

Response to Comments

The comment period on the Draft EA started February 27, 2018. DEQ received several requests for extending the comment period. On March 12, DEQ extended the comment period to March 20, 2018.

During the comment period, DEQ received approximately 300 comments from about three dozen commenters on the Draft EA. DEQ read and considered each comment. Because large numbers of comments addressed similar topics or themes, DEQ developed general-themed responses to address many of those related comments in one place.

DEQ grouped comments by major topic and provided general responses to those topics. This part of the document presents these responses. DEQ made changes to the Final EA in response to some of the comments we received. This is reflected in the responses and the Final EA is amended.

General Comments

Comment: A number of commenters voiced their opposition to the project and asked the Department to deny the subdivision application, stating, for example, that the Department should “vote no,” “reject this proposal,” “deny their request,” and “do its best to restrict this project.”

Response: The Department notes these comments. However, MEPA is a procedural statute that creates a process to disclose and evaluate the environmental impacts of a proposed state action. MEPA does not create any independent authority for the Department to deny an application, and the Department’s regulatory authority is limited by ARM 17.36.110, which requires the Department to approve subdivision applications if the application has satisfied the requirements of that rule.

Comment: One commenter stated that “[t]he areas adjacent to one of our greatest national treasures should be preserved in a natural state as much as possible, whether through zoning laws or other conservation policy.”

Response: DEQ notes this comment, but planning and zoning laws are enacted at the local county level and are not regulated or promulgated by state law or regulation.

Comment: A number of commenters asked general questions about the proposed subdivision. These questions included, for example, questions about whether outdoor cooking or open fires would be allowed, whether oil or gas spillage was a concern, and whether herbicides would be allowed in the proposed subdivision. General questions also included statements that GPI could eliminate the need for employee housing by offering local residents a sustainable wage, that the proposed use of cabins as employee housing requires a new review by the county commissioners, that GPI needs to consider a land swap for a location north of the park and keep the open space intact, that construction of a viaduct across the BNSF Railroad could be a solution to the River

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Bend Drive overloading. One commenter stated that the RV park should be classified as commercial, not residential. One commenter stated that increased human concentration would further limit resident's access to internet connectivity and cell phone service. One commenter stated GPI needs to consider a land swap for a location north of the park and keep the open space here intact.

Response: The Department notes these comments, but they are not addressed in our analysis because these are all issues associated with local permitting or private business decisions and not with DEQ's narrow permitting action, and subsequent analysis of the water, wastewater, storm water, and solid waste facilities.

Comment: Some comments asked if the facilities could be used year-round and whether there would be a Phase 3.

Response: The proposed facilities are proposed to be operated only from May through September. The facilities could be used in the winter, as discussed in the responses on pages 13 through 14. DEQ has not received a submittal for a Phase 3, or expansion of the project. If we do, it will be reviewed and analyzed under MEPA and DEQ rules.

Comment: Several commenters stated that the proximity of the proposed project to Glacier National Park would produce increased human use of the West Glacier area, thus placing additional stress on the natural environment. One commenter stated that the proposed project would use and stress the resources in the community of West Glacier but would not bring any significant employment opportunities to the area.

Response: As discussed throughout the Draft and Final EA and these responses, DEQ does not anticipate that the proposed facilities under review would have a negative impact on Glacier National Park or the West Glacier Area. Whether the proposed subdivision itself would bring traffic and additional stress to the area is outside the scope of DEQ's MEPA review. For a further discussion, please see page 3 of the Final EA. Commenters should be aware that the Flathead County Board of Commissioners evaluated the proposed subdivision and concluded that adverse impacts related to recreation were not anticipated.

Comment: One commenter stated that the Draft EA was premature because, according to the commenter, the application for Phase 2 was incomplete at the time that DEQ prepared the Draft EA.

Response: Phases 1 and 2 propose to use the same water, wastewater, and storm water facilities, making it appropriate to evaluate both phases in a single EA. DEQ evaluated both phases of the proposed subdivision in the Draft EA because both applications had been submitted to DEQ and were sufficient to conduct DEQ's MEPA analysis. Although DEQ did issue a denial letter for Phase 2 shortly after the Draft EA was issued, that denial letter concerned only technical issues that did not affect any of the analysis of the Draft EA.

Comment: A number of commenters stated that DEQ should have provided a longer comment period. Some asked about DEQ statutory time lines for subdivision review.

Response: An Environmental Assessment under MEPA does not require that a public comment period be provided or that any period be a specific length of time. Instead, the level of public involvement must be based on the complexity and seriousness of environmental issues associated with the proposed action and the level of public interest in the action.

In this case, DEQ determined that the potential for adverse environmental impacts associated with the proposed action was minimal, the basis of which is discussed throughout the EA. DEQ was aware of local interest in the project and concluded that a public comment period was an appropriate form of public involvement. DEQ determined that a two-week period was appropriate for the nature of the proposed action. DEQ received a number of requests for a longer period, so DEQ provided an additional week for public comment. A number of requests asked for up to six to eight weeks, but DEQ determined that such a long comment period was not appropriate in light of the factors discussed above.

As for the comments regarding DEQ's statutory time restrictions, DEQ is statutorily required, as relevant here, to make a final decision on subdivision applications within 40 days after we receive a complete application and within 30 days of subdivision resubmittals. The Sanitation in Subdivisions Act does allow brief extensions for DEQ to complete its review, which DEQ did use in this case. The Act provides an extended time period for DEQ to complete an Environmental Impact Statement but does not provide extra time to complete an Environmental Assessment.

Comment: One commenter stated that making specific and relevant comments would be much easier if a detailed copy of the proposed development including associated maps was available online.

Response: DEQ concluded that the project was adequately described in the Draft EA, and all plans and maps were available for public viewing in DEQ's Kalispell office.

Comment: Commenters stated that the Draft EA did not address the alternative of connecting the proposed subdivision to the National Park Service wastewater treatment facility. DEQ also received comments concerned about impacts to the Wild and Scenic River.

Response: DEQ looked at this alternative but eliminated it from consideration. First, connecting to the NPS facility would create environmental impacts not present with the proposed facilities. The proposed facilities are set back from the river and eliminate groundwater discharges through the use of the spray irrigation area. Connecting to the NPS facility would require tunneling and transporting sewage under the river. Second, as noted in section 24 of the Draft and Final EA, DEQ eliminated from consideration alternatives that would involve the construction of facilities

not proposed by the applicant because such alternatives would be outside the needs and goals of the applicant and because MEPA does not require the consideration of alternative facilities or alternatives to the proposed project itself.

Traffic Congestion

Comment: A number of commenters expressed concerns about traffic related to the West Glacier RV Park. These included concerns about increases in the day-to-day traffic in West Glacier, on River Bend Drive and the Going to the Sun Road, and outside Glacier National Park; concerns that the increased traffic would impair emergency evacuations (including situations like wildfire and train derailments) and access by emergency responders; and concerns that increased traffic would cause air, light, and sound pollution. Some commenters asked for the completion of a traffic survey and the creation of an alternative or additional access points.

Response: DEQ notes these comments, but DEQ has no regulatory authority over traffic or the local review of subdivisions. Instead, DEQ’s regulatory authority for subdivisions is limited solely to a review of the water, wastewater, storm water, and solid waste facilities. Although the development of the subdivision may cause impacts from traffic, this issue is beyond the scope of the Department’s regulatory authority and thus outside the scope of the Department’s MEPA review.

Commenters should be aware that this issue was considered by the Flathead County Board of Commissioners, which found that traffic impacts from the subdivision were anticipated “but appear[ed] to be acceptable because based on the information provided to the planning office there will be an acceptable Level of Service, the RV park is accessed by a paved public road, approach permits for the primary and emergency secondary access will be required from Flathead County Road and Bridge Department, and the internal road network would be constructed to applicable standards outlined in 4.5.7 of FCSR.”

Comment: One commenter stated that the Draft EA failed to analyze the impacts from the construction and operation of the wastewater system “on the already saturated local roadways.” The commenter stated that additional traffic in the West Glacier area is a significant public concern and that the Draft EA failed to analyze the impacts of the construct and operation of the proposed systems on governmental services, including transportation.

Response: The construction of the proposed systems would have some impact on the local roadways and local services, but DEQ does not expect that any impact would be significant. Traffic generated by the construction of the proposed systems would be limited in severity, duration, and frequency, since the impact would cease as soon as construction was completed. Likewise, traffic generated by the construction of the proposed systems would be significantly less than the traffic generated by the subdivision as a whole, which the Flathead County Board of

County Commissioners found to be acceptable for the reasons listed in the response to comment above. Traffic generated by the operation of the systems would be negligible because the systems would be operated by a single operator. Section 16 of the Final EA has been amended to include this analysis.

Wildlife

Comment: A number of commenters stated that the proposed subdivision would interrupt a major wildlife corridor or would destroy wildlife habitat.

Response: The National Heritage Program identifies abundant wildlife in the area. The Final EA has been updated to include this resource.

DEQ does not anticipate significant adverse impacts to wildlife. Because no water discharges to ground or surface water are proposed as a part of this proposal, impacts to water quality and fish species are not expected to be impacted. Construction of the proposed facilities could cause temporary disturbance to bird nesting or bird and wildlife habitat in the immediate vicinity of the project site, but no long-term adverse effects on biological resources in the area are anticipated. Once completed, the facilities would consist of the lagoons, wastewater pumping stations, spray irrigation area, a water storage tank, and a water pump house, all of which would take up approximately 13.6 acres. More than 120 acres owned by GPI would not be disturbed by the project, leaving ample habitat in the surrounding vicinity.

Space on the site would allow wildlife to travel through the property outside the fenced wastewater lagoons and spray irrigation area. Specifically, GPI-owned property provides a minimum width of 350 feet undeveloped on the west side of the fenced area and 200 feet undeveloped on the east side of the fenced area, which would allow wildlife to travel. At the request of FWP, the applicant also incorporated connecting some of the green area on the west side of the irrigation fields and the wetlands with open space corridor.

As noted throughout the Final EA and these responses to comments, the potential impacts from the proposed subdivision itself are outside the scope of DEQ’s MEPA analysis. Nevertheless, impacts to wildlife from the proposed subdivision were considered as part of the county review of the proposed subdivision. In doing so, the county found that impacts to wildlife would be minimal: “Minimal impacts to wildlife habitat as a result of the proposed RV park are anticipated because the subject property contains no particular sensitive habitat, surface waters, wetlands, or riparian areas, and site development would aim to maintain connected open space.” The Final EA has been updated to reflect this analysis.

Comment: A number of commenters stated that bears would be attracted to the odor of the sewage lagoons.

Response: In general, bears may be attracted to sewage in some instances. However, DEQ is involved with lagoon permitting and technical assistance throughout bear country in Montana and is not aware of bear attraction being a pervasive problem. Glacier National Park maintains a sewage lagoon in the immediate vicinity of the proposed facility, and personnel with GNP informed DEQ that they do not have a problem with bear attraction on the west side of the park. They also informed DEQ that the west-side lagoon is protected only with a chain-link fence. Personnel with Montana FWP indicated to DEQ that FWP does not have a written standard regarding bears and sewage lagoons, but that Yellowstone National Park uses chain-link fences with barbed wire. In response to this information, the applicant decided to supplement the proposed chain-link fence with barbed wire. The Final EA has been modified to include this information.

Comment: One commenter stated that not all sensitive or species of concern wildlife were identified in the Draft EA.

Response: The Final EA has been updated to include the species in the National Heritage Program report.

Comment: Some commenters asked questions regarding wildlife. These questions asked what would happen if wildlife problems occurred in the future, how wildlife problems would be handled and who would handle them, whether reporting wildlife encounters would be mandatory, and how many bears are shot each year after getting into areas habituated by humans.

Response: DEQ notes these comments. For the reasons stated in the EA and these responses, DEQ does not anticipate significant adverse impacts to wildlife from the proposed facilities subject to DEQ review. DEQ does not regulate wildlife or control or how wildlife problems would be handled.

Plants/Weeds

Comments: One commenter stated that no plan was presented should any species of special concern be encountered during construction.

Response: The plant species on site were evaluated as a part of the Flathead County Platting process, which concluded that plant species of concern are located north of the project site, and the plant species on-site would not have changed during this short time period. The Final EA has been updated to include these species.

Comment: One commenter asked what plant species would be used to landscape the storm water swales and noted that the West Glacier community can sustain further development only if CALURS guidelines are followed.

Response: The storm water “Bio Retention Areas” plantings will be selected by the owner (GPI) and the landscape contractor. A Condition of Plat approval by Flathead County Board of

Commissioners and Findings of Fact indicate that landscaping will be utilized to provide sufficient screening of the development from adjacent properties and roadways in accordance with the 4.1(F)(11) CALURS criteria.

Comment: One commenter was concerned for weed species to displace native vegetative species ... Implementation of a Weed Control Plan, states that weeds will be hand-picked or sprayed as required. What herbicides will be used? No restricted use pesticides can be used, and specific precautions should be listed regarding avoidance of risks to people, ground water, wildlife, and drift to adjacent sites.

Response: The owner (GPI) has completed a Weed Control Plan for the facility. This plan requires that any noxious weeds on site be managed by revegetation of disturbed areas and by treating the noxious weeds with herbicides. Per the approved Weed Control Plan, herbicides approved for controlling noxious weeds are Milestone, Diacamba, 2-4-D (Weedmaster) and Tordon 22K. Flathead County Weed Department would perform periodic inspections of the site during revegetation stages and on-going operation.

Comment: One commenters raised concerns about minimizing impacts to vegetation during construction.

Response: The Montana Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction Activity would apply to this site, which proposes to disturb more than 1 acre during construction. The proposed construction documents require the eventual construction contractor to obtain this construction activity storm water permit. The permit requires the site to achieve final stabilization prior to terminating coverage by the permit. As such, the site must maintain the mitigation components identified in the Storm Water Pollution Prevention Plan (SWPPP) until final stabilization is achieved. Final stabilization requires the site to establish vegetative cover with a density of 70% of the pre-disturbance level. Final stabilization using vegetation must be accomplished using seeding mixtures of forbs, grasses, and shrubs that are adapted to the conditions of the site.

Noise and Light Pollution

Comment: A number of commenters stated that the proposed subdivision would cause noise and light pollution. Commenters stated that noise would be generated by the construction of the subdivision and by the types of daytime activities associated with tourist campgrounds. Some commenters noted that any lighting of the proposed wastewater facilities would have to comply with the Dark Skies requirements.

Response: Construction of the proposed facilities would cause some short-term noise, but no significant noise is expected from the operation of the facilities. A number of commenters stated that the sewage lagoons would have flood lights, but no lighting has been proposed for the facilities under review by DEQ. Commenters should also be aware that GPI's major land use permit, issued

by the county, requires the proposed subdivision to use dark-sky lighting and requires quiet hours from 10 p.m. to 8 a.m. The Final EA has been amended to include this information.

Comment: Some commenters asked about the “narrow listing” of sources consulted in preparing the Draft EA. Some commenters stated that the Draft EA lacked objective research and data analysis and contained no reference to scientific studies or other authorities. Some commenters stated that the Draft EA was without scientific credibility.

Response: DEQ’s Draft EA sites multiple persons, agencies, and documents consulted in the preparation of this analysis (see EA section 29). We’ve also added several sources including the Natural Heritage Program Database search and communications with personnel with Glacier National Park and Montana Fish, Wildlife & Parks.

Socio-economic

Comment: A number of commenters stated that the proposed development would severely impact the cultural uniqueness of West Glacier. Some of these comments were not substantive, but others stated that West Glacier’s charm and unique features were because of its small size, limited facilities, and local families; that West Glacier was not a 24/7 resort town; that the proposed subdivision would destroy the unique community and transform it into just another corporate-owned property; that the proposed subdivision would increase homelessness, transiency, theft, and other crimes; that an increase in tourist activity would damage the reason people visited the area; that the proposed subdivision would increase noise and congestion that would distract from the visitor experience; that the proposed subdivision would cause the community to change because of human/wildlife encounters and changes in air and water quality; that the proposed subdivision would forever change the beauty and character of the area; and that “GPI is literally damaging habitat and putting a parking lot to park RVs for folks to enjoy the outdoors.” One commenter stated that local residents would be directly impacted by the proposed subdivision and “shouldn’t have to risk our most valuable assets in our local community for the convenience of a summer transient population and to profit an out of town company.” One commenter stated that, although the actual proposed system would not have an effect on schools or police government services, the cabins and RV sites would result in direct and secondary impacts to police government services. Some commenters stated that the increase in residents and transient campers would require additional law enforcement and fire protection and asked whether the county was capable of providing increased protection. One commenter stated that the proposed subdivision would “only add further congestion to an already overburdened area that does not have the infrastructure to support additional population levels,” and another commenter stated that the West Glacier community “is not equipped to resolve the problems that will be generated by this development: increased water use, sewage treatment lagoons and spray field in the midst of the community, increased traffic, and law enforcement (who will be responsible for law enforcement in the development?).” Another comment stated that schools could be impacted by being required to serve homeless students and noted that there was not an apparent coordination of services between

county, state, and federal agencies. Another commenter stated that the existing community is currently unable to provide sufficient basic services (such as restaurants, fuel, and food), and the proposed subdivision would exacerbate the existing situation. A number of comments stated that GPI was an out-of-state corporation that was following a corporate model that was not specific to the unique setting of West Glacier.

Response: Many of these comments are outside the scope of DEQ’s MEPA analysis, which is confined to those impacts caused by the facilities that DEQ reviews—that is, the water, wastewater, storm water, and solid waste facilities. Comments related to a change in the West Glacier community caused by the subdivision itself—such as comments regarding traffic, education, police services, etc.—are outside the scope of DEQ’s MEPA review. For a further discussion of the scope of DEQ’s review, please see page 3 of the Final EA. Many of these comments are also addressed in DEQ’s responses to comments regarding traffic, odor, and wildlife.

As for the proposed facilities under review, DEQ does not anticipate any significant adverse impacts to the cultural uniqueness of West Glacier. The proposed facilities would be constructed adjacent to the commercial developed area of West Glacier, leaving undisturbed approximately 120 acres owned by the applicant. As discussed in section 9 of the Final EA, the lagoons would be screened from view by trees, by their elevation, and by their location away from existing residences and businesses. Additionally, as discussed in section 21, the proposed facilities are not out-of-character with the tourist-based area, which includes in the immediate vicinity a golf course, commercial development, the existing sewage lagoon that serves the national park, and the large Apgar Campground.

Comment: Several comments raised concerns about potential of devaluing surrounding property because of noise, odors, and traffic.

Response: DEQ does not anticipate that the proposed facilities would cause effects that would impact property values, for the same reasons that DEQ does not anticipate that the proposed facilities would cause significant adverse impacts, as discussed throughout the Final EA and these responses.

Comment: Although this project will use and stress the resources in the community of West Glacier, it will not bring any significant employment opportunities to the area (1 full time employee).

Response: The one employee is specific to the operation of the wastewater facility. Several temporary construction jobs will be created to build the water, wastewater and storm water infrastructure. Flathead County evaluated employment impacts for the entirety of the project during the Platting process of the RV Park.

Comment: The community of West Glacier is very small. I'm having hard time with the idea of open sewage ponds and sewage irrigation. The last summer is very windy in the canyon and it looks like there is the possibility of GPI pumping sewage and the smell into the air. I can't think of another town anywhere that has open sewage in the town. For the sake of another successful 100 years of Glacier please put an end to the septic ponds and help preserve a community that has been the highlight of millions of vacations.

Response: Many communities in Montana are served by facultative or aerated lagoons. The proposed facilities are not located in West Glacier but on adjacent privately owned parcels. Sewage lagoons are an allowed type of wastewater facility, and the proposed facilities would meet all DEQ rules and design standards, including setback requirements. Please also see section 9 of the Final EA, which discusses odor and aesthetics.

Water/Wastewater/Storm Water/Solid Waste

Comment: A number of commenters stated that the proposed plans discussed in the Draft EA did not adequately account for the amount of water that would be used by the project. Commenters stated, for example, that the proposed project would be commercial, rather than residential; that employee housing would require more water resources, and that the proposed system would use 70 gpm instead of an earlier proposal of 35 gpm. Some commenters stated that the water quantity analysis was deficient because the water-well draw-down tests were conducted on each well separately on different days, which, according to the commenters, does not represent simultaneous and continuous use of both wells over long periods of time. Some commenters expressed concern about whether the proposed water system would affect other wells in the area.

Response: The proposed water system consists of two wells that would operate in a lead/lag/alternate configuration, meaning that only one well would operate at a time. The system was designed based on only one well operating at a time, at a maximum flow rate of 35 gpm. The plans, engineering report, and control retain this configuration. The Final EA has been updated to clarify this design.

The DNRC Notice of Completion Water Rights Certificate granted for the wells allows flexibility regarding flow rate, where each manifolded well source may produce no more than 35 gpm, but the water right allows for the wells to operate simultaneously (denoted by the 70 gpm maximum flow rate granted for the water right). DNRC is less concerned with instantaneous flow diversions and more concerned with the 9.6 acre-ft volume limit for this water right. Based on the water right limits, each well will operate less than 5 hours per day to keep the storage tank full.

Water use by the proposed resort cabins would not be altered based on whether some of the cabins are occupied by vacation renters or staff. Water consumption has been based on double occupancy of each bedroom. The public water supply system serving the proposed RV and cabin village has

adequate capacity to serve all uses and has provided redundant components (including redundant wells, 157,000 gallon storage tank, and redundant booster pumps) to ensure adequate service.

The yield and drawdown testing performed on the proposed wells demonstrated that the wells would have an extremely low impact to the aquifer and that impacts to neighboring wells over a half mile away would not be measurable. The testing involved pumping the wells at 82 gpm (for 12 hours with Well #1 and 9 hours for Well #2), after which the water level dropped less than 1 foot, meeting the criteria of stabilized drawdown outlined in DEQ design standards. This demonstrates that the aquifer minimally reacts to this volume of water removal from a highly prolific aquifer and will not impact water availability for neighboring wells. Although the proposed wells would use only one 35 gpm well at a time, the wells were pump tested at 82 gpm, meaning that the wells were tested at a rate higher than having both 35 gpm wells running simultaneously.

Comment: One commenter asked how a public water supply system “using twice the allowed residential rate [could] be granted a water rights certificate.” The commenter also stated that the draft EA indicated that the water rights certificate was pending but not yet granted. One commenter stated that the proposed facilities would cause a water compact violation.

Response: The use of a DNRC Ground Water Certificate for water rights is not limited to residential use. This type of water right certificate is regularly used for commercial businesses and non-community public water supply systems across the state. Please note the most significant limitation is the total 9.6 acre-ft volume per year. The final ground water certificates have been issued by DNRC Water Resources Division with approval by the National Park Service in accordance with the Glacier National Park compact.

The final Ground Water Certificates have been issued by DNRC Water Resources Division with approval by the National Park Service, in accordance with the Glacier National Park Compact, with a priority date of January 16, 2018.

Comment: One commenter stated that the well pump test was conducted during the wettest time of the year and should have been done when water levels were at their annual lows. Other commenters stated that a more reasonable evaluation would have required both wells to be pumped for a 12-hour period.

Response: Circular DEQ-3 Design Standards, which apply to the design of this water system, do not stipulate the time of year for yield and drawdown testing of potential PWS wells. Nonetheless, the results gathered in November, after the previous year’s snowpack is no longer contributing to the upgradient drainage basin, indicate a very prolific aquifer. Additionally, both wells were pump tested at 82 gpm, which exceeds the impact of having two simultaneous 35 gpm pumps running. Lastly, the wells would not pump more than 35 gpm each at any given time. The peak demand of the cabins and RV would be satisfied by the storage volume. Additionally, the fire flow would be also be provided by the volume of water in the storage tank.

Comment: One commenter asked who would monitor and pay for aquifer monitoring for local well levels and what monitoring schedule would apply.

Response: On-going aquifer monitoring of adjacent wells is not a requirement of DEQ or DNRC Water Resources Division (WRD). DNRC WRD does require flow meter data to be submitted annually for the subject wells.

Comment: One commenter expressed concerns about system failures and stated that seasonal and short-term employees would not be invested in ensuring that such failures would not occur.

Response: The West Glacier RV Park water system meets or exceeds the Circular DEQ-3 Design Standards. Only one well is required by DEQ, but two are provided for redundancy. Only one booster pump is required, but three are provided for redundancy. Regarding long term operation, West Glacier RV is classified a Transient PWS system, like hundreds of other water systems in Montana. This classification does not require operation by a certified operator. If the PWS system failed beyond the redundancy provided, the system would be simply shut down and vacation guests would be turned away. Please note that a certified wastewater operator would be required to operate the lagoon system.

Comment: Several commenters raised questions about seismic activity and the impacts to the project.

Response: If the structural stability or impervious liner were impacted by seismic activity, DEQ would require remedy to ensure that the lagoon volume remained per design and that the leakage rate did not exceed 6 inches per year. Please also see response to comment on pages 16-17 below.

Seismic activity could also impact the structural integrity of the water storage tank and groundwater wells. In that case, reconstruction of that infrastructure would be required prior to the facility returning to service. Failure of the storage tank could release the 150,000 gallons of water contained. However, no water from this release would leave the site or threaten off site structures. The water contained in the tank would meet drinking water standards and is not chlorinated. Therefore, no water quality impacts in the vicinity would occur. Seismic activity would not impact the “Bio-Retention Areas”, since they are simply constructed of a highly permeable amended soil mix.

Comment: One comment asked whether vibration from the train would have impacts on the proposed water system.

Response: No impacts are anticipated. Water mains are constructed adjacent to railroads all over Montana in much closer proximity to the tracks than the proposed facilities, and the vibrations do not impact the pipe connections.

Comment: Several comments concerned technical questions about the design of the proposed lagoons. These questions asked how the drains for the ponds would be constructed, whether water or sludge would drain off the top of the pond, whether there would be a sludge build up in the bottom of the ponds, and how that sludge would be dealt with.

Response: For a general description of the proposed project, please see pages 1 and 2 of the Final EA. More specifically, piping would extend from the wastewater collection system within the RV and cabin spaces to a central lift station that would pump wastewater into the aerated lagoons. Wastewater would be then piped into the storage cells by gravity. The plans include three intakes in the aerated cells, placed at different elevations, which would allow effluent to be piped from different depths to the storage cells. The lowest intake would be placed 2 feet above the bottom of the cell floor. Piping from the storage cells would gravity flow into the irrigation pumping system, which would pump effluent to the irrigation pivots system. A coarse stainless-steel screen would be placed on the intakes to the irrigation pump system.

The proposed cells are designed to accommodate sludge buildup of up to 2 feet, based on DEQ design standards. In general, sludge accumulation is a slow process, and it will take decades to reach the 2-foot limit. Once that limit is reached, the sludge will have to be removed and disposed in an approved location, such as a permitted solid waste landfill.

Comment: Some commenters raised concerns about how the lagoons and spray-irrigation system would work throughout the entire year. These comments questioned how the lagoons and spray irrigation would work in freezing weather and with a limited growing season.

Response: The proposed facilities are planned to operate during the summer tourist season, from mid-May through September. Freezing conditions during this time frame are generally not anticipated, but aerated lagoons can operate in freezing conditions. The irrigation plan indicates that nearly all the effluent from the aeration cells and storage cells would be applied by the end of September. Because the ponds are setup to accommodate a 2-ft sludge layer, 2 feet of liquid/sludge layer would remain in the bottom of the ponds. The ponds would accumulate only precipitation and snow from October through April, which they have been sized to accommodate.

As for the spray-irrigation system, wastewater effluent may not be applied when the grass is dormant. The proposed facility would generally spray irrigate from late May through September, although the irrigation system would be shortened if the grass were dormant for a longer period in a given season. Further, the proposed designs provide ample storage volume to hold precipitation and effluent for months into the operating season; with this ample storage volume and in accordance with Department standards, the precipitation/effluent would not be sprayed on dormant grass. The proposed facilities would also be required to be operated in accordance with an operation and maintenance manual that was prepared by a design engineer, which covers seasonal start up and shut down procedures in the spring and fall.

The proposed grass crop was selected by a local agronomist for optimum growing in the West Glacier climate with knowledge of the short growing season.

Comment: Some commenters asked about the rain and wind sensors that would be used for the proposed spray-irrigation system, raising concerns about when the system would be turned off, who would monitor the system, and whether the system would spread pathogens.

Response: The proposed design would include several features to reduce the spread of the effluent spray and any pathogens. The spray irrigation area would be fenced with a 200-foot setback, which would buffer human impact with effluent spray mist. Beyond the 200-foot setback area, the GPI property extends over 300 feet to the nearest property to the west. The irrigation system would include only vertically oriented misters, not end spray guns.

The proposed design includes wind and rain sensors that would automatically shut down the irrigation pumps if the wind reached 25 mph or if water was detected. The wastewater facilities would be operated by a certified wastewater operator, who would operate the facilities, perform sampling and determine timing of grass cutting in accordance with the engineer-submitted operation and maintenance manual.

Comment: Some commenters questioned the use of data from the Creston AgriMet Station. One commenter stated that temperature variations have effects on aerobic biological wastewater treatment efficiency and that data from Creston, Montana, was inappropriate for sludge deflocculation in West Glacier. Others stated that the Creston evapotranspiration data was inappropriate to use for West Glacier.

Response: Two analyses are required to calculate the amount of land necessary to spray irrigate. One is a soil permeability calculation that looks at the hydraulic loading capability of the soil. The second is an analysis of the nitrogen uptake of the proposed crop that will be irrigated by the system. Of these two, the nitrogen uptake analysis almost always requires a larger area of land to spray irrigate and is therefore almost always the controlling calculation.

The plans submitted to DEQ used evapotranspiration (ET) data from the Creston AgriMet Station for only for the soil permeability calculation. However, the nitrogen uptake calculations for the proposal would require nearly twice the amount of land than the soil permeability calculation, so the proposed spray-irrigation facilities are sized based on the nitrogen uptake calculations.

Temperature does impact aerobic treatment in aerated lagoon cells, but this was accounted for in the aeration calculations in the plans submitted to DEQ. Creston data was not used in these calculations.

Comment: Some commenters stated a concern about the impact on existing natural wetlands on the property. Other commenters stated that the draft EA did not account for any bordering wetlands, stating that there are wetlands directly adjacent to the property to the northwest. One

commenter stated that there was a pond on the adjacent property and asked what impact the proposed systems would have on that pond. Some commenters stated that wastewater or storm water would contaminate or degrade the West Glacier groundwater and nearby surface waters.

Response: Carver Engineering assessed wetlands on the total property. No wetlands were identified in the areas where water, wastewater or storm water improvements are proposed to be located. The water, wastewater and storm water proposed on this parcel would not impact adjacent properties, as discussed in section 2 of the Final EA.

Comment: A number of commenters stated generalized concerns about potential odors from the proposed lagoons.

Response: Odor was addressed extensively in the Draft EA. Please see section 9 of the Final EA and the following three responses to comments.

Comment: One commenter cited EPA, *Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers*, EPA/600/R-11/088 (2011), for the proposition that the normal operation of a sewage lagoon system would result in several smells that were described as earthy, septic/sewage, grassy, fishy, or rotten egg.

Response: The EPA publication cited by the commenter covers a number of lagoon designs, not just the proposed aerated lagoons discussed in the EA. The EPA publication also states that aeration reduces the potential for unpleasant odors, consistent with the analysis in the Draft and Final EA. As for the specific odors identified by the commenter, those odors were discussed in the publication in the context of indicators for pond troubleshooting. Additionally, the proposed lagoons would be required to be operated by a certified wastewater operator, who would operate the lagoons according to the engineer-designed operation and maintenance manual.

Comment: Some commenters asked what recourse they would have if odor became an issue in the future.

Response: DEQ does not regulate odor. The proposed wastewater facilities would be operated by a certified wastewater operator, and odor concerns should be addressed to the operator or the owner of the facility.

Comment: A number of commenters stated that the Draft EA was incorrect for stating that the proposed sewage lagoons would be located at least 1/4 of a mile (1320 feet) from the nearest existing residence of business structure.

Response: The aerated lagoons and storage cells would be located so that the closest property boundary to the west would be over 1200 feet away. The closest existing residence on the adjacent western property (Rensel) would be over 1700 feet from the lagoons. In the northeast direction (toward the West Glacier village), the closest adjacent property not owned by GPI would be 1600 feet away. To the south and east, the Burlington Northern railroad and US Hwy 2 East corridors

border the subject property. On the east side of the highway, the closest property boundary to the lagoon (Lundgren) is vacant and would be over 800 feet away. The closest home would be 1400 feet away. The Department does not regulate whether homes can visually see a sewage lagoon. However, the low elevation compared to most adjacent properties and the heavy tree cover would minimize the lagoon visually. For clarity, the ¼ mile distance refers only to the lagoons, not to the spray irrigation fields. Only the 200-ft setback is required to be maintained around the spray irrigation area.

Comment: Some commenters stated that the draft EA was incorrect for stating that the prevailing wind direction is from the north or northwest and would therefore carry any odors away from the nearest neighbors. Relying on Arnold I. Finklin, *A Climatic Handbook for Glacier National Park—with Data for Waterton Lakes National Park*, General Technical Report INT-204 (July 1986), the commenters stated that the prevailing July and August winds would be from the south west.

Response: The Finklin resource presents general guidance on wind direction, indicating the prevailing wind direction in West Glacier is from the southwest. The resource also indicates that “strong gusty winds may occasionally occur on the west side of Glacier, particularly with cold airflow from the northeast, in or near canyon or pass areas aligned with flow.” The reference indicates that wind direction may be affected by obstructing terrain and valley or canyon orientation, as well as time of day. The Final EA has been modified to remove the reference to north or northwest wind direction, because the source of that estimate by the submitting engineer is not known. Overall, wind direction can vary by season and time of day, so it is not possible, nor required by DEQ Design Standards, to site the aerated lagoon cells down wind of all homes at all times.

The Draft EA cited wind direction as one reason that DEQ did not believe that odor from the lagoons would be a significant adverse impact. Although DEQ has revised the EA to omit this reason, DEQ still concludes that odor would not be a significant impact, for the reasons discussed in section 9 of the Final EA.

Comment: Some commenters stated a concern about potential leakage from the proposed sewage lagoon, both from normal operation and from possible catastrophic system failure.

Response: Please see section 2 of the Final EA for additional discussion of potential leakage.

The 60-mil HDPE liner proposed for all for cells would undergo thorough evaluation and leak testing during installation, per DEQ design standards and the technical specifications of this submittal. Further, DEQ-2 Design Standards allow a maximum of 6 inches per year of seepage from a lined lagoon over long-term operation.

Catastrophic failures, such as a failure caused by an earthquake, are extremely rare, and the potential impacts from such failure (such as nutrient discharge to the groundwater) would be

limited in duration. In the case of a catastrophic failure, the nutrient-rich wastewater would travel vertically through the unsaturated soils and then eventually enter the groundwater, traveling horizontally toward the river. Once the wastewater reached the river, it could cause temporary algae growth, but the threat to humans would be minimal. In 2012, DNRC determined that the risk to the environment from catastrophic failure was low so wastewater treatment lagoons were removed from review under the Dam Safety Act.

Comment: Some commenters asked about the height and type of fencing around the sewage lagoons. Another commenter stated that electric fences would limit access but would not prevent children or wildlife from gaining access. The commenter also asked who would be responsible for maintaining the fence and overseeing the lagoons for trespass.

Response: Department Circular DEQ-2 requires that lagoons must be enclosed with an adequate fence to prevent entering of livestock and to discourage trespassing. The applicant has proposed to use chain link fencing that is 6-feet, 3-inches high, with barbed wire above that. The West Glacier RV wastewater facility would be required to be operated by a Certified Wastewater Operator. That person would be tasked with overseeing the aerated cells, the storage cells, the spray irrigation system and the fencing. DEQ does not police trespassing, which would be handled privately or through local law enforcement.

Comment: A number of commenters asked about soil testing. One commenter stated that the Draft EA did not specify any corrective actions, sanctions, or public recourse should any test results indicate problems. The commenter stated that a sampling requirement of one sample per year was arbitrary and would not adequately protect homeowners from possible water well contamination.

Response: The sampling criteria for spray irrigation systems is dictated by Department Circular DEQ-2, and DEQ cannot require more sampling than laid out by those standards. In this case, DEQ design standards require only that the proposed facility monitor monthly for total nitrogen during periods of use, but the applicant's operation and maintenance manual proposes to sample monthly for total nitrogen, biochemical oxygen demand, total suspended solids, and fecal coliform. The applicant also proposes to sample for trace elements (aluminum, arsenic, beryllium, boron, cadmium, chromium, cobalt, copper, fluoride, free chlorine residual, iron, lead, lithium, manganese, molybdenum, nickel, selenium, vanadium, and zinc) during the first season of operation. The applicant also proposes to sample total nitrogen in the soils at the beginning and end of each operating season, even though such sampling is not required by DEQ. A certified wastewater operator will be responsible for operation and sampling.

Sampling results would be maintained by the owner/certified wastewater operator and must be made available to DEQ upon request. If wastewater sampling exceedances are observed, DEQ has authority to require the owner to remedy the situation, and, if needed, the DEQ Enforcement

Program could be used to achieve compliance. As discussed in Section 2 of the Final EA, the proposed facilities will not discharge to groundwater, so water quality would remain excellent.

Comment: Some commenters asked how private citizens could have access to the soil-testing results.

Response: Sampling results would be maintained by the facility and must be made available to DEQ when requested. DEQ makes public information available upon request. Interested parties can contact DEQ to request to view information in one of our offices at any time. If sample results are outside the design parameters, DEQ can require the facility operation to be modified to meet requirements.

Comment: One comment asked who would monitor the aquifer and the river for increased nitrogen levels and at what intervals and what corrective actions are proposed for increased nitrogen levels.

Response: No downstream sampling of surface water would be required for the spray irrigation systems, because no surface water or groundwater discharge permit is required. Required sampling would be completed regarding the effluent quality and the soils within the spray irrigation area.

Comment: Will drainage ponds be built to contain storm water?

Response: Yes. The design engineer has called these infiltration ponds "Bio Retention areas". Approximately 40 of these detention ponds would utilize both storage and infiltration to capture storm water runoff throughout the RV park.

Comment: One commenter asked whether the storm water detention facilities would cause odor or areas for mosquito breeding.

Response: Unlike the open swales and ponds that are typically used for storm water detention, the proposed bio-retention areas would be predominantly subsurface, so there would be minimal ponded water to create odor or mosquito breeding. Additionally, the porous sandy soils on site will likely infiltrate storm water quickly during more rain events minimizing standing water on site.

Comment: The proposed wastewater treatment system is not community friendly as it will exist in close proximity to residences bringing additional chemical, odor, and runoff issues to a quiet residential area.

Response: No chemicals would be added to the drinking water. No chemicals would be added to the wastewater lagoons. Biological action would be accomplished with the addition of air.

Comment: Several comments expressed concerns about storm water drainage during extreme events, and concerns and questions about absorption abilities generally and during lower temperatures.

Response: Both the pre-development and post-development patterns on this site allow storm water runoff to infiltrate within the property boundaries of the proposed RV park and the adjacent property owned by the applicant. No adjacent homes would be impacted by increased storm water. No runoff would be routed to the Middle Fork River or any surface water body. Both existing and proposed runoff would be diverted around the spray irrigation areas and the sewage lagoon cells utilizing berms and swales.

Circular DEQ-8 Design Standards do not contain requirements for analysis under frozen soil or snow events. However, the amended soil mix in the “Bio-Detention areas” would be constructed to facilitate a large pore spaces, which encourage infiltration. The soils evaluations on the site illustrated quite porous soils, which should allow infiltration during the primary months of operation. Additionally, should the “Bio-Retention Areas” be ineffective due to severe frozen soil and snow accumulation conditions, the overflow would migrate to the adjacent lawn area of the RV spaces, not to off-site land.

Circular DEQ-8 Design Standards take into account the very low permeability of gravel and asphalt pavement, commonly referred to as “impervious surfaces,” assigning them 80% and 90% runoff values. A full topographic map of the drainage patterns of the site and adjacent properties was prepared. You are correct that this property is generally lower elevation than surrounding properties, which prohibit most the runoff from proceeding to higher elevation adjacent areas. Please note, as mentioned previously, Circular DEQ-8 Design Standards allow the equivalent pre-development peak flow rate to continue to pass through the subject property onto adjacent areas. Based on drainage routes, storm runoff would be anticipated to stay on premise, with the exception of some runoff being directed to the roadside swale along the south side of River Bend Drive, which is property owned by GPI.

Comment: Some comments asked about the specifics of the solid waste facilities, stating that bear-proof containers might attract bears and asking whether each spot would have its own bear-proof container, whether GPI would monitor food and garbage from being left out, what the solid waste remove schedule was, and whether bear-proof dumpsters would be used.

Response: The specifics of the solid waste management were covered in the county platting process. The county conditions of approval required the use of bear-proof containers and required that locations for the containers be established within the proposed subdivision. The county conditions also required that wildlife attractants be able to be stored in bear-proof containers at all RV spaces and that appropriate signage be installed to identify RV park rules to minimize wildlife attractants, which would limit potential conflicts with wildlife. Additionally, the Carver Engineering EA states that a number of bear-proof garbage cans will be spread throughout the

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campground and that employees would empty the cans once a day into a large dumpster that would be emptied by Evergreen Disposal on a regular basis. DEQ's rules require only that solid wastes be placed in adequate containers, removed at a frequency to prevent a nuisance, and be sent to an appropriate facility. The Final EA has been updated to include this analysis.