, ACMs do not pose a health risk to people working or living in buildings or homes. However, if ACMs are disturbed by fire, renovation, or demolition activities, they may become friable and capable of releasing asbestos fibers into the air resulting in potentially significant health concerns for the community by inhalation of asbestos fibers. Inhaled fibers can become entrapped in the lungs and cause diseases such as asbestosis, lung cancer, and mesothelioma. Potential human exposure pathways for LBP and lead in soil include inhalation of lead in dust or ingestion of lead in dust, soil, or groundwater.

The cleanup requirements for asbestos on a commercial structure in Montana are found in 40 Code of Federal Regulations (CFR) 61.140-157, also known as the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP), and Chapter 74 of the Administrative Rules of Montana (ARM).

Lead exposure can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain. There is also evidence that lead exposure can result in cancer in adults.

LBP must be remediated in accordance with the Resource Conservation and Recovery Act (RCRA). In general, substrates having lead concentrations of 0.5% by weight or 5,000 milligrams per kilogram (not risk based) identifies the substrate as a LBP. Waste materials generated during lead abatement containing leachable lead above the RCRA TCLP limit of 5.0 mg/L may also be a hazardous waste, requiring special waste handling. However, if a building is demolished in its entirety, the Montana Department of Environmental Quality (DEQ) Solid Waste Division and EPA allow the waste generated to be disposed of in a Class II landfill even while containing LBP components. DEQ has determined that components coated with LBP for a whole building demolition are less likely to be hazardous due to the ratio of LBP to the total mass of the waste stream. DEQ guidance concerning this issue is included in **Appendix B**.

3.1 Applicable Laws

This section summarizes the laws and regulations that are applicable to the proposed cleanup.

3.1.1 Asbestos

Applicable codes, regulations, and laws that govern asbestos remediation/cleanup work and transport/disposal of asbestos-contaminated wastes include the following:

- CFR Publications:
 - OSHA 29 CFR 1926.1101 Construction Industry Standard (1994)
 - OSHA 29 CFR 1926.500 Guardrails, Handrails, and Covers
 - OSHA 29 CFR 1910.134 Respiratory Protection
 - OSHA 29 CFR 1910.145 Specifications for Accident Prevention Signs and Tags
 - EPA 40 CFR 61 Subpart A, General Provisions
 - EPA 40 CFR 61 Subpart M, National Emission Standard for Hazardous Air Pollutants
 - EPA 40 CFR 763.120, 121 Asbestos Abatement Projects
 - EPA 40 CFR 763 Subpart E, Asbestos Hazard Emergency Response Act Asbestos-Containing Materials in Schools
- ANSI Publications:
 - Z9.2-1979 Fundamentals Governing the Design and Operations of Local Exhaust Systems
 - Z88.2-1980 Practices for Respiratory Protection NIOSH Revised Recommended Asbestos Standard
- EPA:
 - 560/5-85-024 Guidance for Controlling Friable Asbestos-Containing Materials in Buildings
- State Requirements:
 - Chapter 74 Administrative Rules of Montana
 - Applicable sections of the Asbestos Work Practices and Procedures Manual, (2005)

3.1.2 Lead

Applicable codes, regulations, and laws that govern lead remediation/cleanup work and transport/disposal of lead-contaminated wastes include the following:

- CFR Publications
 - Occupational Safety and Health Administration (OSHA 29 CFR 1926.62 Construction Industry Standard (1994)
 - OSHA 29 CFR 1926.500 Guardrails, Handrails, and Covers
 - OSHA 29 CFR 1910.134 Respiratory Protection
 - OSHA 29 CFR 1910.145 Specifications for Accident Prevention Signs and Tags
 - OSHA 29 CFR 1917.152 Hot Work
- American National Standard Institute (ANSI) Publications:
 - Z88.2-1980 Practices for Respiratory Protection National Institute for Occupational Safety and Health (NIOSH)
- Montana Department of Environmental Quality – Solid Waste Program
 - Lead-Based Paint Disposal Guidance (**Appendix B**)

4.0 Cleanup Alternatives

Granite Peak identified three cleanup alternatives for the site, as follows:

Alternative 1 – No action. Under this alternative, no actions would be taken to abate the hazards associated with the on-site structure. All ACMs, LBP, universal waste, and biological hazards would remain in place.

Alternative 2 – Abate ACMs and LBP with the building remaining. Under this alternative, the building would remain, and hazardous building materials would be addressed as follows:

- *Asbestos-Containing Materials* – All identified ACMs would be abated by a certified abatement contractor with the building in-tact. All abated materials would be removed from the building, properly packaged to prevent the release of asbestos, and hauled to the Billings Regional Landfill for disposal as asbestos-containing waste and RACM, as appropriate.
- *Lead-Based Paint* – All LBP would be stripped and removed from the building by a certified lead-abatement contractor. The LBP waste would be containerized during abatement, sealed, and scheduled for proper transport and disposal as LBP hazardous waste.
- *Universal Wastes* – The fluorescent light tubes and presumed PCB-containing light ballasts would be removed and disposed of in accordance with solid waste regulations.
- *Biological Hazards* – Biological hazards would not be addressed under this alternative.

Alternative 3 – Abate all hazards prior to or during demolition. Under this alternative, the building would be demolished, and hazardous building materials would be addressed as follows:

- *Asbestos-Containing Materials* – Prior to building demolition, RACM and Category II ACMs would be abated by a certified abatement contractor. RACM and Category II ACMs would be properly wrapped (“burrito” wrapped in 6-mil plastic) to prevent the release of asbestos during transportation to the Billings Regional Landfill. During demolition, inert materials (concrete, wood, metal, and glass) would be sorted from the demolition waste stream and disposed of as construction and demolition (C&D) waste at the Billings Regional Landfill. The remaining demolition debris, including Category I ACMs, would be disposed of as asbestos-containing waste at the Billings Regional Landfill. Demolition and abatement would be overseen by a third-party certified abatement supervisor. After demolition, backfilling would occur to bring the site back to grade, as needed.
- *Lead-Based Paint* – Per DEQ guidance (**Appendix B**), LBP would not require abatement under this alternative since it would be included in the waste stream of a whole-building demolition. Contractors performing the demolition would need to be aware of the presence of LBP and LCP and follow lead-safe demolition practices. The demolition would be overseen by a certified lead-risk assessor.
- *Universal Wastes* – The fluorescent light tubes and presumed PCB-containing light ballasts would be removed and disposed of in accordance with solid waste regulations.
- *Biological Hazards* – All biological hazards would be removed from the site during building demolition.

5.0 Evaluation of Alternatives

Each of the alternatives identified for the site are evaluated in this section using three criteria: long-term human health risk reduction, implementability, and costs relative to human health risk reduction. **Table 1**, below, summarizes the evaluation and cost estimates for the three action alternatives. Cost estimates are included in **Appendix C**.

Alternative	Criteria		
	Risk Reduction	Implementability	Cost
Alternative 1 – No Action	None	Implementable	\$0
Alternative 2 – Abate ACMs and LBP with the building remaining	Removes most environmental risks, but some remain on-site; slight risks during cleanup; future health and safety risks remain	Implementable	\$65,236
Alternative 3 – Abate all hazards prior to or during demolition	Removes all future human health and environmental risks; slight risks during cleanup	Implementable	\$58,147

Alternative 1 – No Action. Under this alternative, hazardous building materials would remain in-place, and the unusable, blighted building would continue to pose a public safety risk. Although this option is both cost-effective and implementable, the property could not be redeveloped and the risk of exposure of hazardous materials to the surrounding community would persist.

Alternative 2 – Abate ACMs and LBP with the building remaining. This alternative is implementable and poses limited safety risks to workers abating materials in the building. However, the extent of interior LBP has not been evaluated. Therefore, to implement this alternative, a supplemental LBP survey would be required to properly identify all LBP associated with the interior of the building. Once identified, all LBP would be abated (removed and disposed of as a hazardous waste) or encapsulated and left in place. Disposal costs of the abated LBP would be significantly higher compared to abatement via whole-building demolition (Alternative 3) because the stripped LBP would have to be disposed of as a hazardous waste. OSHA-regulated LCP would not be addressed through this alternative, and any contractors working near LCP during future building renovations would be required to have an awareness for potential lead exposure. OSHA-safe work practices would apply for all future contractors.

This alternative would leave the building in-tact, but in an even worse condition. The roof system would be removed during the ACM-abatement process and would need to be replaced at the owner's expense outside of this abatement project. The building would remain vacant and in poor condition for an unknown period until additional funding was secured to renovate or demolish the building. The vacant building would continue to pose a threat to public safety for the surrounding neighborhood. Biological hazards (human feces) would also remain in place and would likely accumulate until the building was renovated or demolished.

This alternative is less cost-effective than Alternative 3 and would leave biological and lead hazards in place, and the building would remain on the property in a degraded condition. Ultimately, this alternative poses a health and safety risk to the community by leaving the building vacant, with unaddressed hazards and in poor condition, for an undetermined amount of time.

Alternative 3 – Abate all hazards prior to or during demolition. This alternative is implementable, cost effective, and removes all hazardous materials from the site. ACMs would be abated from the building either prior to demolition or at the time of demolition, and LBP would be abated during demolition. By demolishing the building, LBP would be disposed of as C&D waste, saving future supplemental survey and renovation costs, and all biological hazards would be effectively removed from the site. Additionally, this option would remove the public safety risk the currently vacant building poses to the community and would fully prepare the site for future redevelopment for the lowest cost.

6.0 Preferred Alternative

The preferred action is Alternative 3. All hazardous materials including asbestos, LBP, universal waste, and biological hazards would be abated and wastes generated would be disposed of properly in accordance with DEQ and EPA regulations under this alternative. The vacant building would be removed from the site and would no longer pose a potential public safety risk. This alternative is the most cost-effective option and offers the most comprehensive cleanup while minimizing risks to workers and future site occupants. Alternative 3 results in the greatest protection of human health and the environment for the lowest price and best prepares the site for future redevelopment.

Should the landowner proceed with cleanup of the site through the RLF program, BSED would obtain cost estimates from abatement contractors capable of completing Alternative 3. A copy of the final abatement and demolition report describing all abatement completed on the project would be transmitted to BSED and EPA.

7.0 Climate Change and Severe Weather Events

The EPA requires a discussion of whether climate change could be impacted by the preferred alternative. According to the Montana Climate Assessment, climate changes predicted for Montana include:

- Increased mean annual air temperatures with winter and spring temperatures increasing the most
- Increased precipitation in winter, spring, and fall, with decreasing precipitation in summer
- Decreased snowpack with peak runoff occurring earlier
- Increased frequency of flooding
- Increased time of drought
- Increased frequency and longer wildfire seasons
- Decreased carbon capturing forests

The proposed cleanup would not significantly impact the climatic changes described above, except for potentially increasing mean annual temperature through the burning of fossil fuels. The site is not in a floodplain and the preferred alternative would not increase the potential for flooding. It is recommended that equipment used for abatement be turned off when not in use.

8.0 Public Review and Comments

The ABCA would be presented at a public meeting to be held in Billings, Montana, and the public would be notified that the ABCA is available for review. A copy of this document would be available to the public on BSED's website at www.bigskyeconomicdevelopment.org or by request. BSED would document all public comments in writing, provide a response to each comment, and

incorporate relevant comments into the final cleanup design and approach. All comments would be submitted to:

Thom MacLean
Senior Project Manager
Big Sky Economic Development
thom@bigskyeda.org

9.0 References

Northern Industrial Hygiene, Inc. (NIH), 2024. Pre-Demolition Asbestos Survey, Letter Report. Former Meat House Lockers, 802 Yellowstone Avenue, Billings, MT. Northern Project Number 101-169. May 29.

Granite Peak Environmental, LLC (Granite Peak), 2024. Phase I ESA, Meat House and Lockers, 802 Yellowstone Avenue, Billings, Montana 59101. Prepared for Big Sky Economic Development. September 20.

_____, **2025.** Report of Findings, Building Materials Investigation, Meat House and Lockers, 802 Yellowstone Avenue, Billings, Montana 59101. Prepared for Big Sky Economic Development. January 24.



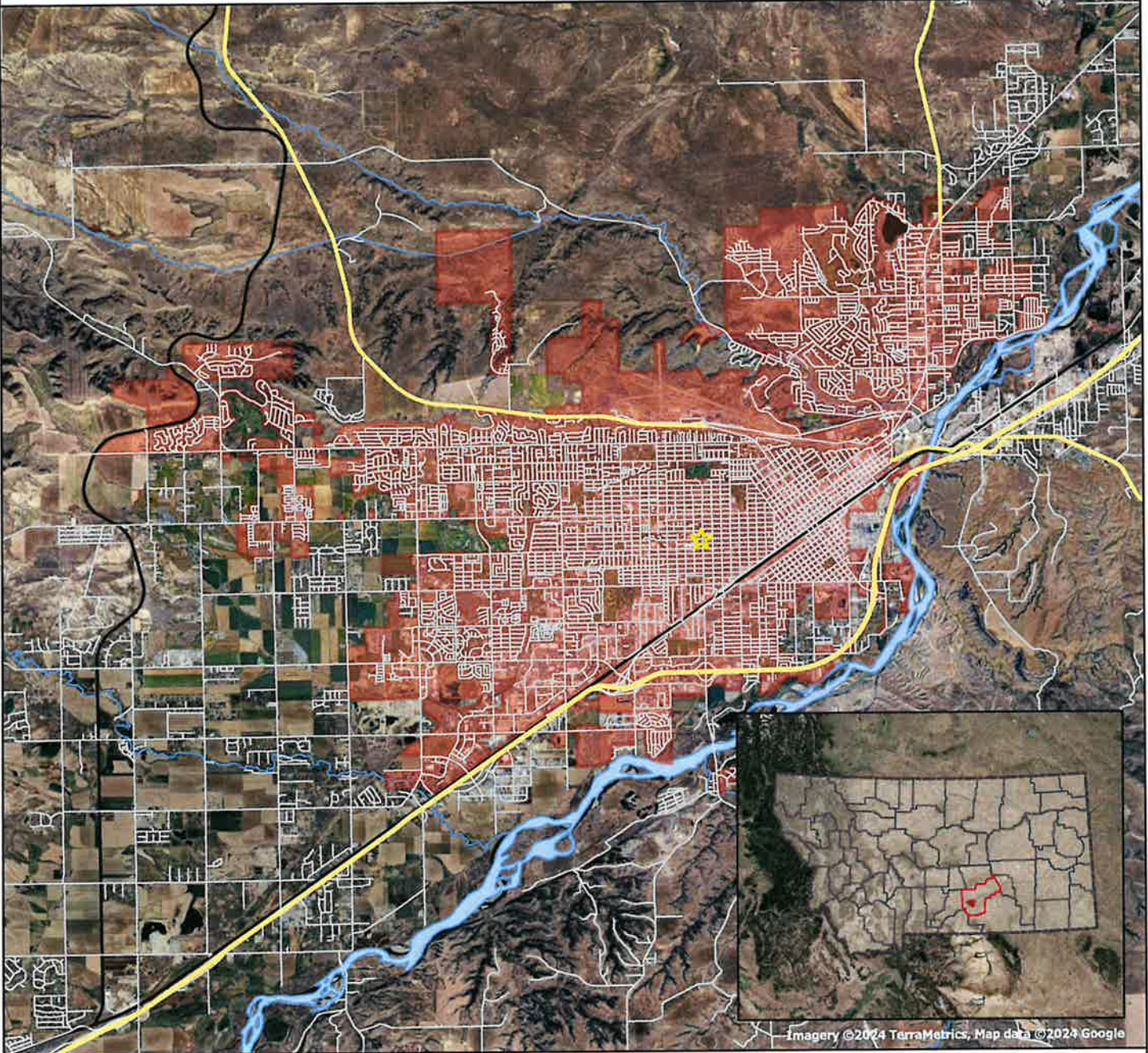
FIGURES

Figure 1 – Area Map
Meat House Property
802 Yellowstone Avenue
Billings, MT 59101



GRANITE PEAK

ENVIRONMENTAL



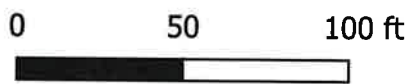
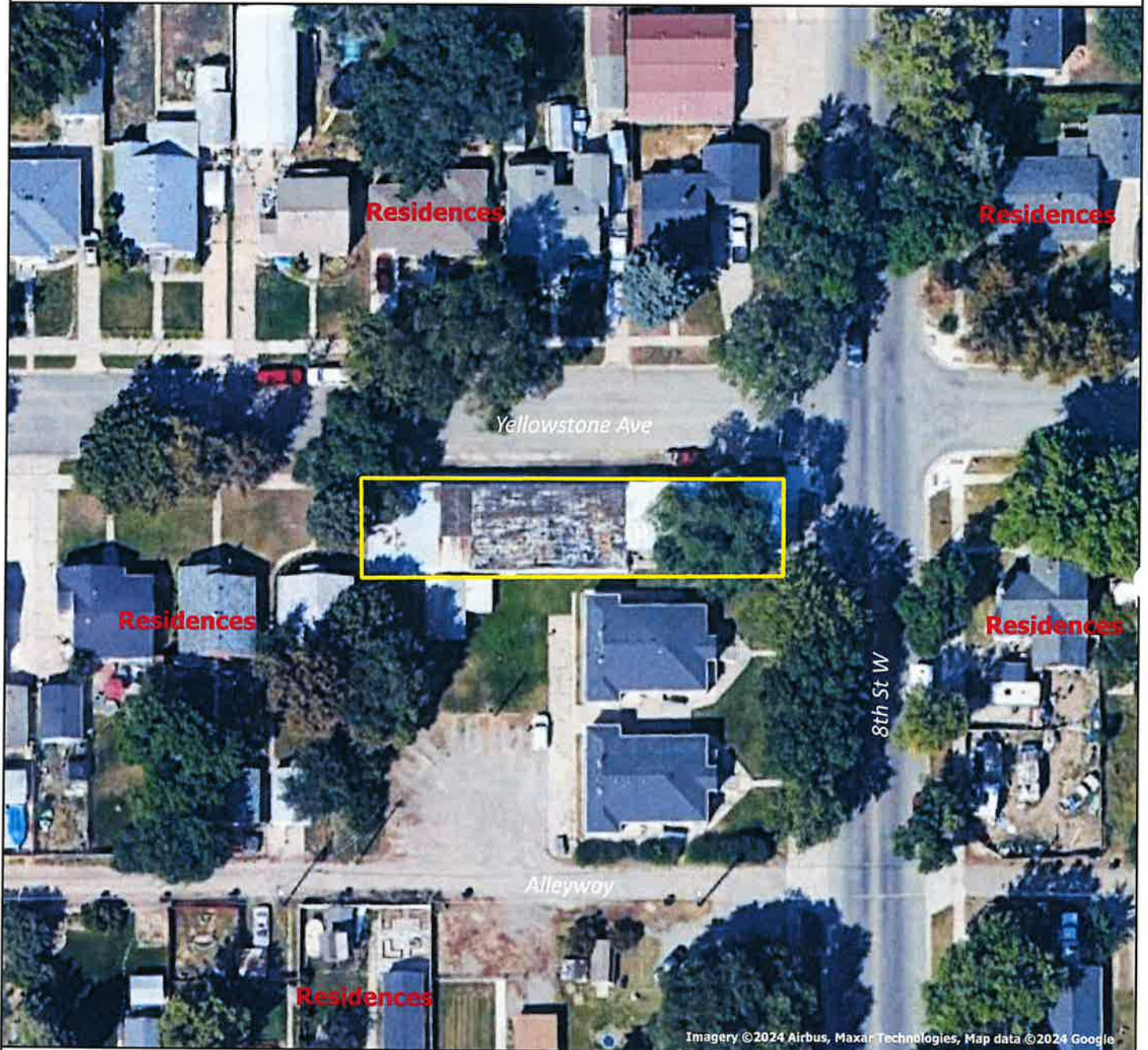
Imagery ©2024 TerraMetrics, Map data ©2024 Google



- Roads
- Major Highways
- Railroad
- Site
- Billings City Limits
- Yellowstone County



Figure 2 – Site Map
Meat House Property
802 Yellowstone Avenue
Billings, MT 59101



 Subject Property Boundary



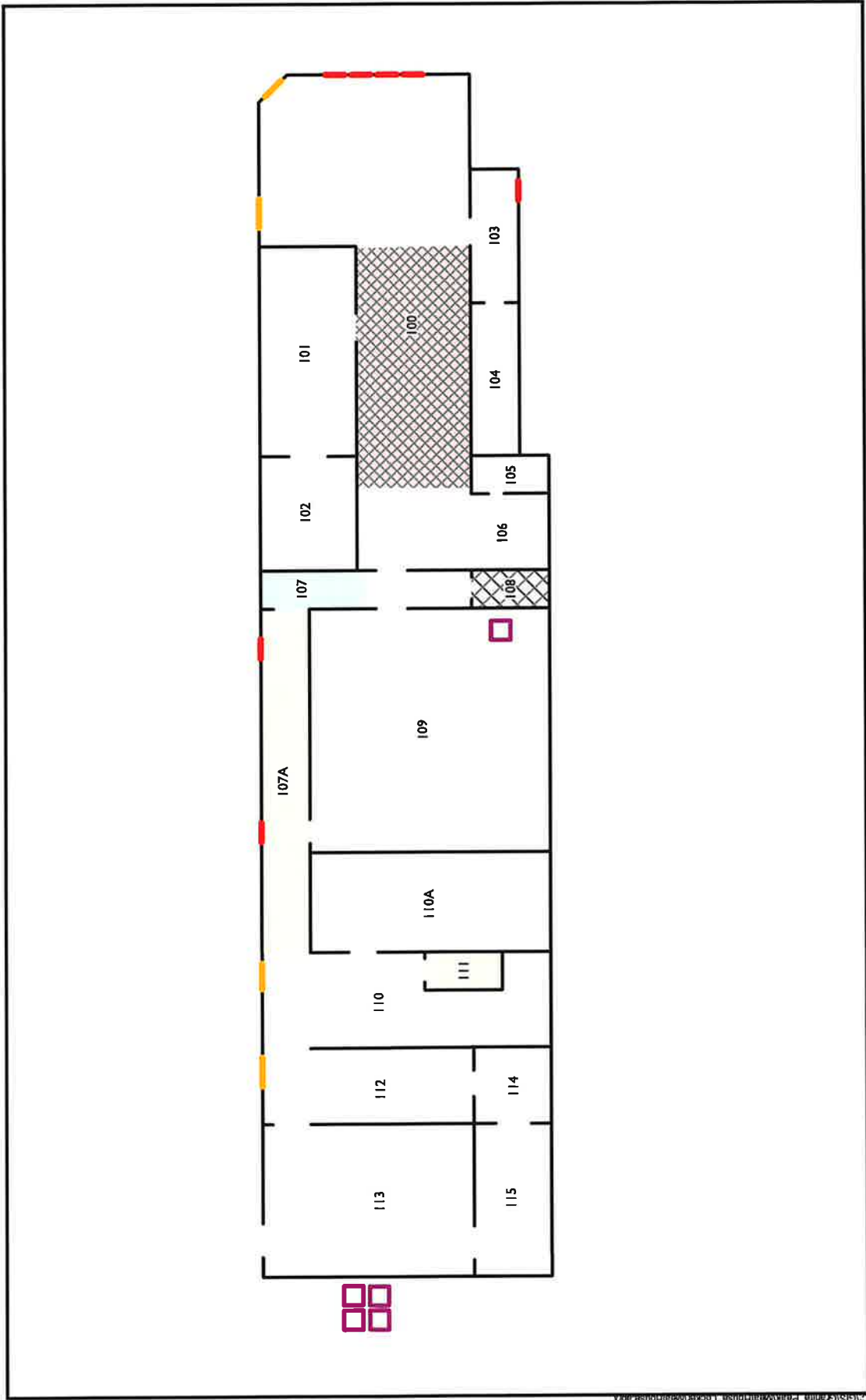


Figure 3 – Positive Asbestos Results
Meat House Property
 802 Yellowstone Avenue
 Billings, MT 59101

-  ACM Door Frame Caulk
-  ACM Window Frame Caulk
-  ACM Silver Paint on Metal Debris
-  ACM 12"x12" Floor Tile & Mastic
-  ACM 9"x9" Floor Tile (Mastic ND)
-  ACM Vinyl Sheet Flooring & Mastic
-  ACM Vinyl Sheet Flooring (No Mastic Present or Mastic ND)



GRANITE PEAK
 ENVIRONMENTAL

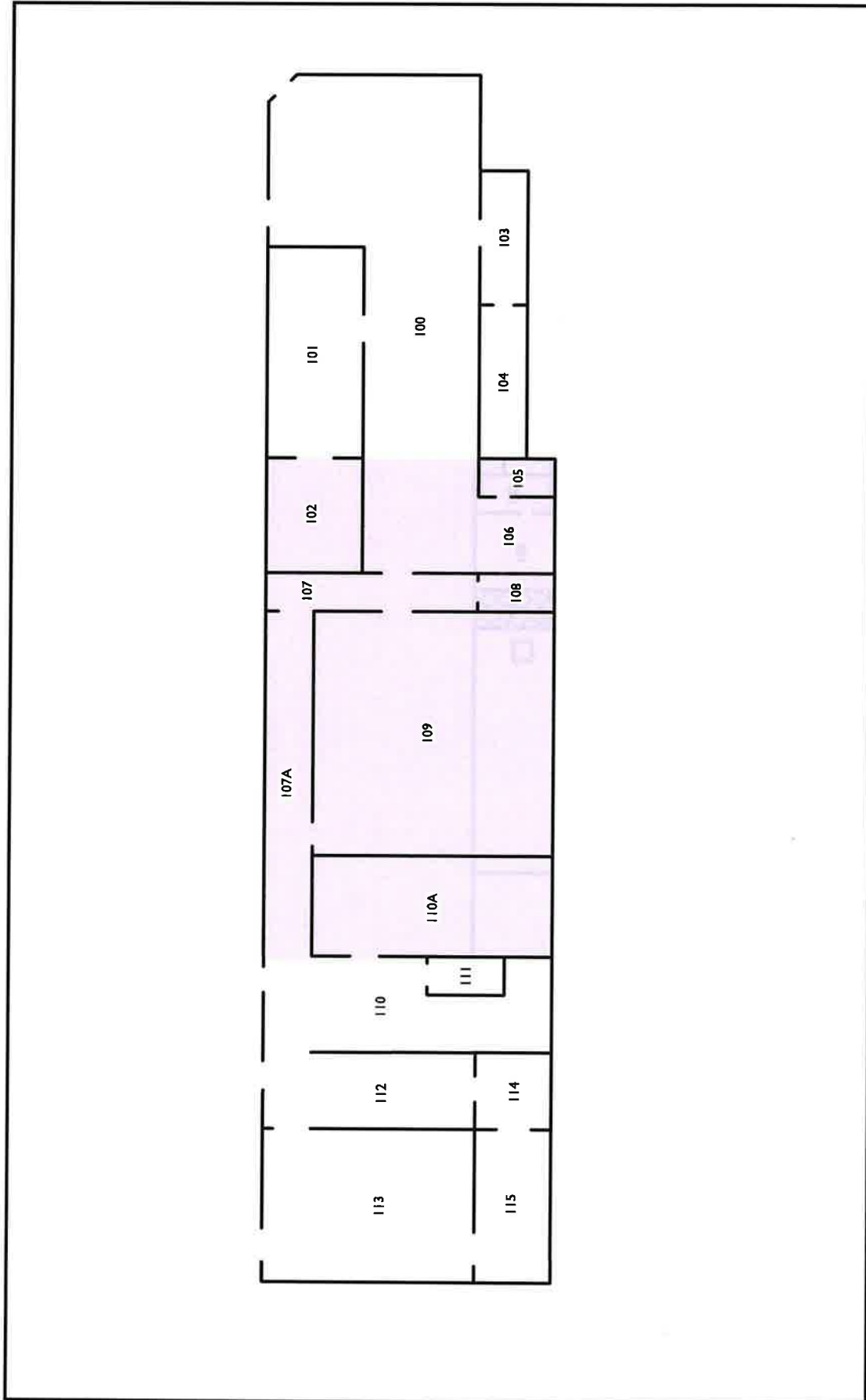


Figure 4 – Asbestos in Roofing Materials
 Meat House Property
 802 Yellowstone Avenue
 Billings, MT 59101

ACY Built-up Roof



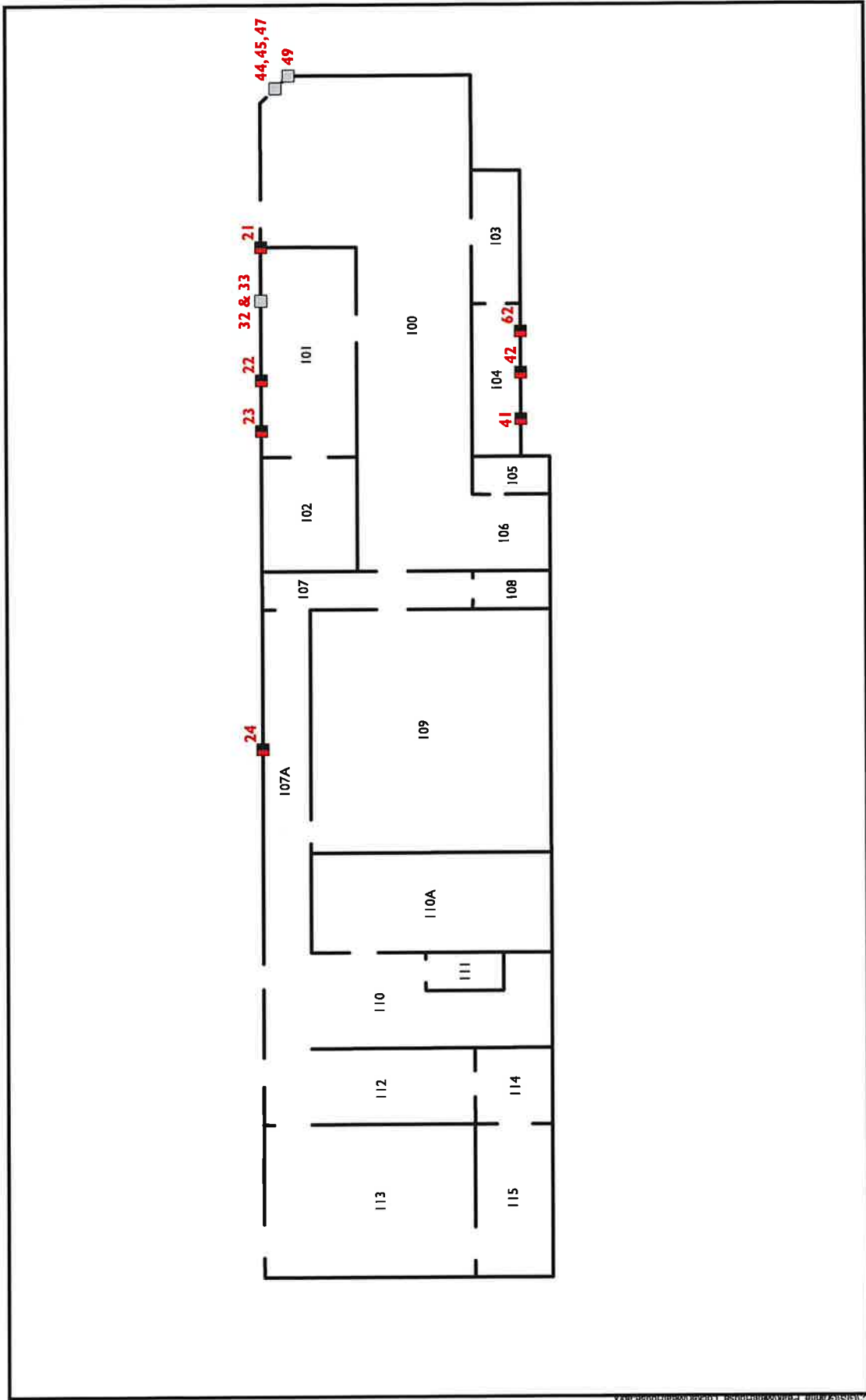





Figure 5 – Lead-based Paint Results
 Meat House Property
 802 Yellowstone Avenue
 Billings, MT 59101

- Sample location positive for Lead-Based Paint
- Sample location positive for Lead-Containing Paint





0 Feet 15



GRANITE PEAK
ENVIRONMENTAL



APPENDIX A
PHOTOGRAPH LOG

INSPECTION PHOTOGRAPH LOG



1) Meat House and Lockers building looking southwest. Select areas of white paint on CMU tested positive for lead.



3) Meat House and Lockers building looking southeast. All substrates tested negative for lead.



2) Meat House and Lockers building looking northwest. Red paint of the Pepsi logo tested positive for lead. One 5-point composite soil sample was collected underneath the logo. Window glazing positive for asbestos on the east facing windows.



4) Meat House and Lockers building looking northeast. White peeling paint on CMU tested negative for lead.

INSPECTION PHOTOGRAPH LOG



5) Meat House and Lockers building looking north at the west end of the building. White paint on CMU tested negative for lead.



7) Close-up of the southwest exterior corner of the Meat House and Lockers building looking east. White paint on CMU, and blue and red paint on wood tested negative for lead.



6) Close-up of the southwest exterior corner of the Meat House and Lockers building looking west. White paint on CMU tested negative for lead.



8) Photograph of the east end of the building. Exterior corrugated sheet metal siding is negative for lead.

INSPECTION PHOTOGRAPH LOG



9) Water damaged sheetrock ceiling confirmed in the south storage area. Green paint on CMU tested negative for lead.



11) Close-up of collapsed roof looking west from the south storage area.



10) Close-up of damaged CMU wall looking west from the south storage area.

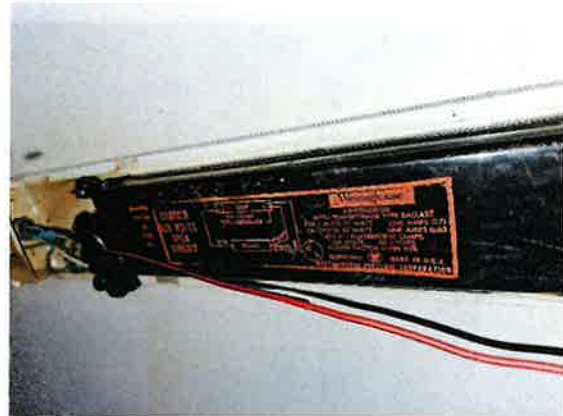


12) Photograph taken inside the east end of the building, looking east. Sheetrock ceiling contains <1% asbestos.

INSPECTION PHOTOGRAPH LOG



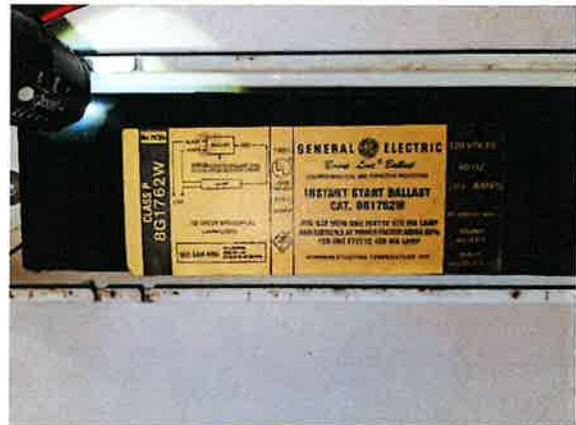
13) Photograph taken inside the north storage area of the east end of the building, looking east.



15) Photo of one type of light ballast presumed positive for PCB's.



14) Photograph showing the poor conditions within the building that may include biological hazards.



16) Photo of one type of light ballast presumed positive for PCB's.

INSPECTION PHOTOGRAPH LOG



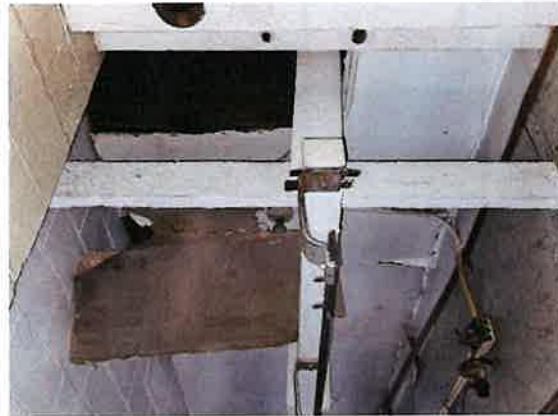
17) Photo of one type of light ballast presumed positive for PCB's.



19) Photograph of the eastmost bathroom. Sheetrock materials contain <1% asbestos.



18) North side of the building underneath the areas that tested positive for lead. Confirmed the LBP is above the concrete sidewalk.



20) Photograph within the east to west hallway. Sheetrock materials contain <1% asbestos.



APPENDIX B
MONTANA LBP DISPOSAL FACT SHEET



RENOVATION & ABATEMENT

- Small-scale debris that is generated during renovation, maintenance, or abatement activities such as paint chips, vacuum debris and dust, waste wash water and sludge from chemical paint stripping is more likely to exceed the TCLP.
- Sampling may be appropriate for intermediate-volume renovation wastes such as window moldings, doors, etc.
- Core or sectional samples can be taken of representative waste items to determine whether each waste is hazardous.
 - Fewer samples could be taken by taking one or more core samples, compiling ratios of waste material surface area to mass for each type, and then comparing these to the surface area/mass ratio of the sample.
 - Sampling protocol should be used for each site.
- Individual waste materials should either:
 - Be sampled and analyzed by TCLP and then handled/disposed of accordingly; or
 - Be segregated from other large-scale debris and then managed as hazardous waste.
- Records of sampling procedures and analytical results must be kept for at least 3 years.



Solid Waste Program

Lead-Based Paint



Montana Department of Environmental Quality

PO Box 200901

Helena, MT 59620-0901



Solid Waste Section

www.deq.mt.gov/Land/solidwaste
406-444-5300

Solid Waste Program (SWP)

deqswprogram@mt.gov
406-444-3463

LEAD-BASED PAINT (LBP)

Where do we find it?

- Prior to the 1950s, paints used for residential use contained up to 50% lead.
- Lead-based paint was used on buildings until 1978, when it was banned on residential structures by the consumer Products Safety Commission.
- Renovation, remodeling, demolition, and surface preparation for painting have the potential to produce hazardous wastes if LBP was involved.



How do we know it is there?

- Test the paint for lead to be certain of the presence of lead.
- Hazardous waste criterion for lead waste is established under the federal Resource Conservation and Recovery Act (RCRA), Subtitle C, as 5.0 mg/L measured with the Toxicity Characteristic Leaching Procedure (TCLP).



STRUCTURE DEMOLITION Residential Structures

Household Hazardous Waste Exemption

- On June 18, 2003, the Environmental Protection Agency (EPA) published a rule under solid waste regulations to streamline LBP debris disposal.

- LBP debris from households generated by homeowners or contractors may be disposed of at a municipal solid waste landfill or and construction and demolition waste landfill.



Non-residential Structures

Waste Determination and Management

- LBP debris that comes from commercial or industrial sources, **not households**, may be subject to state and federal hazardous waste rules.
- The generator of the waste must determine whether the debris falls the TCLP for lead.
- Two scenarios outlined for making the waste determination and then managing the LBP debris are:
 - Whole-Building Demolition
 - Remediation and Abatement

WHOLE-BUILDING DEMOLITION

- Whole-building demolitions debris is considered a non-hazardous waste with regard to lead.
 - EPA stated that solid architectural components coated with LBP are less likely to be hazardous because of the small ratio of lead paint to total waste mass.
 - The US Army conducted a study that concluded that whole-building demolition debris is not likely to exceed the toxicity characteristic standard for lead if it is handled as a single, whole waste stream and disposed of all together.
- No sampling or analysis of painted components for lead is required for disposal as a non-hazardous waste.

NOTE: Constituents other than LBP, including PCBs from light ballasts or asbestos containing materials, may require special handling and should be removed before demolition.



A graphic design for an appendix cover page. It features a central dark blue horizontal bar with the text 'APPENDIX C' and 'COST ESTIMATES' in white. This bar is flanked by two vertical bars, one orange and one dark blue, extending both above and below the central bar. On the left side, there are two white circular punch holes, one on the central bar and one above it.

APPENDIX C
COST ESTIMATES

Cost Estimate
 Alternative 2 - Abate ACMs & LBP with the Building Remaining
 Meat House & Lockers
 802 Yellowstone Avenue, Billings, MT 59101



Material Description	Quantity	Unit	Unit Rate	Total
Task 1: Mobilization, Site Preparation, and Permit				
Mobilization/Site Preparation (Asbestos Abatement Contractor) ¹	1	ls	\$5,000	\$5,000
Pre-clean Building	1	ls	\$8,000	\$8,000
Task 1 Subtotal				\$13,000
Task 2: Asbestos Abatement of All ACMs²				
VSF - North-to-South Hallway	36	sf	\$15	\$540
VSF - East-to-West Hallway	190	sf	\$15	\$2,850
VSF - Westemmost Bathroom	40	sf	\$15	\$600
12"x12" VFT - Hallway Closet	32	sf	\$5	\$160
9"x9" VFT - Entry Hallway	351	sf	\$5	\$1,755
Built-up Roofing	2,312	lf	\$5	\$11,560
Black Window Caulk	7	window systems	\$250	\$1,750
Door Frame Caulk	4	door systems	\$500	\$2,000
Exterior Window Caulk	7	window systems	\$250	\$1,750
Roof Sealant (Black)	1	ls	\$1,500	\$1,500
Silver Paint on Metal Debris	1	ls	\$1,000	\$1,000
Residual Black Mastic	240	sf	\$2	\$480
Gypsum Board System	312	sf	\$5	\$1,560
Window Glazing Compound	7	window systems	\$250	\$1,750
Task 2 Subtotal				\$29,255
Task 3: Lead-Based Paint Survey & Abatement³				
Interior LBP Survey	1	ls	\$3,500	\$3,500
LBP Abatement (three workers for three days)	72	hours	\$125	\$9,000
Abatement Supplies	1	ls	\$800	\$800
LBP Disposal as a hazardous waste	1	ls	\$2,500	\$2,500
Task 3 Subtotal				\$15,800
Task 4: Universal Waste Removal⁴				
Fluorescent light tubes disposal	1	ls	\$250	\$250
PCB Light Ballasts	1	ls	\$1,000	\$1,000
Task 4 Subtotal				\$1,250
Total (All Tasks)				\$59,305
Contingency (10%)				\$5,931
Total Estimated Cost				\$65,236

Notes/Assumptions:

¹ Abatement contractor mobilization includes travel to and from site, lodging, site preparation, project permitting and bonding, site security, traffic control, dust control, Project-Specific Health and Safety Plan preparation, and incidentals (e.g. equipment, tools, plastic sheeling, fuel, etc.) to complete the Project.

² Per unit cost includes disposal of asbestos containing materials at the Billings Landfill.

³ All exterior lead-based paint (LBP) will be abated by the abatement contractor and disposed of as a hazardous waste. To leave building in place, an interior LBP survey would need to be completed, and LBP identified would need to be removed or encapsulated. Costs may vary depending on results of LBP survey.

⁴ Universal waste includes all fluorescent light fixture ballasts which are assumed to contain PCBs and all fluorescent light tubes.

Cost for oversight firm, including bid specifications, air clearance sampling, project oversight, and project reporting is not included in this estimate.

Cost Estimate
 Alternative 3 - Abate All Hazards Prior To or During Demolition
 Meat House & Lockers
 802 Yellowstone Avenue, Billings, MT 59101



Material Description	Quantity	Unit	Unit Rate	Total
Task 1: Mobilization, Site Preparation, and Permit				
Mobilization/Site Preparation (Asbestos Abatement & Demo Contractor) ¹	1	ls	\$7,500	\$7,500
Pre-clean Building	1	ls	\$4,000	\$4,000
Task 1 Subtotal				\$11,500
Task 2: Asbestos Abatement of RACM & Category II ACMs²				
VSF - North-to-South Hallway	36	sf	\$15	\$540
VSF - East-to-West Hallway	190	sf	\$15	\$2,850
VSF - Westernmost Bathroom	40	sf	\$15	\$600
Black Window Caulk	7	window systems	\$250	\$1,750
Door Frame Caulk	4	door systems	\$500	\$2,000
Exterior Window Caulk	7	window systems	\$250	\$1,750
Silver Paint on Metal Debris	1	ls	\$1,000	\$1,000
Gypsum Board System	312	sf	\$5	\$1,560
Task 2 Subtotal				\$12,050
Task 3: Universal Waste Removal³				
Fluorescent light tubes disposal	1	ls	\$250	\$250
PCB Light Ballasts	1	ls	\$1,000	\$1,000
Task 3 Subtotal				\$1,250
Task 4: Building Demolition				
Segregate inert materials (concrete, wood, and metal). Remove all building debris, including Category I ACMs	278	cy	\$50	\$13,900
Hauling (inert materials)	170	tons	\$30	\$5,100
Disposal (inert materials)	170	tons	\$27.80	\$4,726
Hauling (asbestos materials)	11	tons	\$60	\$660
Disposal (asbestos materials)	11	tons	\$102.30	\$1,125
Backfill Excavation to grade (includes material, hauling, and placement) ⁴	85	cy	\$30	\$2,550
Task 4 Subtotal				\$28,061
Total (All Tasks)				\$52,861
Contingency (10%)				\$5,286
Total Estimated Cost				\$58,147

Notes/Assumptions:

¹ Abatement and demolition contractor mobilization includes travel to and from site, lodging, site preparation, project permitting and bonding, site security, traffic control, dust control, Project-Specific Health and Safety Plan preparation, and incidentals (e.g., equipment, tools, plastic sheeting, fuel, etc.) to complete the Project.

² Per unit cost includes disposal of asbestos containing materials at the Billings Landfill.

³ Universal waste includes all fluorescent light fixture ballasts which are assumed to contain PCBs and all fluorescent light tubes.

⁴ Cost includes sourcing clean material, hauling material to site, and placement. Project does not need compaction specs.

Cost for oversight firm, including bid specifications, air clearance sampling, project oversight, and project reporting is not included in this estimate.

City Council Work Session

Date: 12/01/2025
Title: Follow-up on Aggressive Traffic and Excessive Noise Initiative
Presented by: Rich St. John, Police Chief
Department: Police
Presentation: No
Legal Review: Yes
Project Number: N/A

RECOMMENDATION

Purpose

Provide a concise update on enforcement and planning efforts to address aggressive driving, illegal racing, and excessive vehicular noise.

Key Enforcement Strategies

- **Interagency Collaboration:** Partner with Montana Highway Patrol (SET) and Yellowstone County Sheriff's Office for saturation patrols in high-risk corridors.
- **Technology & Data Collection:** Deploy speed trailers, road tubes, and explore camera modules to measure speed/noise.
- **Ordinance Amendment:** Draft revisions to BMCC noise ordinance (modeled on Cheyenne, WY).
- **Felony Eluding Enforcement:** Effective October 2025, fleeing an officer during a stop is a felony.
- **Public Awareness Campaign:** Launch media outreach with PW, PD, PIO, CPAB, and citizen partners.
- **Traffic Checkpoints:** Research on the legality and feasibility of periodic checkpoints.
- **Vehicle Impoundment:** Consider impoundment for chronic offenders (DUI, no insurance).

Challenges

- **Pursuit Risks:** High-speed evasions endanger the public and officers.
- **Group Dynamics:** Car meets complicate enforcement.
- **Resource Allocation:** Competing priorities (violent crime, drugs).
- **Technology Costs/Limitations:** O&M, subscriptions, legal hurdles.
- **Evidence Issues:** Driver identification challenges (helmets, no plates).

Public Works Considerations

- Determining effective designs
 - Tree placement impacts (King Ave West preferable to Shiloh).
- Property owner buy-in required.

Next Steps

- Confirm goals for initiative
- Continue PD/PW coordination meetings.
- Collect baseline statistics in target corridors.
- Draft ordinance amendment for Council review.
- Provide ongoing progress updates.

BACKGROUND (Consistency with Adopted Plans and Policies, if applicable)

Utilize information for further discussion and future actions related to CM initiative on aggressive driving and excessive noise. City staff has collected speed, volume and noise data for several corridors and will present the data to City Council for use in discussing strategies to address the concerns.

STAKEHOLDERS

Police Department, law enforcement partners, Public Works, and partners.

ALTERNATIVES

City Council may:

- Approve; or,
- Not Approve

FISCAL EFFECTS

None at this time. For future discussion.

SUMMARY

Information presented is for further council discussion and direction on aggressive driving initiative.

Attachments

Noise Ordinance
PD Traffic Survey
Public Works Speed Data
Noise Data

Division 4 – Noise Regulation of Motor Vehicles

Sec. 24-351 Legislative findings and intent

A. The City Council finds that excessive and unnecessary noise within the community endangers the health, safety, welfare, and peace of residents and visitors, and interferes with the quiet enjoyment of property, public rest, and business activity.

B. The City Council further finds that certain vehicle operations, equipment modifications, and patterns of driving produce noise that is avoidable, unreasonable, or disruptive to the public peace, particularly in residential areas and during nighttime hours.

C. The City Council recognizes that motor-vehicle noise is already subject to state regulation under Title 61, Chapter 9, Parts 4 and 5, Montana Code Annotated, and that this chapter is intended to supplement and not conflict with those provisions by providing local standards for the prevention of unnecessary or unreasonable noise within City limits.

D. This chapter is intended to:

1. Establish time, place, and manner restrictions that are content-neutral and reasonable under the First Amendment to the United States Constitution and Article II, Section 7 of the Montana Constitution;
2. Provide clear notice to vehicle operators regarding conduct that may disturb the peace or create a public nuisance; and
3. Enable effective enforcement consistent with the City's police powers granted under § 7-1-4123, MCA.

E. It is the policy of the City that the generation of noise in a manner that unreasonably disturbs the public peace is a matter of local concern, and that this chapter be liberally construed to effectuate its remedial and protective purposes.

Sec. 24-352 Purpose and intent

The purpose of this chapter is to promote the public peace, health, and welfare of the residents, public, and businesses in the City of Billings by preventing excessive and unnecessary noise from motor vehicles, while recognizing that certain noise is unavoidable.

This chapter is intended to be consistent with state law, including §§ 61-9-403, 61-9-418, and 61-9-435, Montana Code Annotated (MCA).

Sec. 24-353 Authority

This chapter is adopted under the authority granted to municipalities by § 7-1-4123, MCA, and other applicable provisions of Montana law, including § 61-12-101, MCA.

Sec. 24-354 Definitions

A. *Motor vehicle*. Means a vehicle propelled by its own power and designed primarily to transport persons or property upon the highways of Billings. The term includes any moped, power driven bicycle, motorcycle, motor scooter, automobile, truck or other vehicle propelled by a motor of any kind. It does not include a bicycle that does not have a motor.

B. *Plainly audible*. Means any sound that can be clearly heard, including bass reverberation, by a person of ordinary hearing without the use of a sound-level meter.

C. *Unreasonable noise*. Means any sound produced by a motor vehicle that:

1. Is plainly audible at a distance of seventy-five (75) feet or more from the vehicle between the hours of 10:00 p.m. and 7:00 a.m. in a residential district; or
2. Would disturb, or tend to disturb, the peace and quiet of a person of ordinary sensibilities under the circumstances then existing, considering the factors set forth in Sec. 24-356.

Sec. 24-355 Unreasonable vehicle noise prohibited

A. It is unlawful for any person to operate, or cause to be operated, a motor vehicle that produces unreasonable noise as defined in this chapter.

B. It is unlawful to operate a motor vehicle:

1. With a muffler, exhaust, or noise-suppression device that violates §§ 61-9-403, 61-9-418, or 61-9-435, MCA; or
2. With any device, modification, or equipment designed or used to increase noise output beyond the vehicle's original manufacturer specifications, except as permitted by state law.

Sec. 24-356 Determining factors

In determining whether a vehicle is operated in a manner that produces unreasonable noise, the enforcing officer may consider, among other relevant circumstances:

A. The time of day the vehicle is operated;

B. The location of operation, including zoning classification and proximity to dwellings, schools, hospitals, or places of assembly;

C. The presence of pedestrians, bystanders, or other vehicles in the vicinity;

D. The manner of operation, including unnecessary or rapid acceleration or deceleration, abrupt steering or turning, racing, revving the engine, or tire squealing;

E. The condition or modification of equipment, including operation with a missing, defective, or modified exhaust or muffler, or any other equipment alteration that increases noise output; and

F. Any other relevant factor that would lead a reasonable person to conclude that the noise was excessive or unnecessary under the circumstances.

Sec. 24-357 Exemptions

This chapter shall not apply to:

A. Authorized emergency vehicles operating with emergency equipment;

B. A system being operated on a vehicle of a gas, electric, communications or water utility company or governmental entity;

C. Vehicles participating in parades, authorized events, or public functions permitted by the City;

D. A system permitted by the Billings City Council or the Billings Police Department; or

E. Construction, maintenance, or agricultural equipment operating within lawful hours and in compliance with applicable law.

Sec. 24-358 Enforcement and penalty

A. An officer may issue a citation based on personal observation or other admissible evidence that the vehicle produced unreasonable noise.

B. Violations of this article are designated as municipal infractions, and punishable by civil penalties as specified in Section 18-1304.

Sec. 24-359 Severability

If any provision of this chapter is held invalid by a court of competent jurisdiction, such invalidity shall not affect the remaining provisions, which shall remain in full force and effect.

Executive Summary – PD Speed Trailer Survey

Location: 2000 St. Andrews Dr., Billings, MT 59105

Survey Period: August 28, 2025 – September 16, 2025

Posted Speed Limit: 25 mph

Total Vehicles Recorded: 36,477

Key Findings

- 1. Widespread Speeding**
 - **90%** of all vehicles (32,846) exceeded the posted 25-mph speed limit.
 - Only **9.95%** of drivers were compliant.
- 2. Excessive Speeding**
 - Using an excessive-speed threshold of **35 mph**, **9.76%** of all vehicles (3,561) were recorded at or above this level.
 - Some extreme speeds were documented, including a **maximum of 92 mph**.¹
- 3. Overall Speed Profile**
 - **Average speed:** 29.8 mph (≈5 mph over the limit)
 - **85th-percentile speed:** 34 mph — significantly above the statutory limit, indicating most drivers travel well over 25 mph.
 - **Standard deviation:** 4–5 mph, showing a tight cluster above the limit and a consistent speeding pattern.
- 4. Directional Consistency**
 - Traffic moving both **toward** and **away** from the recorder showed nearly identical speeding behavior, confirming this is a location-wide issue rather than direction-specific.

Public Safety Implications

- The extremely high rate of non-compliance suggests that the existing 25-mph limit is **not being respected** and likely not being effectively enforced.
- The presence of speeds in the **70–90+ mph range** represents a severe hazard for residents, pedestrians, and other road users.²
- The speed environment significantly exceeds what is considered appropriate for neighborhood or collector-type roadways.

Recommended Considerations for City Council

- 1. Targeted Enforcement:**

Initiate short-term, high-visibility enforcement to immediately reduce extreme speeds.
- 2. Traffic-Calming Measures:**

Evaluate engineering interventions such as speed feedback signs, road narrowing, curb extensions, or speed humps.

¹ Radar anomaly. Unsubstantiated.

² See footnote 1.

3. **Speed Limit Review:**

If the roadway design is inconsistent with a 25-mph limit, consider engineering assessment to determine if physical changes are necessary to support the intended speed environment.

4. **Community Engagement:**

Notify residents of findings and planned mitigation actions; consider neighborhood traffic-safety partnership programs.

Executive Summary – PD Speed Trailer Survey

Location: Rolling Hills Dr.

Survey Period: August 7–28, 2025

Posted Speed Limit: 25 mph

Total Vehicles Recorded: 34,290

Key Findings

1. **Moderate but Significant Speeding**

- **61.42%** of all vehicles (21,061) exceeded the 25-mph speed limit.
- **38.58%** of drivers followed the posted speed, which is notably higher compliance than other residential-area surveys but still represents a majority speeding.

2. **Low Rate of Excessive Speeding**

- Using a 35-mph threshold, **1.06%** of drivers (363 vehicles) were recorded at or above excessive-speed levels.
- Although low in percentage, these speeds represent an elevated safety risk where pedestrian activity may be present.

3. **Overall Speed Characteristics**

- **Average speed:** 26.24 mph — slightly above the limit.
- **85th-percentile speed:** 29 mph — indicates that most drivers exceed the posted limit but not dramatically.
- **Maximum recorded speed:** 62 mph — isolated but concerning outlier.

4. **Direction Comparison**

- Speeding behavior is consistent in both directions, indicating a corridor-wide pattern rather than a directional anomaly.
- Slightly better compliance was observed in the “Away” direction (41.45% compliant vs. 35.99% in the “Closing” direction).

Public Safety Implications

- The corridor shows a **majority speeding**, though at levels only mildly above the posted limit for most drivers.
- Excessive speeding is **uncommon**, but the presence of speeds more than twice the posted limit poses intermittent but serious safety hazards.
- Rolling Hills Dr. may benefit from targeted mitigation to narrow speed variance and reduce mid-range speeding.

Recommended Considerations for City Council

1. **Targeted Enforcement:**
Use periodic enforcement to reduce habitual speeding and reinforce posted limits.
2. **Engineering Adjustments:**
Consider speed feedback signs, pavement markings, or other low-cost calming measures to bring the 85th-percentile speed closer to 25 mph.
3. **Monitoring and Follow-Up:**
A follow-up study after mitigation can help determine effectiveness and whether additional measures are warranted.
4. **Community Outreach:**
Inform residents of findings and encourage neighborhood participation in traffic-safety initiatives.

Executive Summary – PD Speed Trailer Survey

Location: Shiloh Rd & Monad Rd

Survey Period: July 15–17, 2025

Posted Speed Limit: 45 mph

Total Vehicles Recorded: 24,292

Key Findings

1. **Majority Compliance with Posted Speed Limit**
 - **61.56%** of drivers (14,954 vehicles) traveled at or below the posted 45-mph limit.
 - **38.44%** (9,338 vehicles) exceeded the speed limit—significant but notably lower than speeding rates observed in many residential-speed surveys.
2. **Excessive Speeds Present but Infrequent**
 - With an excessive-speed threshold of **55 mph**, **2.25%** of drivers (546 vehicles) were recorded at or above this level.
 - While a small percentage, these higher-risk speeds can contribute to severe crashes on a high-volume arterial.
3. **Speed Characteristics on the Corridor**
 - **Average speed:** 44.11 mph — slightly below the limit.
 - **85th-percentile speed:** 49 mph — consistent with typical behavior on a four-lane arterial roadway.
 - **Maximum observed speed:** 97 mph — a major outlier and a substantial safety concern.
4. **Directional Differences**
 - Southbound (“Away”) traffic showed **higher speeding rates** (44.09%) than northbound (“Closing”) traffic (33.28%).
 - Higher excessive-speed frequency southbound suggests potential roadway geometry, traffic flow, or sight-line factors contributing to faster speeds.

Public Safety Implications

- Overall compliance is **relatively strong** for an arterial roadway, but nearly **9,400 speeders in a 48-hour period** still represents a substantial enforcement and safety consideration.
- Excessive speeds, though infrequent, pose disproportionate crash-severity risks.
- The corridor's high volume (24k+ in two days) amplifies the impact of even small percentages of unsafe drivers.

Recommended Considerations for City Council

1. **Targeted Enforcement on Southbound Approach:**
Deploy intermittent speed enforcement in the southbound direction where speeding is most prevalent.
2. **Speed Feedback or Dynamic Messaging Signs:**
These are effective in reminding drivers of the 45-mph limit and reducing high-end speed outliers.
3. **Review of Roadway Design Elements:**
Evaluate whether lane width, median design, or downhill grades contribute to speed increases, particularly in the southbound segment.
4. **Crash Data Integration:**
Compare speed data with recent crash history to prioritize enforcement or engineering responses.

Shiloh Rd btwn Ave D & Parkhill Dr			Speed Limit: 45 MPH
Date	85th Percentile (MPH)	Vehicles Exceeding XX MPH (% of vehicles during study)	Vehicle Volume (Average Weekday)
Oct 2025	NB=51 SB=47	45MPH - NB=35,476 (59%) SB=17,789 (30%) 50MPH - NB=14,141 (24%) SB=3,505 (6%) 55MPH - NB=3,946 (7%) SB=672 (1%) 65MPH - NB=572 (1%) SB=77 (0.1%)	NB=9,517 SB=11,170
King Ave W btwn S 32nd & Fallow Ln			Speed Limit: 45 MPH
Date	85th Percentile (MPH)	Vehicles Exceeding XX MPH (% of vehicles during study)	Vehicle Volume (Average Weekday)
Aug 2019	EB=48 WB=47	45MPH - EB=6,823 (36%) WB=4,648 (27%) 50MPH - EB=1,432 (8%) WB=764 (4%) 55MPH - EB=244 (1%) WB=172 (1%) 65MPH - EB=13 (0.1%) WB=25 (0.1%)	EB=9,874 WB=9,059
Oct 2025	EB=47 WB=47	45MPH - EB=16,547 (26%) WB=14,123 (24%) 50MPH - EB=3,116 (5%) WB=3,074 (5%) 55MPH - EB=672 (1%) WB=780 (1%) 65MPH - EB=83 (0.1%) WB=163 (0.3%)	EB=9,641 WB=8,873
Gleneages Blvd btwn Claremont Rd & Oakmont Rd			Speed Limit: 35 MPH
Date	85th Percentile (MPH)	Vehicles Exceeding XX MPH (% of vehicles during study)	Vehicle Volume (Average Weekday)
Apr 2017	NB=36 SB=40	35MPH - NB=388 (20%) SB=846 (42%) 40MPH - NB=65 (3.4%) SB=280 (14%) 45MPH - NB=16 (0.8%) SB=48 (2%)	NB=510 SB=527
Aug 2017	NB=37 SB=36	35MPH - NB=1,527 (30%) SB=812 (17%) 40MPH - NB=302 (6%) SB=142 (3%) 45MPH - NB=75 (1%) SB=34 (0.7%)	NB=836 SB=805
Jun 2022	NB=36 SB=38	35MPH - NB=1,177 (25%) SB=1,432 (33%) 40MPH - NB=76 (2%) SB=204 (5%) 45MPH - NB=8 (0.2%) SB=19 (0.4%)	NB=1,307 SB=1,201
Oct 2025	NB=36 SB=38	35MPH - NB=3,227 (24%) SB=4,788 (39%) 40MPH - NB=325 (2%) SB=931 (8%) 45MPH - NB=48 (0.4%) SB=148 (1.2%)	NB=2,177 SB=2,757

