



**Town Pump Whitefish 2
Facility No. 60-15355
FINAL
Environmental Assessment**

**Montana Department of Environmental Quality
Waste and Underground Tank Management Bureau
Underground Storage Tank Section
FINAL ENVIRONMENTAL ASSESSMENT**

COMPANY NAME: Whitefish # 2 Town Pump LLC			
FACILITY NUMBER: 60-15355			
FACILITY NAME: Town Pump Whitefish 2			
PERMIT NUMBER: 21-0175			
APPLICATION DATE: January 28, 2021			
LOCATION: 4825 US HWY 40, Whitefish, MT 59937			COUNTY: Flathead
PROPERTY OWNERSHIP:	FEDERAL <input type="checkbox"/>	STATE <input type="checkbox"/>	PRIVATE <input checked="" type="checkbox"/>
EA PREPARER:	SETH HENDRIX AND JEN LANE		EA DATE: JUNE 15, 2021

COMPLIANCE WITH THE MONTANA ENVIRONMENTAL POLICY ACT

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human or physical environment. The proposed state action is issuance of underground storage tank (UST) installation permit number 21-0175 and an operation permit allowing operation of the underground storage tanks at UST Facility number 60-13355. This environmental assessment (EA) will examine the proposed action, alternatives to the proposed action, and disclose potential impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

SUMMARY OF THE PROPOSED ACTION: Whitefish # 2 Town Pump LLC is proposing to install six new petroleum UST systems at Town Pump Whitefish 2 for storing and dispensing gasoline, diesel, and off-road diesel, constructing and operating a new petroleum fueling station. The proposed UST systems include:

Tank(s): This project involves installing the following six (6) double-walled tanks: 1 - 30,000-gallon regular unleaded gasoline, 1 - 6,000-gallon non-ethanol premium gasoline, 1 - 15,000-gallon ethanol premium gasoline, 1 - 6,000-gallon diesel # 1, 1 - 7,000-gallon off-road dyed diesel, and 1 - 20,000-gallon diesel # 2. All six tanks will be Xerxes Fiberglass Reinforced Plastic (FRP) double-walled brine filled UST systems. Each tank will be utilized by Town Pump Whitefish 2 at a new petroleum fueling site and convenience store.

Piping: All product piping associated with this facility will be NUPI Americas Smartflex secondary contained double-walled electrofusion semi-rigid flexible pipe. Approximately 2,900 feet of double-walled NUPI Americas Smartflex piping will be utilized in this facility.

Sumps: ZCL Xerxes fiberglass tank-top sumps will be installed around each tank's submersible turbine pump. NUPI Americas HDPE under-dispenser containment sumps will be installed under each dispenser. Each tank and piping system will be continuously monitored. Monitoring will be

accomplished via internal tank probes, interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection with programmed 3.0 gph shutdown rate for each of the piping runs. A Veeder Root TLS 450 plus automatic tank gauge (ATG) will continuously monitor all operational parameters.

PURPOSE AND BENEFIT FOR PROPOSED ACTION: DEQ's purpose in conducting this environmental review is to act upon Whitefish # 2 Town Pump LLC's application to authorize the installation of the new UST systems at Facility ID No. 60-15355 south of Whitefish, MT. DEQ's action on the permit application is governed by the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11-212, et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11-501, MCA et seq. and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56.

The benefits of the proposed action include increased and efficient access to fuel for the public, including the availability of non-regulated Diesel Exhaust Fuel (DEF).

REGULATORY RESPONSIBILITIES: In accordance with ARM 17.4.609(3)(c), DEQ must list any state, local, or federal agencies that have overlapping or additional jurisdiction or environmental review responsibility for the proposed action and the permits, licenses, and other authorizations required.

Two City of Whitefish Building permit applications have been applied for by the owner. The Building Permit application number is # C-20-01140. The permit for the canopy installation is pending review. The project includes building of a 6,904-square foot convenience store plus canopy and fueling station. The permit application also includes a parking lot. Soil disturbances and storm water runoff during construction are regulated under the Montana Pollution Discharge Elimination System (MPDES) Authorization. A General Permit for Storm Water Discharges associated with construction activity (MTR100000) has been approved (Permit # MTR108624) from the Montana DEQ Water Protection Bureau.

Table 1: Proposed Action Details

Summary of Proposed Action	
General Overview	Whitefish # 2 Town Pump LLC is proposing to install six new petroleum UST systems for storing and dispensing gasoline, diesel, and off-road diesel at Town Pump Whitefish 2, creating a new petroleum fueling station.
Proposed Action Disturbance & Equipment	
Total Lot Acreage	5.420 acres
Tank Basin dimensions (xyz)	One Tank Basin measuring 59' x 39' x 15'
Piping Trench Linear Feet	2,900 feet double walled non corrodible piping
Electrical Supply Trench Linear Feet	Approximately 200 feet
Truck traffic	3-4 Dump Trucks and 1 gravel shooter
Other equipment	1 large excavator, 1 large backhoe, and 1 skid steer
Proposed Action	

Duration	<p>Construction Start: Would commence after approval of a UST license and all other necessary permits.</p> <p>Construction Period: The construction would last for up to 2 months</p> <p>Construction Hours: Work would occur during shifts which would generally occur during daylight hours.</p> <p>Operational Hours: Hours of Fueling Operation is 24 hours a day</p> <p>Tank Operational Life: Double Walled Fiberglass Reinforced Plastic (FRP) Tank life is typically ~30 years</p>
Construction Equipment	<ul style="list-style-type: none"> - 1 large excavator - 1 large backhoe - 1 gravel shooter - 4 hydraulic lift dump trucks - 1 skid steer - Miscellaneous light vehicles (i.e., 2 ¾ ton pickups)
Location and Analysis Area	<p>Location: The site address is 4825 US HWY 40, Whitefish, MT (see Figure 2). The proposed project is located directly west of the North Valley Hospital in Whitefish, Montana. The property is 2 miles south of Whitefish. The proposed lot is on the corner of U.S. Highway 93 S and U.S. Highway 40 W directly south of Whitefish. (see Figure 1)</p> <p>Analysis Area: The area being analyzed as part of this environmental review includes the immediate project area (Figure 2) as well as neighboring lands surrounding the analysis area as reasonably appropriate for the impacts being considered (typically one mile).</p>
Personnel Onsite	<p>During construction, onsite personnel would vary per task, but generally would include 1-3 equipment operators and laborers. During operation, there would be approximately 6 to 8 personnel, including a store manager, cashier, and maintenance staff. Onsite operation personnel will be trained as Class A operators.</p>
Structures	<p>During the UST installation project, there would be no new structures other than a temporary portable toilet. After UST installation, the site would include a 6,904-square foot convenience store plus canopy and fueling station.</p>
Project Water Source	<p>One water wagon would be used for testing containment sumps after the UST installation is completed. No water use needed for operation.</p>
Supplemental Lighting	<p>During the construction of the UST systems, supplemental lighting would not be anticipated. After installation, there would be canopy lighting associated with the convenience store operation.</p>
Air Quality	<p>During the UST installation, there may be some dust suppression. After installation, the UST system includes vertical vent standpipes, submerged fill pipes, stage-one vapor recovery system and vapory recovery vent pipes to control hydrocarbon vapors.</p>
Water Quality	<p>The project area lies within the Whitefish River watershed. The proposed site would be located approximately 2,570 feet from the Whitefish River, and 1,800 feet away from an unnamed residential pond. There are approximately 83 public and private water wells located within 1 mile of the proposed site. Protection of ambient water quality standards, drinking water maximum contaminant levels, or degradation of</p>

	<p>water quality is mitigated by secondarily contained non-corroding underground tanks/piping and continuous system monitoring.</p> <p>Stormwater would be managed under the Montana Pollutant Discharge Elimination System (MPDES) General Permit for Storm Water Discharges associated with construction activity.</p>
Erosion Control and Sediment Transport	<p>Some topsoil would be removed from the site during the construction phase of this project. Erosion control would be accomplished using a variety of Best Management Practices (BMP) including: straw berms or straw bales placed at all areas of potential runoff from operations to mitigate impacts to surface water quality from stormwater discharges associated with construction of the Facility.</p>
Solid Waste	<p>Garbage cans would be used during installation to collect miscellaneous solid wastes and would be disposed of daily.</p>
Hazardous Substances	<p>Equipment fuel and lubricants would be needed on the site during the construction phase of this project. Petroleum products will be contained in vehicles in original marked containers and a clearly marked slip tank for fuel. No more than 5 gallons of oil and 125 gallons of fuel will be on site at any time during construction of the Facility. The Montana state licensed installer will be performing daily inspections on his equipment to ensure that they are in good operating condition. He and his crew are trained in spill or overfill containment and cleanup. Spill kits and absorbent pads will be onsite at all times on each truck.</p> <p>Once the underground storage tanks are permitted, installed, and tested, petroleum products will be stored in double walled continuously monitored UST systems.</p>
<u>UST Installation, Operation, and Monitoring Requirements</u>	<p>The following compliance, testing, and inspection requirements would be followed regarding this proposed UST installation project:</p> <ol style="list-style-type: none"> 1. Double Walled non-corrodible continuously monitored tanks and piping systems are required for any new UST installation project. 2. An UST installation permit is required to be issued by the DEQ UST program before installation of the regulated UST systems. 3. A DEQ UST program One Time Fill Permit is issued with the UST installation permit. The One Time Fill Permit is issued only for the purpose of testing the UST systems. A One Time Fill Permit is not a permit to dispense fuel or otherwise operate the UST facility. Testing must be conducted on each tank when no less than 90 percent full. 4. The UST installation permit requires numerous tank and piping test requirements including: <ul style="list-style-type: none"> • 0.1 gallon per hour (gph) or 0.2 gph EPA-certified tank test conducted on each tank when at least 90 percent full, • a department approved 0.1 gph or 0.2 EPA-certified ullage tank test,

- function testing of all UST system tank and piping interstitial liquid sensors,
- primary pipe installation line testing,
- secondary pipe installation line testing,
- a 0.1 gph line tightness test conducted on all product lines after the installation is completed,
- Tank Monitor setup and diagnostic testing,
- Tank Monitor programming requirements for tank and piping shutdown on alarms and failed tests,
- Tank Monitor programming for tank and piping leak detection, hydrostatic sump test of all containment sumps (submersible turbine pump sumps, under-dispenser sumps, transition sumps, etc.),
- PEI RP 1200 spill bucket tightness testing of each spill container,
- PEI RP 1200 function testing of each overflow prevention device (automatic shutoff valve, flapper valve, outside high level overflow alarm, etc.),
- certification of compliance signed by the licensed installer,
- signed UST installation permit,
- signed One Time Fill Permit,
- and Unique GPS coordinates at the fill pipe of each newly installed tank.

5. When all installation permit requirements and testing mandates have been satisfied, a Conditional Operating Permit is issued. The Conditional Operating Permit requires an inspection to be completed by a State Licensed UST inspector between 90 and 120 days from the date of issuance.

6. A Full DEQ UST compliance inspection is completed, signed, and submitted by a State Licensed UST inspection to meet the requirements of the Conditional Operating Permit.

7. If the department determines that the UST owner/operator meets the requirements of the Conditional Operating Permit inspection, then the department issues a three-year UST operating permit to the owner/operator.

8. The department 30-day, annual, and three-year compliance requirements are described here:

<http://mtrules.org/gateway/ChapterHome.asp?Chapter=17%2E56>

9. Refuse associated with the UST installation project activities would be collected, removed, and disposed of in proper disposal sites.

10. The notification requirements for DEQ must be fulfilled if a release of petroleum product of 25 gallons or more occurs.

Figure 1: Map of general location of the proposed project.

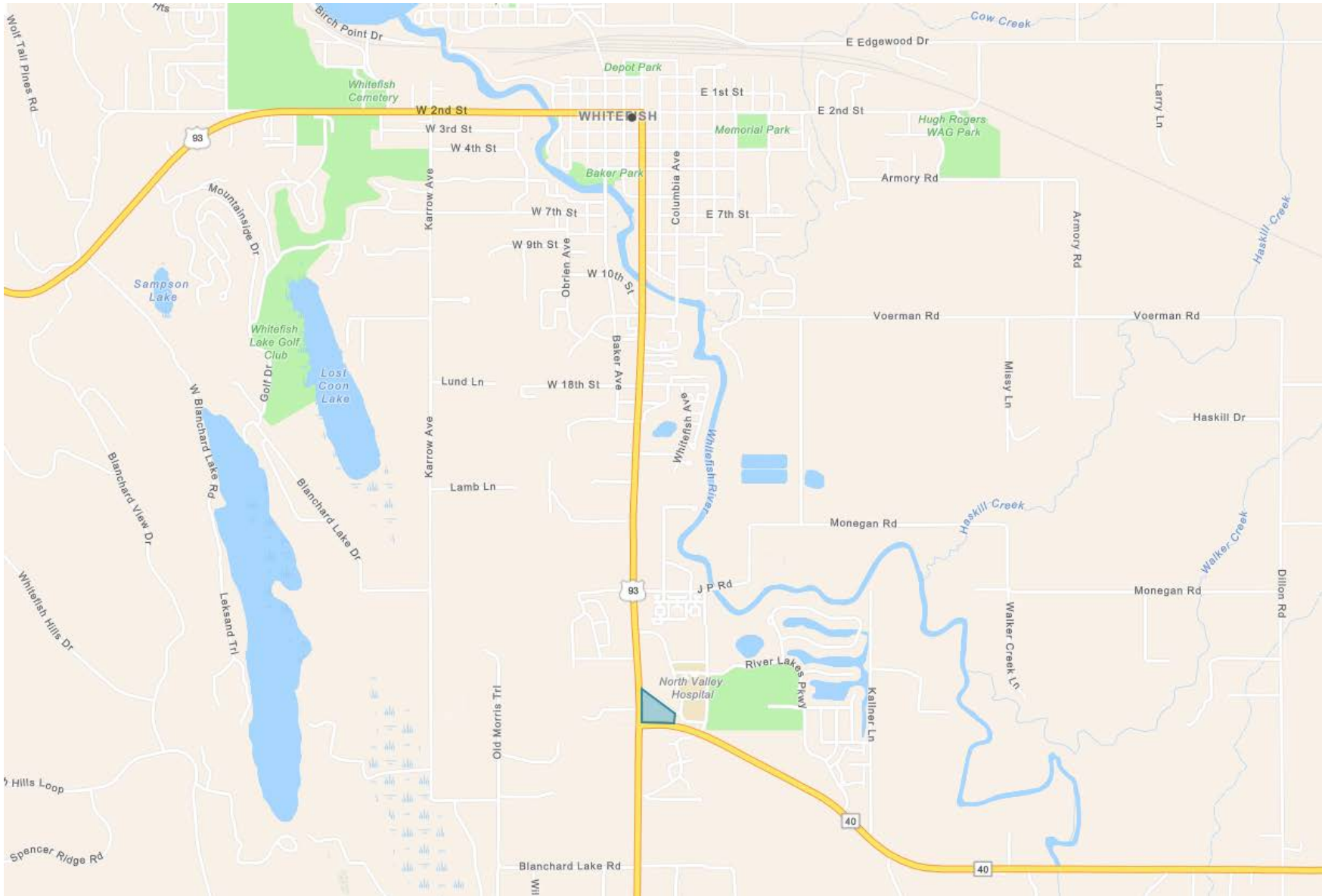


Figure 2: Proposed Project Site highlighted in light Blue - Physical Address: 4825 US Hwy 40, Whitefish, MT 59937



SUMMARY OF POTENTIAL IMPACTS TO THE PHYSICAL AND HUMAN ENVIRONMENT:

The impact analysis will identify and estimate whether the impacts are direct or secondary impacts. Direct impacts occur at the same time and place as the action that causes the impact. Secondary impacts are a further impact to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts analysis will also estimate the duration and intensity of the impact.

The duration is quantified as follows:

- **Short-term:** Short-term impacts are defined as those impacts that would not last longer than the installation of the USTs and operation of the UST Facility.
- **Long-term:** Long-term impacts are impacts that would remain or occur following tank closure and removal.

The intensity of the impacts is measured using the following:

- **No impact:** There would be no change from current conditions.
 - **Negligible:** An adverse or beneficial effect would occur but would be at the lowest levels of detection.
 - **Minor:** The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
 - **Moderate:** The effect would be easily identifiable and would change the function or integrity of the resource.
 - **Major:** The effect would alter the resource.
1. **GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: *Are soils present, which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?***

There are no known fragile or unstable soils identified in the project site by the reviewer. Some topsoil will be removed from the site during the installation of the underground storage tanks.

Direct Impacts:

No unusual or unstable geologic features are present, and no fragile or particularly erosive or unstable soils are present. During installation, impacts to the geology, soil quality, stability and moisture would be short-term and negligible (Table 2).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to the geology and soil quality, stability and moisture would be expected.

2. WATER QUALITY, QUANTITY, AND DISTRIBUTION: *Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?*

The project area receives an average of 20.55 inches of precipitation annually. Important water resources are present within one mile of the proposed project. The project area lies within the Whitefish River watershed. The proposed site would be located approximately 2,570 feet from the Whitefish River, and 1,800 feet away from an unnamed residential pond. If a release of petroleum fuel occurred above ground, the release would likely enter a soil water separator tank or possibly enter the city of Whitefish stormwater system.

Soil disturbances and storm water during construction would be managed under the Montana Pollutant Discharge Elimination System (MPDES) General Permit for Storm Water Discharges associated with construction activity. The applicant will need to obtain authorization to discharge under the General Permit for Storm Water Discharges associated with construction activity prior to ground disturbance.

A search of the Groundwater Information Center (GWIC) indicated that 83 public and private wells are located within one mile of the proposed site. For the project area, approximate depth to groundwater is between 55-60 feet (GWIC Records 86467 and 86489). The nearest well is 0.11 miles from the proposed project. If a release of petroleum fuel occurred from the underground tank and piping system, it would enter the tank basin. Depending on the quantity of a release, product could move into native soil and groundwater.

Protection of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by secondarily contained non-corroding underground tanks/piping and continuous system monitoring. Proper operation of this system would significantly decrease the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondary containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment and by making early detection of releases possible. The Facility UST systems must meet State installation standards and Montana DEQ UST program construction permit requirements.

Tank leak detection equipment would be installed at the facility. The facility would utilize tank interstitial monitoring sensors. The console would conduct 3.0 gph test after every dispense cycle for the catastrophic leak detection. Piping leak detection equipment would also be utilized, and liquid sensors would be placed in the dispenser sump and submersible turbine pump (STP) sump. If a leak occurs, the fuel pumping system automatically shuts down and cannot be energized again until the source of the leak is identified and addressed. Further, leak detection systems must meet leak rate detection standards of a probability of detection of 0.95 and a probability of false alarm of 0.05. Finally, these systems are designed and programmed to shut down on detecting leaks as small as 0.2 gallons per hour.

The applicant would install overflow prevention valves for overflow prevention on the tank system

and use secondary containment sumps. Single-wall round tank sumps would be installed around all STPs. Sump boots would be installed at each sump penetration that are compatible with the piping. All sumps would be tested according to the specific installation conditions.

No wetlands were identified within 1 mile of the project area. No land disturbance or work is proposed within wetland or riparian areas.

Direct Impacts:

Mitigation and monitoring plans reduce the likelihood of a petroleum fuel product release to the environment. Should a release occur, mitigation and monitoring plans also reduce the amount of product released to the environment. Direct impacts to surface and/or ground water are not expected. However, should a release occur and it is not properly contained, the impacts could be long term and moderate (Table 2).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to water quality, quantity and distribution would be expected. However, should a release of petroleum fuel product occur and it is not properly contained, it could secondarily impact aquatic species in the Whitefish River and/or the City of Whitefish stormwater system.

3. AIR QUALITY: *Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I Airshed)?*

It is anticipated that natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Petroleum vapors will be mitigated by natural air currents, submerged fill pipes, stage-one vapor recovery system and vapor recovery vent pipes will control hydrocarbon vapors. The proposed project site is not located in a Class I Airshed. The closest Class I Airshed is located at least 18 miles away from the project site (Glacier National Park).

Direct Impacts:

During construction of the UST installation project, dust particulate may become airborne. However, the applicant would be required to comply with the City of Whitefish dust control plan. Impacts to air quality during the UST installation project, would be short-term and negligible (Table 2).

During operation of the UST system, natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Additionally, there may be local impacts associated within increased truck and automobile traffic. Impacts to air quality would be long-term and minor (Table 2).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to air quality would be expected.

4. VEGETATION COVER, QUANTITY AND QUALITY: *Will vegetative communities be significantly impacted? Are any rare plants or cover types present?*

Montana Cadastral lists this property, which is owned by Montana Commerce LLC, as Property Type VAC_R – Vacant Land - Rural. It has been reported that several evergreen trees have been removed from the property recently in anticipation of this project. The location currently is surrounded by several large and small-scale businesses and private residential properties are in the vicinity. No rare plants or cover types are reported to this reviewer.

Direct Impacts:

Some vegetation has been removed from the project area and much of the site will be paved after completion. Due to the size of the project area and the absence of rare plants and cover, impacts to vegetative cover, quantity or quality resulting from this project would be long-term and negligible (Table 2).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to vegetation cover, quantity and quality would be expected.

5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: *Is there substantial use of the area by important wildlife, birds or fish?*

No known use of this project site by important wildlife, birds, or fish has been identified. The project site is not in the core, general, or connective sage grouse habitat areas as designated by the Montana Sage Grouse Habitat Conservation Program. There are no listed United States Fish Wildlife Service Critical Habitat areas located within 1 mile of the proposed site.

Direct Impacts:

There is no substantial use of this area by important wildlife, bird, or fish. No impacts to important terrestrial, avian and aquatic life and habitats are expected.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts or further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to terrestrial, avian and aquatic life and habitats stimulated or induced by the

direct impacts analyzed above would be expected, however, in the water quality section of this environmental assessment, it was identified that secondary impacts from a petroleum fuel release could impact downstream aquatic life.

6. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: *Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?*

The project site is not in the core, general, or connective sage grouse habitat areas as designated by the Montana Sage Grouse Habitat Conservation Program. There are seven (7) endangered species listed for Flathead County: Bull Trout, Grizzly Bear, Spalding's Campion, Canada Lynx, Yellow-billed cuckoo, Meltwater Lednian Stonefly, and Whitebark Pine. There are 78 animal species of concern and 131 plant species of concern identified in Flathead County. No federally listed endangered species, threatened species, species of concern, or identified habitat areas were identified within a mile of the project area. Aquatic habitats in the Whitefish River Watershed are located within 2,500 feet of the project site.

Direct Impacts:

There are no federally listed endangered species, threatened species, species of concern, or identified habitat areas within the project area. Within the one-mile analysis area, Bull Trout may be present in the Whitefish River. Bull Trout are listed as threatened species by The U.S. Fish & Wildlife Services (USFWS). Whitefish Lake is designated critical Bull Trout habitat by USFWS, however the Whitefish River has no designation. No direct impacts to unique, endangered, fragile or limited environmental resources are expected (see secondary impacts).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to unique, endangered, fragile, or limited environmental resources that could be stimulated or induced by the direct impacts analyzed above would be expected. However, secondary impacts from a petroleum fuel release could impact downstream aquatic life, including USFWS designated threatened Bull Trout.

7. HISTORICAL AND ARCHAEOLOGICAL SITES: *Are any historical, archaeological or paleontological resources present?*

The National Register of Historic Places lists 142 National Historic Landmarks in Flathead County. There are no listed structures at the project site. There are no known archeological or paleontological resources reported to the reviewer. The State Historic Preservation Office (SHPO) conducted a resource file search for Section 12, Township 30 North, Range 22 West, which indicated that there have been a few previously recorded sites within the designated search locale, but not within the project location. In addition to the sites found in the search, there have been a few previously conducted cultural resource inventories done in the area.

No cultural inventories have been done within the project location. It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place. As long as there will be no disturbance or alteration to structures over fifty years of age, SHPO determined that there is a low likelihood that cultural properties will be impacted.

SHPO determined that a recommendation for a cultural resource inventory is unwarranted at this time. Should anything be encountered, DEQ and SHPO will be appropriately notified.

Direct Impacts:

There are no historical, archaeological, or paleontological resources present within the project area. Project area is heavily disturbed, indicating a low potential for intact buried deposits. No direct impacts to historical and archaeological sites are expected.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to historical and archaeological sites would be expected.

8. AESTHETICS: *Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?*

Town Pump Whitefish 2 will be visible from U.S. Highway 93 S and U.S. Highway 40 and will be located directly west of the North Valley Hospital in Whitefish, Montana. The property is 2 miles south of Whitefish. The proposed project (installation of underground storage tank systems, and operation of storage tanks and piping) will be buried underground. Appurtenant above ground equipment will be visible but is consistent with the existing character of the adjacent commercial properties. Other neighboring existing businesses include the North Valley Hospital, TownePlace Suites by Marriott, Hampton Inn & Suites Whitefish, Les Schwab Tire Center, Orient Express, Western Building Center Whitefish, Hank's Hatchets Axe Throwing, Whitefish Marine, Hill Brother Auto Body & Towing, and Advance Composting Systems. There are some residential properties within 1 mile of the project area.

There are no prominent topographic features within the project area. The project will be visible to the surrounding populated area; however, the project area is not considered scenic.

During the construction of the UST installation project, there would be noise associated with the operation of heavy equipment. After the project is completed, there would be vehicle traffic noise and lighting associated with the convenience store and canopy. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA (see Cumulative Impacts on Table 2).

Direct Impacts:

During construction of the UST installation project, there would be short-term and minor impacts to residents due to the project area's proximity to residential properties.

The above ground components of the UST systems at the proposed project would be visible to the surrounding population. Due to the limited above ground components of the UST systems, the visual impacts would be long-term and negligible (Table 2).

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to area aesthetics would be expected as a result of the proposed work.

9. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: *Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?*

This project will permit the installation of USTs on a rural vacant lot. This UST installation project will not otherwise use existing environmental resources of land, water, air, or energy. There are no other nearby activities identified near the project area that may be unduly impacted. The neighboring land uses are mixed commercial with residential properties located within one mile of the project.

Direct Impacts:

The USTs will be installed on rural vacant land. This UST installation project will not otherwise use existing environmental resources of land, water, air, or energy. No impacts to environmental resources of land, water, air, or energy are expected.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated or induced by, or otherwise result from a direct impact of the action. No secondary impacts to environmental resources of land, water, air, or energy would be expected.

10. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: *Are there other activities nearby that will affect the project?*

Two City of Whitefish Building permit applications have been applied for by the owner. The Building Permit application number is # C-20-01140. The permit for the canopy installation is pending review. The Whitefish Building permit includes the construction of a 6,904-square foot convenience store, paving, sewer, and stormwater. A separate permit is pending for electrical

and canopy installation. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA.

Montana DEQ Federal Superfund Program does not have a project on this project site. There are no other known environmental studies or projects on this land.

Direct Impacts:

Impacts on other environmental resources are not likely to occur as a result of this project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated or induced by, or otherwise result from a direct impact of the action. No secondary impacts to other environmental resources would be expected as a result of the proposed action.

11. HUMAN HEALTH AND SAFETY: *Will this project add to health and safety risks in the area?*

The applicant would be required to adhere to all applicable state, federal, and city of Whitefish safety laws. During the construction phase of this project, there are safety risks to the UST system installation crew. Industrial work such as the work proposed by the applicant is inherently dangerous. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor.

While the UST facility is in operation, it is anticipated that natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Tank and piping leak detection equipment is designed to detect releases before serious environmental, health or safety problems occur.

Ambient water quality standards, drinking water maximum contaminant levels, and degradation of water quality would be protected by secondarily contained non-corroding underground tanks/piping with continuous system monitoring, which reduces the risk of a petroleum release into the environment.

Proper operation of the installed leak detection systems and compliance with department UST operating requirements mitigate potential risks to human health and safety by making early detection of releases possible and by immediately reducing the amount of fuel available to be released into the environment.

Once the UST installation project is completed, the main source of safety risk would be vehicle traffic. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA.

Direct Impacts:

During the construction phase and the UST facility operational life, the applicant would be

required to adhere to all applicable state, federal, and city of Whitefish safety laws, therefore, impacts to human health and safety would be short-term and minor.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated or induced by, or otherwise result from a direct impact of the action. No secondary impacts to human health and safety would be expected as a result of the proposed work.

12. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: *Will the project add to or alter these activities? Will grazing lands, irrigation waters or crop production be affected?*

This project will change the zoning of the project area from rural vacant land to commercial. Grazing lands, irrigation waters, crop production, and industrial activity will not be affected by this project. No impacts to adjacent commercial or agricultural activities are anticipated that are related to this project.

Direct Impacts:

There would be no impacts to industrial or agricultural activities or production. However, the change in property zoning from rural vacant land to commercial would be long-term and negligible due to neighboring commercial and residential uses.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated or induced by, or otherwise result from a direct impact of the action. No secondary impacts to industrial, commercial and agricultural activities and production would be expected as a result of the proposed work.

13. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: *Will the project create, move or eliminate jobs? If so, estimated number.*

During the construction phase of this UST installation project, approximately 4 jobs will be created for a period of 2-3 months. The project result (convenience store) is anticipated to have potential to generate community and personal income in the local area. Once the facility building project is completed, Town Pump plans to hire approximately 20 part-time or full-time employees. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA (see Cumulative Impacts on Table 2).

Direct Impacts:

Significant positive or negative impacts on quantity and distribution of employment would not likely result from this project. The project plan calls for several limited duration contracted and otherwise employed people at the site. No lasting positive or negative impacts to employment would be expected from this project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to quantity and distribution of employment would be expected as a result of the proposed work.

14. LOCAL AND STATE TAX BASE AND TAX REVENUES: *Will the project create or eliminate tax revenue?*

The UST installation project is not expected to create or eliminate tax revenue. However, it is anticipated that the fueling station and convenience store associated with this proposal will generate additional local and state tax revenue. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA (see Cumulative Impacts on Table 2). The property valuation is listed as \$5.0 Million on the City of Whitefish building permit.

Direct Impacts:

There would be no impacts to local and state tax base and tax revenues from this UST installation project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to local and state tax base and tax revenues would be expected as a result of the proposed work.

15. DEMAND FOR GOVERNMENT SERVICES: *Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?*

The UST installation project would add additional truck traffic to U.S. Highway 93 S and U.S. Highway 40 in Whitefish, Montana for a period of 2 to 3 months.

The project result (convenience store and fueling station) would increase traffic entering and exiting the fueling station on the corner of U.S. Highway 93 S and U.S. Highway 40 in Whitefish, Montana. The activities associated with this fueling station and convenience store are analyzed in

the Cumulative Impacts section of this EA (see Cumulative Impacts on Table 2).

An increase in law enforcement and fire protection activities (increased calls and routine patrols) in the area may be necessary.

Direct Impacts:

During construction of the UST systems, there would be a temporary increase in traffic on existing roads. The impact would be short-term and minor.

The project result (convenience store and fueling station) may increase demand for fire protection and law enforcement.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. A temporary increase in vehicle traffic during construction of the UST systems may increase the risk of vehicle collisions and traffic violations; therefore, secondary impacts to the demand for government services may occur.

16. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: *Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?*

There are no known local, county, state, or federal environmental management plans that would impact this project development. The proposed project and associated development are expected to be in conformance with current City of Whitefish, Flathead County, and State of Montana zoning requirements.

Direct Impacts:

DEQ is not aware of any other locally adopted environmental plans or goals that would impact this proposed project or the project area. Impacts from or to locally adopted environmental plans and goals would not be expected as a result of this project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to the locally adopted environmental plans and goals would be expected as a result of the proposed work.

17. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: *Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?*

Designated USFS National Forest recreational property is located within 6 miles (Flathead National

Forest) of the project site but is not accessed through the project location. Whitefish Lake Golf Club is located 2.46 miles north of the proposed site. Grouse Mountain Lodge is located 2.37 miles north of the proposed site. Whitefish Mountain Ski Resort is located 7.09 miles north of the proposed site. Recreation areas on the Whitefish River are located within 2,577 feet from the project area. Big Sky Waterpark is located 8.37 miles east of the project site. No designated recreational properties are located within or accessed through the project area. It is not anticipated that this project site has recreational potential.

Direct Impacts:

No impacts to the access or quality of recreational and wilderness activities would be expected to result from the project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to access and quality of recreational and wilderness activities would be expected as a result of the proposed work.

18. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: *Will the project add to the population and require additional housing?*

It is not anticipated that the project (underground tank installations) will add to the population or require additional housing. The project result (convenience store) has limited potential to add to the population and require additional housing. The activities associated with this fueling station and convenience store are analyzed in the Cumulative Impacts section of this EA (see Cumulative Impacts on Table 2).

Direct Impacts:

No impact to population density and housing would be expected from this UST installation project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to density and distribution of population and housing would be expected as a result of the proposed work.

19. SOCIAL STRUCTURES AND MORES: *Is some disruption of native or traditional lifestyles or communities possible?*

Although the continued industrial development of the native landscape is detrimental to the traditional lifestyles of indigenous communities, the preexisting ground disturbance and

development at and around the project location already precludes its use for traditional purposes.

Direct Impacts:

The proposed project would occur entirely on private land owned by Town Pump. Due to the existing disruption of the natural environment, no impacts of native or traditional lifestyles would be expected.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated or induced by, or otherwise result from a direct impact of the action. No secondary impacts to social structures and mores would not be expected as a result of the proposed work.

20. CULTURAL UNIQUENESS AND DIVERSITY: *Will the action cause a shift in some unique quality of the area?*

The proposed project is consistent with the existing character of the adjacent commercial properties. Other neighboring existing businesses include the North Valley Hospital, TownePlace Suits by Marriott, Hampton Inn & Suites Whitefish, Les Schwab Tire Center, Orient Express, Western Building Center Whitefish, Hank’s Hatchets Axe Throwing, Whitefish Marine, Hill Brother Auto Body & Towing, and Advance Composting Systems. No impacts to cultural uniqueness and diversity would be expected from this project. It is not anticipated that the action will cause a shift in the unique quality of the area.

Direct Impacts:

No impacts to cultural uniqueness and diversity would be expected from this project.

Secondary Impacts:

As defined in ARM 17.4.603(18), secondary impacts are further impacts to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action. No secondary impacts to cultural uniqueness and diversity would be expected as a result of the proposed work.

21. PRIVATE PROPERTY IMPACTS: *Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category.) If not, no further analysis is required. Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required. Does the agency have legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternatives.*

The proposed project would take place on private land owned by the applicant. DEQ's approval of the UST installation project may affect the use of real property by the applicant and by nearby private landowners. DEQ has determined, however, that the license conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Underground Storage Tank Act, which will minimize risk of petroleum impacts on neighboring properties, and compliance with UST requirements has been agreed to by the applicant. Therefore, DEQ's approval of the proposed action would not have private property-taking or damaging implications.

22. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:

Due to the nature of the proposed activities, no further direct or secondary impacts would be anticipated from this project.

ALTERNATIVES CONSIDERED:

In addition to the proposed action, DEQ also considered the "no action" alternative. The "no action" alternative would deny the approval of the proposed action. The applicant would lack the authority to install the UST system on their private land. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations as required for approval, the "no action" alternative would not be appropriate. Pursuant to MCA, § 75-1-201(4) DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment.

CUMULATIVE IMPACTS:

Cumulative impacts are the collective impacts on the human environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through preimpact statement studies, separate impact statement evaluation, or permit processing procedures.

This environmental review analyzes the proposed project submitted by the applicant. In addition to

the proposed action, the applicant is seeking or obtaining various permits and licenses for the building and operation of a fueling station and convenience store. The activities associated with this fueling station and convenience store are described below.

The area of proposed project would be located on the corner of U.S. Highway 93 S and U.S. Highway 40 W directly south of Whitefish, Montana. The site is currently a 5.420-acre lot and is generally located west of the North Valley Hospital. The Whitefish 2 convenience store is part of the City of Whitefish Building permit # C-20-01140. The Whitefish Building permit includes the construction of a 6,904-square foot convenience store, paving, sewer, and stormwater. A separate permit is pending for electrical and canopy installation. The applicant has obtained a MPDES General Construction Permit (Permit # MTR108624).

No other FWP, DNRC, BLM, or USFS regulated projects were identified within one mile of the proposed project.

DEQ considered all impacts related to this project and secondary impacts that may result. Cumulative impacts related to this project are identified in the Table 2. Cumulative impacts related to this project would not be significant.

PUBLIC INVOLVEMENT:

DEQ published a legal notice for the Draft EA and 10-day public comment period in the Whitefish Pilot newspaper for one day and the Daily Interlake newspaper for four consecutive days. A copy of this Environmental Assessment has been posted on our website at <http://deq.mt.gov/Land/ust/ea>.

The cover letter and Final EA were also emailed to the Salish-Kootenai Tribal Historic Preservation Office (THPO) by James Strait, DEQ's Tribal Liaison Officer.

Internal scoping consisted of internal review of the environmental assessment document by, Senior UST Environmental Specialist, Seth Hendrix and Senior MEPA Coordinator, Jen Lane. Scoping efforts also included queries to the following websites/ databases/ personnel:

- Montana State Historic Preservation Office
- Montana Sage Grouse Habitat Conservation Program
- Montana Fish, Wildlife, and Parks
- Montana Department of Environmental Quality
- City of Whitefish, MT
- US Geological Society – Stream Stats
- Montana Natural Heritage Program
- Montana Cadastral Mapping Program
- Montana Groundwater Information Center
- Montana Bureau of Mines and Geology
- United States Department of Fish and Wildlife Service
- Google Maps

OTHER GOVERNMENTAL AGENCIES WITH JURSDICTION:

The proposed project would be fully located on private land owned by Town Pump, LLC. All applicable state and federal rules must be adhered to, which, at some level, may also include other local, state, federal, or tribal agency jurisdiction.

NEED FOR FURTHER ANALYSIS AND SIGNIFICANCE OF POTENTIAL IMPACTS

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in the Administrative Rules of Montana (ARM) 17.4.608, which are as follows:

1. The severity, duration, geographic extent, and frequency of the occurrence of the impact; “Severity” is analyzed as the density of the potential impact while “extent” is described as the area where the impact is likely to occur. An example could be that a project may propagate ten noxious weeds on a surface area of 1 square foot. In this case, the impact may be a high severity over a low extent. If those ten noxious weeds were located over ten acres there may be a low severity over a larger extent.
“Duration” is analyzed as the time period in which the impact may occur while “frequency” is how often the impact may occur. For example, an operation that occurs throughout the night may have impacts associated with lighting that occur every night (frequency) over the course of the one season project (duration).
2. The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
3. Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
4. The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
5. The importance to the state and to society of each environmental resource or value that would be affected;
6. Any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
7. Potential conflict with local, state, or federal laws, requirements, or formal plans.

Table 2: Summary of Potential Impacts.

Potential Impact	Affected Resource	Severity ¹ , Extent ² , Duration ³ , Frequency ⁴ , Uniqueness and Fragility (U/F)	Probability ⁵ impact will occur	Cumulative Impacts	Measures to reduce impact as proposed by applicant	Significance (yes/no)
Top Soil Removal and Erosion	1.) Geology	S-low: Of the 5.4 acres lot, approximately 2,500 square feet would be disturbed by the UST system, which could be susceptible to erosion during construction. E-low: Total surface disturbance would be under 2,500 square feet. D-Construction/Installation is expected to last between 2-3 months where soil disturbance may cause a potential impact. F-During occasional storm events.	Possible	Soil disturbance and possible erosion would add to cumulative impacts associated with construction of the convenience store and fueling canopy in the proposed project area.	Erosion control would be accomplished using a variety of Best Management Practices (BMP), implement under an MPDES Permit for Storm Water discharges associated with construction activity, including: straw berms or straw bales placed at all areas of potential runoff from operations.	No
Fuel Release	2.) Water Quality	S-low: Tank and piping design, continuous monitoring systems, and DEQ mandated shutdown requirements limit the severity of a major fuel spill occurrence. E-low: Depth to groundwater at the site is between 50-60 feet and distance to the Whitefish River is 2,570 feet. Tank and piping design, continuous monitoring systems, and DEQ mandated shutdown requirements limit the geographic extent of a major fuel spill occurrence. D-Construction/Installation is expected to last between 2-3 months. The expected operational life of the underground tanks are approximately 30 years. F-The probability of a large fuel release that would impact water quality is low.	Possible	The convenience store and fueling canopy in the proposed project area would have a cumulative impact on water quality and stormwater drainage from smaller spills which can occur during vehicle refueling and vehicle oil leaks. Due to operator error, fuel truck overfills may also occur.	Proper operation of this system would significantly decrease the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondary containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment and by making early detection of releases possible. The applicant would install overfill prevention valves for overfill prevention on the tank system and use secondary containment sumps. Single-wall round tank sumps would be installed around all STPs. Sump boots would also be installed at each sump penetration that are compatible with the piping. All sumps would be tested according to the specific installation conditions.	No
Dust, equipment exhaust, and petroleum vapor	3.) Air Quality	S-low: Dust and other particulate would be generated during construction. Engines would produce some exhaust fumes. During operation, petroleum vapors will be released through vertical vent standpipes with height requirements and Stage 1 Vapor Recovery Systems at a low and safe level. E-low: During construction, dust and exhaust fumes would be generated in proximity of moving/working equipment. During operation, petroleum vapors will dissipate with the natural air currents through vertical vent standpipes and Stage 1 Vapor Recovery Systems. D- Construction/Installation is expected to last between 2-3 months where dust and equipment exhaust may cause a potential impact. The expected operational life of the underground tanks are approximately 30 years. F-Daily	Certain	Dust and exhaust would add to the cumulative impacts from other vehicles/engines operating in the area, and to potential natural wildfire smoke moving through the area.	During operation, petroleum vapors will dissipate with the natural air currents through vertical vent standpipes and Stage 1 Vapor Recovery Systems. The site would need to comply with the City of Whitefish's dust control plan.	No
Removal of Vegetation	4.) Vegetation	S-low: Trees were cleared by the landowner. E-low: Approximately 5 acres of ground would be impacted, approximately 2,500 square feet for the proposed project, the remaining disturbance would be from the convenience store and fueling station. D- Construction/Installation is expected to last between 2-3 months where dust and equipment exhaust may cause a potential impact. The expected operational life of the underground tanks are approximately 30 years. F-Daily	Certain	Removal of vegetation from the privately-owned land would have no cumulative impact with the surrounding commercial and residential area.	None proposed	No
Visual, Noise, Odor	8.) Aesthetics	S-low: There are no prominent topographic features within the project area. The project will be visible to the surrounding populated area; however, the project area is not considered scenic. E-low: Total surface disturbance is approximately 2,500 square feet. After construction, the only visible feature would be the vertical standpipes. Construction noise would be present during installation. After construction, the proposed project itself produces no noise. D- Construction/Installation is expected to last between 2-3 months where dust and equipment exhaust may cause a potential impact. The expected operational life of the underground tanks are approximately 30 years. F-Daily	Certain	Impacts to area aesthetics as a result of this project would add to the cumulative impacts associated with the surrounding commercial and residential area.	During operation, petroleum vapors will dissipate with the natural air currents through vertical vent standpipes and Stage 1 Vapor Recovery Systems. Stage 1 Vapor Recovery Systems and vertical vent standpipes are designed to keep Odor and petroleum vapors within a safe level. The tanks and all the associated product piping will be buried underground, while appurtenant equipment is above ground. The general topography will not change. Surface features will be consistent with retail petroleum re-fueling facilities.	No
Traffic and Vapor	11.) Human Health and Safety	S -low: During construction of the UST systems, a temporary increase in traffic would be added to existing roads creating a potential for traffic accidents. Once installed, natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Tank and piping leak detection equipment is designed to detect releases before serious health or	Certain	Once the UST installation project is completed, the main source of safety risk would be vehicle traffic.	Proper operation of this leak detection systems and department UST operating requirements mitigate potential risks to human health and safety by making early detection of releases possible and by immediately reducing the amount of	No

		<p>safety problems occur. Natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level.</p> <p>E – low: Construction equipment would be hauled in and off site and not enter the roadway. Minimal traffic increases would be due to highway vehicles carrying construction crews.</p> <p>D – Construction/Installation is expected to last between 2-3 months.</p> <p>F- Daylight hours during construction and continuous once operational.</p>			fuel available to be released into the environment.	
Land Use Change	12.) Industrial, Commercial And Agricultural Activities And Production:	<p>S -low: This project will change the zoning of the project area from rural vacant land to commercial in an already developed commercial area.</p> <p>E – low: The change in land use would change a vacant 5.420 acre lot to commercial.</p> <p>D – Land use changes are controlled by local zoning laws.</p> <p>F- Continuous</p>	Certain	There would be no cumulative impacts to industrial or agricultural activities or production. The change in property zoning from rural vacant land to commercial would have a negligible cumulative impact on the surrounding area.	None Proposed	No
Law Enforcement and Fire Protection	15.) Demand for Government Services	<p>S -low: During construction of the UST systems, a temporary increase in traffic would be added to existing roads creating a potential for traffic accidents.</p> <p>E – low: Construction equipment would be hauled in and off site and not enter the roadway. Minimal traffic increases would be due to highway vehicles carrying construction crews.</p> <p>D – Construction/Installation is expected to last between 2-3 months</p> <p>F- Daily for 2-3 months</p>	Possible	<p>The project result (convenience store and fueling station) would increase traffic entering and exiting the fueling station on the corner of U.S. Highway 93 S and U.S. Highway 40 in Whitefish, Montana.</p> <p>An increase in law enforcement and fire protection activities (increased calls and routine patrols) in the area may be necessary.</p>	None Proposed	No

1. Severity describes the density at which the impact may occur. Levels used are low, medium, high.
2. Extent describes the land area over which the impact may occur. Levels used are small, medium, and large.
3. Duration describes the time period over which the impact may occur. Descriptors used are discrete time increments (day, month, year, and season).
4. Frequency describes how often the impact may occur.
5. Probability describes how likely it is that the impact may occur without mitigation. Levels used are: impossible, unlikely, possible, probable, certain

SIGNIFICANCE DETERMINATION

The severity, duration, geographic extent and frequency of the occurrence of the impacts associated with the proposed state action would be limited. Whitefish # 2 Town Pump LLC is proposing to install six new petroleum UST systems at Town Pump Whitefish 2 for storing and dispensing gasoline, diesel, and off-road diesel, constructing and operating a new petroleum fueling station. The proposed UST systems include: installing the following six (6) double-walled tanks: 1 - 30,000-gallon regular unleaded gasoline, 1 - 6,000-gallon non-ethanol premium gasoline, 1 - 15,000-gallon ethanol premium gasoline, 1 - 6,000-gallon diesel # 1, 1 - 7,000-gallon off-road dyed diesel, and 1 - 20,000-gallon diesel # 2. Each tank would be utilized by Town Pump Whitefish 2 at a new petroleum fueling site and convenience store.

DEQ has not identified any significant impacts associated with the proposed installation and operation for any environmental resource. Approving Whitefish #2 Town Pump LLC's installation and operation does not set precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the applicant submits another license application, DEQ is not committed to issue those authorizations. DEQ would conduct an environmental review for any subsequent authorizations sought by the applicant. DEQ would make a decision based on the criteria set forth in the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11-212, et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11-501, MCA et seq. and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56.

Approving permit number 21-0175 and an operation permit allowing operation of the underground storage tanks at UST Facility number 60-13355 does not set a precedent for DEQ's review of other applications, including the level of environmental review. The level of environmental review decision is made based on a case-specific consideration of the criteria set forth in ARM 17.4.608.

EQ does not believe that the proposed state action has any growth-inducing or growth-inhibiting aspects or is in conflict with any local, state, or federal laws, requirements, or formal plans. Based on a consideration of the criteria set forth in ARM 17.4.608, the proposed state action is not predicted to significantly impact the quality of the human environment. Therefore, at this time, preparation of a final environmental assessment is determined to be the appropriate level of environmental review under the Montana Environmental Protection Act.

Recommendation for Further Environmental Analysis:

EIS More Detailed EA No Further Analysis

Environmental Assessment and Significance Determination Prepared By:



Seth Hendrix,

Senior Environmental Science Specialist - Underground Storage Tank Section
Waste and Underground Tank Management Bureau

**RESPONSE TO COMMENTS ON THE ENVIRONMENTAL ASSESSMENT FOR A NEW
UNDERGROUND STORAGE TANK FACILITY (I.D. NO. 60-15355) AT TOWN PUMP #2 WHITEFISH**

On May 14, 2021, the Montana Department of Environmental Quality (DEQ) underground storage tanks (UST) program published the draft environmental assessment (EA) assessing impact on the physical and human environment arising from installation and operation of UST systems at the proposed Town Pump Whitefish 2 in Whitefish, Montana. Written public comments were due May 28, 2021.

DEQ received one public comment on the proposed Town Pump Whitefish 2 draft EA.

Public Comment Number 1: My comment regarding the new Town Dump gas station and its proposal for top notch fuel tanks: Why not just use the existing power to install chargers for electric vehicles? A lot of trees among other things could have been saved.

Response: Thank you for commenting on the Town Pump Whitefish 2 draft EA. DEQ analyzed the environmental impacts of the proposed state action, which is issuance of the UST installation and operating permits for the Town Pump Whitefish 2. The state action does not authorize or sponsor the construction or operation of the new Town Pump Whitefish 2 gas station and convenience store. Under MEPA, DEQ is precluded from analyzing a facility that is an alternative to the facility proposed by the applicant. See 75-1-220(1), MCA (available online at https://leg.mt.gov/bills/mca/title_0750/chapter_0010/part_0020/section_0200/0750-0010-0020-0200.html), which defines “alternatives analysis” as follows: “an evaluation of different parameters, mitigation measures, or control measures that would accomplish the same objectives as those included in the proposed action by the applicant. For a project that is not a state-sponsored project, it does not include an alternative facility or an alternative to the proposed project itself.” Therefore, DEQ may not consider electronic charging stations and trees as alternatives to the facility proposed by the applicant. It would be up to the owner as to whether or not they want to install chargers for electric vehicles. Whitefish’s City Council approved a memorandum of understanding that requires Town Pump to plant 22 trees with input from the town’s arborist, hire a certified arborist to establish a tree protection zone for the rest of the construction, and to submit a landscaping plan for the council to approve.