FINAL ENVIRONMENTAL ASSESSMENT

April 9, 2026

Water Quality Division

Montana Department of Environmental Quality

PROJECT/SITE NAME: Blackfoot Crossing Wastewater Treatment Facility

APPLICANT/COMPANY NAME: Blackfoot Crossing, LLC

PROPOSED PERMIT/LICENSE NUMBER: EQ 25-2244

LOCATION: Township 13 North, Range 18 West, Section 21

COUNTY: Missoula

PROPERTY OWNERSHIP: PRIVATE

TABLE OF ACRONYMS AND ABBREVIATIONS

ARM	Administrative Rules of Montana
BMP(s)	Best Management Practice(s)
BOD	Biochemical Oxygen Demand
Circular DEQ-2	Montana Design Standards for Public Sewage Systems
Circular DEQ-7	Montana Nondegradation Policy
CO	Carbon Monoxide
DEQ	Montana Department of Environmental Quality
DNRC	Montana Department of Natural Resources and Conservation
EA	Environmental Assessment
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
gpd	Gallons per Day
GW	Groundwater
LE	Listed Endangered
LT	Listed Threatened
MBR	Membrane Bioreactor
MCA	Montana Code Annotated
MEPA	Montana Environmental Policy Act
MGWPCS	Montana Ground Water Pollutant Control System
MPDES	Montana Pollutant Discharge Elimination System
MS4	Municipal Separate Storm Sewer System
MTFWP	Montana Department of Fish, Wildlife and Parks
MWh	Megawatt-hour(s)
NAAQS	National Ambient Air Quality Standards
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PM_{10}	Particulate Matter (10 micrometers or less)
PWS	Public Water Supply
RIB(s)	Rapid Infiltration Basin(s)
SHPO	Montana State Historic Preservation Office
STEP	Septic Tank Effluent Pump
SWPPP	Stormwater Pollution Prevention Plan
TN	Total Nitrogen
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
UV	Ultraviolet (Light)
WWTF	Wastewater Treatment Facility

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1. Overview of Proposed Action

1.1 Authorizing Action

In accordance with the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state action that may have an impact on the environment. The Proposed Action, described in Section 1.3 below, is considered a state action that may have an impact on Montana's environment and, therefore, the Department of Environmental Quality (DEQ) has prepared an environmental review. This Environmental Assessment (EA) examines the proposed action and alternatives to the proposed action and discloses 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 significance criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

1.2 Description of DEQ Regulatory Oversight

1.2.a Sanitation in Subdivisions Act

DEQ administers the Sanitation in Subdivisions Act, overseeing the design and development of subdivisions and their associated facilities. Its responsibilities include regulating water supply, sewage disposal, and the potability of public and domestic water supplies, as well as protecting water quality for other beneficial uses (76-4-101, et seq., Montana Code Annotated (MCA)).

1.2.b Montana Public Water Supplies, Distribution, and Treatment Laws

DEQ implements the Public Water Supplies, Distribution, and Treatment Laws, reviewing public water and wastewater systems pursuant to 75-6-101, et. seq., MCA. Rules promulgated pursuant to the Laws are adopted in ARM Title 17, Chapter 38, Sub-chapter 1. Circular DEQ-2: *Design Standards for Public Sewage Systems* is adopted and incorporated by reference into ARM 17.38.101 (22), and imposes design requirements for wastewater treatment systems, known as Facility Plans.

1.2.c. Montana Water Quality Act

DEQ administers the Montana Water Quality Act, issuing Montana Ground Water Pollutant Control System (MGWPCS) discharge permits pursuant to 75-5-4, et seq., MCA. Regulations governing MGWPCS permitting are codified at ARM Title 17, Chapter 30, Sub-chapter 10.

1.3 Proposed Action

The Proposed Action is for DEQ to issue a plan approval under Circular DEQ-2 for a new wastewater treatment facility (WWTF) to serve the initial phase of the Blackfoot Crossing development. The plan approval would allow construction of the WWTF in accordance with the approved facility plan and conditions of approval.

The proposed WWTF would provide centralized treatment for wastewater generated within the Blackfoot Crossing development and would employ a treatment system consisting of flow equalization, influent screening, and a membrane bioreactor (MBR) treatment and filtration system, followed by a woodchip bioreactor for polishing and ultraviolet light disinfection. This treatment train is designed to produce a high-quality effluent that meets applicable state water quality standards and nondegradation requirements before final subsurface disposal. Treated effluent would be disposed of in an on-site rapid infiltration basin system.

DEQ's action on this facility plan is limited to review and approval under Circular DEQ-2. If DEQ determines that the facility plan meets Circular DEQ-2 requirements, DEQ would issue a plan approval authorizing construction of the WWTF, subject to compliance with all approval conditions. Allowable effluent concentrations and loading rates for the facility are evaluated under applicable water quality standards and nondegradation criteria (including Circular DEQ-7), and the WWTF has been designed based on those criteria to protect state waters.

This EA evaluates the direct, secondary and cumulative impacts related to the first phase of the WWTF (Phase 1), which would include construction and operation of a new on-site wastewater treatment facility near Milltown, Montana. Phase 1 is designed for a maximum daily flow of 20,000 gallons per day, with expected effluent concentrations of less than 10 mg/L biochemical oxygen demand (BOD) and 5 mg/L total nitrogen (TN). There are no concurrent DEQ permitting actions for this WWTF currently under review. Any subsequent expansion of the WWTF or associated collection system to serve additional phases of the Blackfoot Crossing development would be subject to separate permitting decisions and, as appropriate, additional environmental review under MEPA.

ARM 17.30.1022(4)(d) states that public systems that are reviewed by the department after March 1, 2024, under Title 75, chapter 6, MCA, and ARM 17.38.101, under a common design plan or serving a common development, that in the aggregate discharge less than one pound of total nitrogen per day are not subject to Montana Ground Water Pollution Control System (MGWPCS) permit requirements. Based on the Phase 1 design flow and anticipated effluent total nitrogen concentration documented in the facility plan, the projected total nitrogen discharge from the WWTF is less than one pound per day. Accordingly, the proposed WWTF, as designed for Phase 1, is not subject to MGWPCS permitting requirements. If future phases of

the development or modifications to the WWTF increase total nitrogen loading such that the aggregate discharge equals or exceeds one pound per day, MGWPCS permitting requirements could be triggered and additional DEQ review would be required at that time.

DEQ's plan approval, when issued, will include conditions requiring installation and monitoring of two groundwater monitoring wells: one upgradient of the rapid infiltration basins to establish background groundwater quality, and one downgradient at or near the end of the 500-foot groundwater mixing zone to monitor compliance with groundwater standards and nondegradation trigger values. The approval will specify monitoring parameters (including nitrate), sampling frequency, and reporting requirements to verify that the WWTF operates as designed and that groundwater quality remains protective of beneficial uses.

No wastewater treatment systems currently exist on the project site. The surrounding area is primarily served by individual septic systems and private wells for existing residences. Municipal sewer service from the City of Missoula is not available in this area, and no large-scale wastewater treatment facilities are located nearby. The WWTF would therefore provide new centralized wastewater service to the Blackfoot Crossing development in an area that does not currently have municipal sewer.

The information presented in this EA is based on the Facility Plan application, engineering plans, discussions with the applicant, analysis of aerial photography and topographic maps, and other relevant resources. A complete list of References consulted for this EA is provided in Section 7.

Table 1. Summary of Proposed Action

Proposed Action	
General Overview	The proposed action for the Blackfoot Crossing development would be to construct a new on-site wastewater treatment facility to serve future businesses and residents near Milltown, Montana. The treatment and disposal facilities are located on an area of approximately 1.5 acres. The facility would incorporate flow equalization, influent screening, a membrane bioreactor (MBR) treatment and filtration system, a woodchip bioreactor polishing unit, and ultraviolet light disinfection to reduce effluent concentrations below regulatory limits, followed by rapid infiltration basin system for final disposal. The Proposed Action would require construction of three rapid infiltration basins to collect and treat wastewater. Two monitoring wells would be installed to monitor compliance with groundwater standards and nondegradation trigger values. There are no existing wastewater treatment systems onsite, nor are there any located nearby. Existing homes in the

	surrounding area rely on individual septic systems and private wells. Area well logs indicate the presence of groundwater at depths ranging from 40 to 90 feet within the analysis area, and the Blackfoot River is located approximately 300 feet south of the Proposed Action site with groundwater flow moving Northwest, away from the River.

Duration	Construction of the WWTF is anticipated to take up to six months, with approximately 30 trips/week needed to complete construction. Facility startup is expected to last another six months, with approximately 2 weeks where 3 people are on site 5–7 days/week, and for the remaining startup time, approximately 1 person on site daily. Following construction and startup, ongoing operation and maintenance would be necessary for the life of the WWTF.
Estimated Disturbance	The estimated disturbance area to prepare the site and construct the WWTF, including: clearing vegetation; excavation for below grade tanks; construction of tanks; installation of below grade piping; construction of an above grade building to house treatment components, and; excavation for construction and installation of three rapid infiltration basins and components will equate to approximately 1.5 acres of disturbance to the land surface and approximately 2,260 cubic yards of excavated and regraded soil.
Construction Equipment	Bulldozer, Mini Skid Steer, Front End Loader, Small Excavator, Concrete Truck, Drill Rig, and other typical civil construction equipment.
Personnel Onsite	***Construction:*** approximately 30 vehicle trips/week for 6 months, with 1-2 workers per vehicle, and workers on site for approximately 8 hours/day, 5 days/week. ***Startup:*** approximately 3 people on site 5–7 days/week with 3 vehicles (including a small crane/lift truck) for approximately 2 weeks, then approximately 1 person and 1 vehicle daily for the remainder of the startup period. ***Operation:*** One part-time operator would be present regularly at the WWTF.
Location and Analysis Area	***Location:*** Cowboy Trail, Milltown, MT 59851 Latitude: 46.8755250° Longitude: -113.8820139°

	Analysis Area: The area being analyzed as part of this environmental review includes the immediate project area (Figure 1), as well as neighboring lands surrounding the analysis area, as reasonable and appropriate for the impacts being considered.
The applicant is required to comply with all applicable local, state, and federal requirements pertaining to the following resource areas:	
Air Quality (Section 2.3)	Construction would generate short-term exhaust from worker vehicles and heavy equipment and fugitive dust from excavation, grading, and soil handling. Approximately 30 worker trips per week (about 1-2 workers per vehicle) are expected for six months, plus occasional equipment deliveries, with standard dust-control and stormwater BMPs implemented. During operation, only minor traffic (about two trips per week) and small building mechanical loads would occur. The project area is located within the Missoula PM_{10} and CO maintenance area. The proposed WWTF is not expected to interfere with maintenance of those standards. Air quality impacts, including construction-related dust, are expected to be minor and not significant.
Water Quality (Section 2.2)	The applicant proposes to minimize impacts to water quality. No flood plain or surface water are present within the Proposed Action area as demonstrated through the FEMA Flood Map Service Center and as surveyed by the WGM Group. The Project is not proposed to be in any wetlands (Montana Wetland and Riparian Framework Layer) and the Storm Water Pollution Prevention Plan (SWPPP) mitigations would minimize any sediment and erosion related impacts to surface water during construction. Area well logs indicate the presence of groundwater at depths ranging from 40 to 90 feet, moving northwest, away from the Blackfoot River. The Blackfoot River is located approximately 300 feet to the south of the project site. The stream terrace setting of the property at the base of Woody Mountain provides a buffer between the WWTF and water resources (WGM Group). Treated effluent from the MBR and polishing units would be discharged to on-site rapid infiltration basins. A nondegradation analysis using design flow and effluent quality shows that nitrate and other constituents remain below trigger values and groundwater standards at compliance points. Phase 1 total nitrogen loading is projected to be less than one pound per

	day, so the facility is not subject to MGWPCS permitting under ARM 17.30.1022(4)(d). Water quality would continue to be monitored as an approval condition. Water-quality impacts are expected to be minor and not significant.
Soils, Vegetation, Erosion Control and Sediment Transport (Sections 2.1 and 2.4)	The applicant proposes to reduce erosion and sediment transport. Because the Proposed Action involves disturbing soil and total disturbance is ≥1 acre, the applicant would be required to obtain a MPDES General Permit for Storm Water Discharges Associated with Construction Activity (MTR100000). That permit requires a Storm Water Pollution Prevention Plan (SWPPP) with erosion and sediment controls (silt fence, stabilized entrances, mulching, etc.). Construction would disturb about 1.5 acres of existing disturbed ground with sparse grasses. Disturbed areas would be promptly reseeded with an appropriate weed-free mix to re-establish perennial cover and reduce noxious weed risk, consistent with county and state weed-control requirements. Vegetation impacts are expected to be negligible and short-term.
Terrestrial, Avian, and Aquatic Life (Section 2.5)	The WWTF site is a previously disturbed industrial area lacking wetlands or intact native habitat. Although several listed and sensitive species occur in the broader region, no suitable habitat or occurrences are documented within the WWTF footprint, and the site is outside designated sage-grouse habitat. The subsurface discharge is not expected to affect nearby surface waters that support aquatic species. Impacts to wildlife and habitats are expected to be negligible.
Cultural Resources (Section 2.6)	A Class III cultural resource survey completed by Western Cultural Inc. identified two historic trash scatters and one isolated can scatter, all recommended as not eligible for the NRHP. No NRHP-eligible historic properties were identified within the WWTF footprint, and industrial remnants from the former log yard are not recommended as eligible resources. If previously unknown cultural materials are discovered during construction, work would stop and SHPO would be consulted. No significant impacts to cultural resources are expected.
Socioeconomics (Section 2.9)	The WWTF would create several temporary construction jobs and at least one part-time operational position. Construction traffic is expected to average about 30 trips per week for six months (plus short-term startup activity with up to three

	vehicles per day for roughly two weeks). Long-term WWTF traffic would be about two trips per week. Socioeconomic effects from the WWTF itself are negligible; broader development-related effects are addressed in separate county processes.
Demands on Land, Water, Air or Energy (Section 2.7)	The WWTF would use about 1.5 acres of private land and modest amounts of construction materials and electricity. Aeration blowers, pumps, and controls would require tens of kilowatts of electrical capacity, with total plant energy use on the order of tens of megawatt-hours per year, a very small fraction of local utility demand. No major adjacent industrial uses would combine to create significant resource demands.
Solid Waste and Hazardous Substances	The WWTF would include a waste-activated sludge tank that discharges to a project-supplied solids tank, which would be periodically pumped out by a licensed pumper for off-site disposal. Pumped sludge is anticipated to be disposed of at an approved land application site, which would be required to comply with all applicable local, state and federal regulations for land application. No hazardous waste would be discharged by the WWTF.

Cumulative Impacts Considerations	
Past Actions	No WWTF currently exists on site. Residents in the surrounding area are currently served by on-site individual septic tanks and wells.
Present Actions	Blackfoot Crossing has proposed to construct a wastewater treatment facility (WWTF) within the development, to be built in phases. Phase I would provide treatment capacity for 20,000 gallons per day (gpd). A daily flow of 20,000 gallons would be the requested design flow for approval.
Related Future Actions	Two new public water supply wells near the base of the hillside on the eastern portion of the property have been reviewed and approved by DEQ and will be drilled and tested in the winter or spring of 2026.

1.4 Purpose, Need and Benefits

Agency's Purpose, Need and Benefits

The need for the proposed action arises from statutory and regulatory requirements that new public wastewater treatment facilities obtain DEQ review and approval under Circular DEQ-2 before construction. Under the Montana Public Water Supplies, Treatment, and Distributions Laws (Title 75, chapter 6, MCA), ARM 17.38.101, and Circular DEQ-2, DEQ must review and act on facility plans for public sewage systems to ensure that proposed designs are protective of public health and state waters. The applicant has submitted a DEQ-2 facility plan for a new wastewater treatment facility (WWTF) to serve the Blackfoot Crossing development, with major components including screening, biological treatment, filtration, disinfection, and a rapid infiltration basin system. DEQ must decide whether to approve the facility plan and authorize construction of the WWTF, subject to applicable conditions, to ensure the proposed system is properly designed to protect public health and state waters.

Applicant's Purpose, Need and Benefits

The applicant's purpose in seeking DEQ-2 facility plan approval is to construct a centralized WWTF to provide reliable wastewater treatment and subsurface disposal for the Blackfoot Crossing development in an area without municipal sewer service. The WWTF is intended to replace reliance on multiple individual onsite systems with a single, advanced treatment system that can meet applicable water quality and nondegradation requirements, thereby protecting groundwater and nearby surface waters while supporting the planned commercial and residential uses of the site as those are permitted and constructed.

Under the applicant's concept, treated wastewater would be generated by collection systems serving existing and future development within Blackfoot Crossing. For the initial phase, wastewater from the existing commercial lots would be collected by individual septic tank effluent pump (STEP) systems and conveyed via force mains to the WWTF.

At the WWTF, collected wastewater would undergo flow equalization, screening, and treatment through the membrane bioreactor (MBR) and woodchip bioreactor system, followed by ultraviolet disinfection. The applicant's objective is to produce a high-quality effluent that meets applicable water quality and nondegradation requirements so that it can be disposed of through the on-site rapid infiltration basin system without causing degradation of groundwater.

Scope of this EA

This Environmental Assessment addresses DEQ's decision on the DEQ-2 facility plan for the WWTF and the associated treatment and disposal system. The broader Blackfoot Crossing development, including build-out of the collection system and future phases of commercial and

residential construction, will be or has been reviewed under separate land-use, subdivision, and permitting processes.

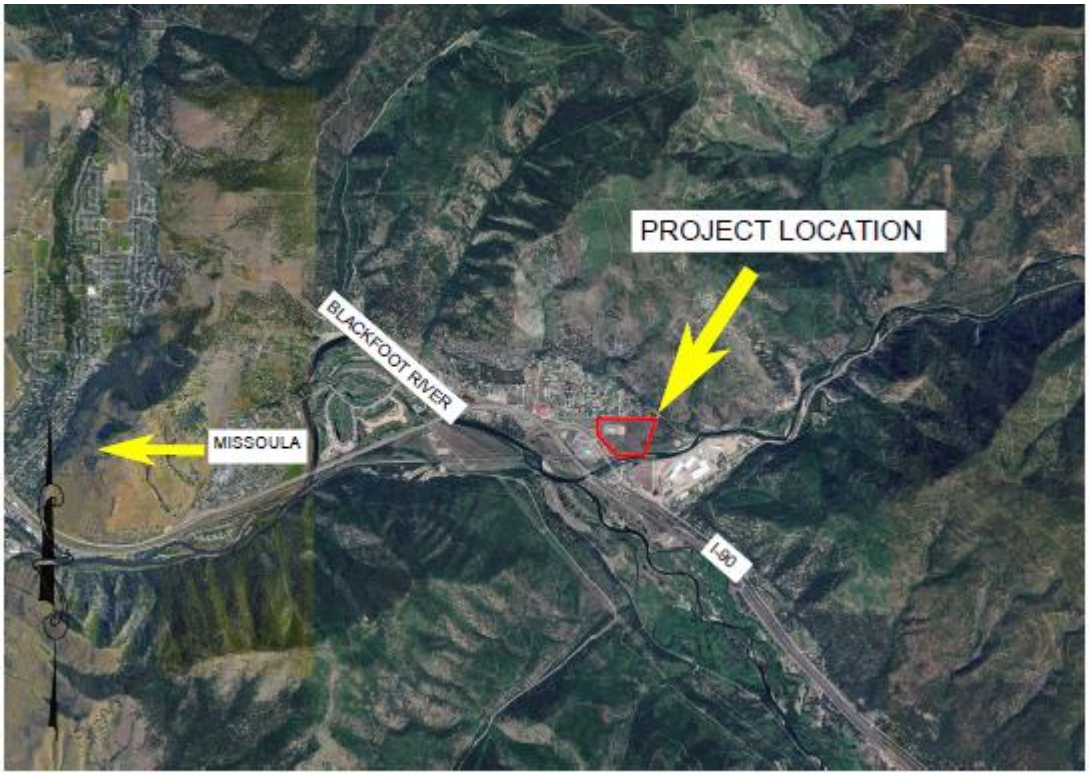

Figure 1. General Location of the Proposed Project

Figure 2. General Site Layout

1.5 Other Governmental Agencies and Programs with Jurisdiction

The proposed action would be located on private land. All applicable local, state, and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency

jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: Montana Department of Natural Resources, Montana Department of Fish Wildlife and Parks, U.S. Fish and Wildlife Service, U.S Army Corps of Engineers, and Missoula County.

2. Evaluation of Affected Environment and Impact by Resource

The impact analysis will identify and estimate whether there are direct, secondary, and cumulative impacts to the resource areas described in ARM 17.4.609. 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)). Cumulative impacts are the collective impacts on Montana's environment of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location or generic type. (ARM 17.4.603(7)). Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures. Under 75-1-220(10)(b)(i), MCA, MEPA review excludes upstream, downstream, or other indirect impacts that would happen independently or would be caused by other actions not within DEQ's regulatory control.

Impacts will be described in this analysis wherever they are expected to occur. Projects identified in Table 1 have been included in the cumulative impacts assessment for each resource.

For each of the resource areas analyzed in this EA, DEQ also determines whether impacts to those resource areas are considered significant impacts that would require preparation of a more detailed analysis. To better describe impact intensity, DEQ uses the following classifications:

- No impact: No change from existing conditions.
- Negligible: An adverse or beneficial effect would occur but at the lowest level of detection.
- Minor: A noticeable effect that is small in scale and does not affect the function or integrity of the resource.
- Moderate: A clearly identifiable effect that changes the function or integrity of the resource.
- Major: An effect that fundamentally alters the resource.

2.1 Geology and Soil Quality, Stability, and Moisture

The treatment and disposal facilities are located on an area of approximately 1.5 acres. In March of 2022, Tetra Tech performed a geotechnical investigation for the project site on behalf of the applicant. The investigation included thirty (30) test pits across the proposed site location. Topsoil was present in 26 of the test pits, extending from 0.5 to 2.5 feet below the ground surface. Native gravel was encountered beneath the topsoil and fill in all borings, extending to the maximum explored depth of 10 feet. This material was visually classified as poorly graded gravel with silt and sand, containing cobbles and boulders of varying sizes in accordance with typical industry practices (i.e., ASTM D2488 guidelines for the visual-manual identification and description of soils for engineering purposes). The native alluvial gravel exhibited loose to very loose consistency. Groundwater was not encountered during excavation in March 2022; however, evidence indicating the presence of seasonal groundwater was observed on native gravel, cobbles, and boulders in all test pits beginning between depths of 5 and 9 feet, continuing to the maximum depth explored (10 feet). The site is not located within mapped fractured bedrock or karst formations, and no unusual or unstable geologic features have been identified that would affect facility construction or operation.

The WWTF site is described as “previously disturbed” because the specific area where the facility would be located has a long, well-documented history of industrial use and ground disturbance, rather than being native or undisturbed land. Based on the Phase I Environmental Site Assessment (ESA), the earliest documented disturbance occurred between approximately 1911 and 1931, when this portion of the property was occupied by the Western Lumber Company sawmill (later operated by the Anaconda Company), which involved clearing, grading, and other industrial activities typical of early 20th-century lumber operations. After the mill closed, the WWTF-area portion of the site appears to have been intermittently used for log storage associated with the Bonner Mill beginning in the mid-1980s, with evidence of surface disturbance visible in historical aerial imagery by 1984 and more pronounced activity by 1995, when portions of the site were used for log yard waste handling and landfill operations. No permanent buildings are currently present within the WWTF footprint, and available records and site imagery indicate no historic permanent structures within this specific area aside from temporary industrial uses and material stockpiling. Historical aerial photographs in the Phase I ESA visually corroborate this progression, supporting the conclusion that the WWTF location has been repeatedly disturbed for decades and is not a greenfield site.

Direct Impacts

Soil moisture directly under the rapid infiltration system would increase as a result of the treated effluent infiltrating into the subsurface. Approximately 2,260 cubic yards of soil within the project area would be excavated for construction, then replaced and regraded on the site.

Some soil would be permanently excavated to establish areas for the treatment tanks and disposal basins, and that soil would also be used to replace and regrade excavated areas. Other than pickup trucks used by construction workers, larger construction equipment would be present on site during the site civil portion of the project, estimated to last 1–2 months. Equipment is expected to include a bulldozer, mini skid steer, front-end loader, small excavator, concrete truck, and similar civil construction machinery. These items would typically be delivered to the site once and removed once at the end of their use, resulting in minimal additional traffic. In order to mitigate soil and moisture losses and provide adequate soil stabilization, the site would be revegetated after construction.

Minor, not significant short-term impacts to soil quality and stability would be anticipated from excavation and grading during construction and would be mitigated by replacing soil, regrading disturbed areas, and revegetating the site to reduce erosion. Implementation of SWPPP erosion and sediment control BMPs (see Section 2.2) will help maintain soil stability and minimize off-site transport of disturbed soils during construction. Minor, not significant long-term impacts to soil moisture would be anticipated from treated effluent entering the subsurface during operation of the rapid infiltration system. Due to the depth of the rapid infiltration basins (approximately four feet below the natural ground surface) and the sandy/rocky composition of the surrounding soils, treated effluent containing low levels of nitrogen is expected to percolate vertically to groundwater and then move laterally within the alluvial aquifer; no visual surface evidence of increased soil moisture is anticipated.

Secondary Impacts

Secondary impacts to geology and soil quality, stability, and moisture would be minor and not significant. All excavated soil would be replaced and regraded to the original slope, thereby minimizing geologic instability. The WWTF would not alter regional geologic conditions or contribute to slope failure or subsidence beyond the localized effects described above.

Cumulative Impacts

Cumulative impacts to geology and soil quality, stability, and moisture are not anticipated from the development of Blackfoot Crossing's WWTF and there are no other similar actions by location or generic type that would contribute to geology or soil impacts from this proposed action.

2.2 Water Quality, Quantity, and Distribution

Area well logs indicate the presence of groundwater at depths ranging from 40 to 90 feet. The Blackfoot River is located approximately 300 feet to the south of the project site. A non-degradation analysis was prepared by the applicant's consultants, WGM Group, demonstrating

that the effluent from the proposed treatment facility would not have a significant impact on groundwater. The analysis, together with hydrogeologic studies completed by WGM Group, also shows that groundwater underlying the site flows northwest, away from the Blackfoot River, and demonstrates that effluent from the WWTF would not infiltrate nearby surface water. WGM Group also found that the stream terrace setting of the Subject Property at the base of Woody Mountain provides a buffer between the WWTF and water resources. Regional data for the Hellgate Valley aquifer documents that the water table and the Blackfoot River would not intersect the critical depth of effluent, 18 ft bgs.

The 100-year FEMA Floodplain for the Blackfoot River was surveyed by WGM Group, and DEQ consulted the FEMA Flood Map and DEQ's GiS layers. The southern boundary of Lot 23 is located approximately 180 feet from the edge of the mapped floodplain. The proposed development of the WWTF is located outside the currently adopted regulatory floodplain and all treatment works structures are proposed above the 100-year floodplain elevation.

Direct Impacts

Blackfoot Crossing WWTF would be served by a groundwater system that is not hydraulically connected to surface water. The Blackfoot River lies directly south of the property but would not be impacted by the proposed project due to the use of a rapid infiltration basin system for effluent disposal. The rapid infiltration basin system disposal method eliminates the potential for direct discharge to surface waters, so surface water discharge permitting requirements, such as MPDES outfall permitting, would not be applicable at the WWTF project site. Surface water quality considerations are addressed through the groundwater nondegradation and Clark Fork River trigger-value analyses described below. To summarize those trigger-value analyses, because measurement and triangulation of the hydraulic gradient of the underlying shallow aquifer indicates that groundwater flow is generally to the northwest and away from the Blackfoot River, it is not anticipated that the proposed action would have any direct impact to the River.

Process and design spreadsheet and performance data from comparable facilities were provided to DEQ by the applicant's development team, demonstrating that the proposed system has sufficient organic and nutrient treatment capacity to meet applicable non-degradation standards.

A nondegradation analysis was prepared by Anderson Engineering and Synergy Engineering and Konsulting and provided to DEQ as part of the facility plan to evaluate the effects of the proposed discharge on groundwater quality. The analysis used the design flow, effluent concentrations, and site-specific hydrogeologic information to estimate nitrate and other parameter concentrations at points of compliance in the underlying aquifer. Modeled nitrate

concentrations remained below nondegradation trigger values and the 10 mg/L groundwater standard at the downgradient end of the 500-foot- long groundwater mixing zone, indicating that the proposed rapid infiltration system, as designed, would not cause degradation of groundwater quality or exceed applicable standards. The operator anticipates a startup period of approximately six months to fully establish biological treatment and achieve stable effluent quality.

The nondegradation analysis established background groundwater nitrate concentration using a water sample collected from a nearby downgradient well in December 2025, which indicated a nitrate concentration of 0.07 mg/L, well below the 10 mg/L Montana groundwater standard. Using this background concentration, site-specific hydrogeologic data, the Phase 1 design flow, and anticipated effluent total nitrogen concentration, the analysis modeled nitrate concentrations at the downgradient compliance point (500-foot mixing zone boundary) and found that predicted concentrations would remain below applicable nondegradation trigger values and the groundwater standard.

The Clark Fork River lies approximately 1.8 miles from the site in the direction of groundwater flow. Conservatively accounting for the potential that the groundwater flow path trends more directly toward the Clark Fork River as it approaches the river, DEQ estimates the distance from the rapid infiltration basins to the Clark Fork River along the groundwater flow path to be approximately 5,000 feet. Because this distance exceeds the half-mile threshold established under ARM 17.30.715 and Circular DEQ-7 at which a surface water trigger analysis would be required, a formal trigger analysis for the Clark Fork River was not required for this project.

Nevertheless, in response to public comment expressing concern that groundwater from the project area could eventually discharge to the Clark Fork River downstream of the Blackfoot–Clark Fork confluence, DEQ performed surface water trigger-value calculations consistent with ARM 17.30.715 and Circular DEQ-7. That analysis determined that the incremental contribution to Clark Fork River nitrate concentration from the Phase 1 discharge would be well below the applicable surface water trigger value and is therefore considered insignificant. Accordingly, DEQ concludes that direct impacts to the Clark Fork River from the proposed Phase 1 discharge are not significant.

Construction-related disturbances are anticipated to take place on approximately 1.5 acres of land (See Section 2.1), therefore the permittee would be required to obtain coverage under a Montana Pollutant Discharge Elimination System (MPDES) General Permit for Stormwater Discharges Associated with Construction Activity, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) to minimize construction related impacts to water resources. The SWPPP will identify potential sources of stormwater pollution and describe erosion control, sediment control, runoff management, and pollution prevention best management practices

(BMPs) to minimize the discharge of pollutants in stormwater. BMPs will be installed prior to or concurrent with land disturbance, inspected at required intervals and after qualifying storm events, and maintained or modified as necessary. The SWPPP will remain in effect until final stabilization is achieved.

The project will also be implemented in a manner consistent with Missoula County's Small MS4 stormwater management requirements, including construction-site stormwater runoff controls for sites greater than one acre. Example BMPs include:

- Erosion and sediment controls such as silt fence, fiber rolls, sediment traps, and stabilized construction entrances;
- Minimizing disturbed area through phased construction and prompt stabilization;
- Dust control measures such as watering exposed soils and covering stockpiles;
- Temporary seeding, mulching, erosion control blankets, and slope stabilization;
- Sediment controls such as wattles, sediment basins, inlet protection, and check dams; and
- Pollution prevention practices including proper waste disposal, covered material storage, designated concrete washout areas, secondary containment for fuels and chemicals, and spill response procedures.

Because of the closed-loop design of the WWTF, the subsurface disposal method, and the regulatory compliance measures in place, direct impacts to surface water or groundwater resources are anticipated to be negligible. This conclusion reflects the high level of treatment and the fact that Phase 1 will discharge less than one pound of total nitrogen per day to groundwater.

Secondary Impacts

No secondary impacts to state waters from the Proposed Action were identified by DEQ after review of the Application, Research, and other References due to the closed-loop design of the WWTF, subsurface disposal method, and regulatory compliance measures in place.

Cumulative Impacts

Background groundwater nitrate concentration (0.07 mg/L) reflects the cumulative effect of past and present actions in the area, including existing septic systems serving surrounding residences. DEQ's cumulative impact analysis considered the incremental contribution of the Phase 1 WWTF discharge in combination with existing systems. Using conservative assumptions about nearby septic system locations and loading rates, the applicant's consultant evaluated cumulative nitrate concentrations at the nearest downgradient subsurface systems (septic drainfields) and found that the addition of the WWTF discharge would result in a non-significant increase, with cumulative concentrations remaining well below the applicable standards.

Two new public water supply wells are proposed and approved near the base of the hillside on the eastern portion of the property. These wells would be designed and installed in compliance with DEQ public water system requirements. No domestic wells were identified directly downgradient of the WWTF within the 500-foot mixing zone. All discharge and disposal structures would meet or exceed minimum setback requirements from surface waters, floodplains, ditches, and springs.

As stated in Section 1.3, DEQ's MEPA review is scoped to the impacts of the agency action within DEQ's regulatory jurisdiction—here, plan approval of the Phase 1 WWTF under Circular DEQ-2. Under 75-1-220(10)(b)(i), MCA, MEPA review does not extend to upstream, downstream, or other indirect impacts that would occur independently or result from actions outside DEQ's regulatory control. Broader land-use, traffic, and subdivision impacts associated with the Blackfoot Crossing development as a whole are not within the scope of this review; those impacts are addressed through separate Missoula County planning and permitting processes. Any future state approvals for additional phases or expansion of the WWTF would be subject to project-specific MEPA review at the time they are proposed (see responses to comments in Section 8).DEQ concludes that cumulative impacts to water quality, quantity, and distribution from the Phase 1 WWTF, in combination with other past, present, and reasonably foreseeable actions, are not significant.

2.3 Air Quality

The project area near Milltown in Missoula County is located next to the Missoula PM_{10} and CO maintenance area, which is designated attainment for the National Ambient Air Quality Standards (NAAQS), subject to EPA approved maintenance plans, and no Class I airsheds occur in the immediate vicinity. Regional air quality is generally good, with occasional short-term degradation from wood smoke, road dust, and wildfire smoke. (Missoula Public Health, n.d.)

Air quality is regulated under the federal Clean Air Act, the Montana Clean Air Act (Title 75, chapter 2, MCA), and implementing rules in ARM Title 17, chapter 8. For a small facility like the proposed WWTF, no air quality permit is anticipated, but construction and operation must still comply with applicable requirements, including reasonable precautions to control fugitive dust during ground-disturbing activities.

Direct Impacts

Impacts on air quality resulting from the proposed WWTF would be short-term during construction activities. Construction-related impacts to air quality include temporary engine exhaust from construction equipment (including a bulldozer, mini skid steer, front-end loader, small excavator, concrete truck, and similar machinery) and fugitive dust from disturbance of the site soil during excavation of approximately 2,260 cubic yards of soil; soil replacement and

regrading; construction of surface buildings to house WWTF components, and; installation of subsurface WWTF components. These short-term impacts are expected to be minor, not significant, and temporary in nature, with engine exhaust from construction equipment and dust creation only during construction of the WWTF. Dust control BMPs (e.g., watering exposed soils and controlling vehicle speeds on unpaved surfaces) implemented under the SWPPP and Missoula County MS4 requirements will further minimize fugitive dust emissions during construction.

During the estimated six-month construction period, approximately 30 worker vehicle trips per week (averaging 1-2 workers per vehicle) and occasional deliveries will occur, with workers typically present on site 8 hours per day, 5 days per week. These traffic levels represent a very small increment to existing background traffic and associated exhaust emissions. Impacts would be limited in duration and extent and mitigated through implementation of construction best management practices, including dust control and compliance with applicable air quality and stormwater permits.

During the startup period, up to three vehicles per day (including one small crane or lift truck) may be present on site for 5–7 days per week over roughly two weeks, after which staffing and vehicle trips would decline to the long-term average of about two trips per week. These operational traffic levels represent a minor source of vehicle exhaust.

Negligible impacts to air quality were Identified by DEQ after review of the Application, Research, and other References based on the small construction footprint, short construction duration, and implementation of fugitive dust controls. Following construction and during startup and operation of the WWTF, impacts to air quality would be negligible. The facility would generate occasional vehicle trips for maintenance and sludge removal, which would represent a negligible increment to existing ambient air conditions in the attainment/Class II area (see Secondary Impacts below).

Secondary Impacts

The use of a membrane bioreactor (MBR) in conjunction with a rapid infiltration basin system minimizes potential odors and air quality concerns, enhancing the facility's compatibility with existing and surrounding land uses. The WWTF would utilize vaulted underground tanks and enclosed filtration equipment within a designated building to further reduce potential air quality impacts and protect system components. Additionally, the inclusion of an aeration tank provides enhanced odor control. The proposed WWTF is small and, with construction dust controls and minor operational traffic, is not expected to interfere with maintenance of PM_{10} or CO standards in the area; therefore, secondary operational air quality impacts are anticipated to be negligible.

Cumulative Impacts

Cumulative air quality impacts are anticipated to be minor and not significant. Construction activities would be temporary and subject to dust control measures. Operational emissions from the WWTF would represent a small increment to existing baseline air quality in the attainment area and would not cause or contribute to exceedance of NAAQS or regional haze standards.

2.4 Vegetation Cover, Quantity, and Quality

Historically, the subject property has been used exclusively for industrial and commercial purposes, with no agricultural use. The facility would be constructed on currently undeveloped and previously disturbed land, within an area zoned for industrial use. Current vegetative cover includes sparse native grasses. Based on a search of the Montana Natural Heritage Database, there are no plant species listed as either S1 (at high risk), S2 (at risk), LE (listed endangered), or LT (listed threatened) within the immediate vicinity of the proposed facility. (Montana Natural Heritage Database, n.d.).

Direct Impacts

Construction of the facility would disturb approximately 1.5 acres of the site; following construction, disturbed areas not covered with new surface facilities would be promptly reseeded with an appropriate, weed-free seed mix to establish perennial vegetation and reduce the potential for noxious weed establishment. Vegetation would likely be reestablished within a year. Minor, and not significant, short-term impacts to vegetation cover, quantity and quality were identified by DEQ after and in-depth review of the Application, Research, and other References due to temporary disturbance of a small area of vegetative cover followed by prompt reseeding.

Secondary Impacts

The approximate 1.5 acres of ground disturbance could introduce weeds into this area. To address this potential, the applicant would be required to implement noxious weed prevention and control measures consistent with the Montana County Weed Control Act (Title 7, chapter 22, part 21, MCA) and Missoula County Weed District guidance, including monitoring disturbed areas, spot-treating weed infestations, and coordinating with the County Weed District as needed. Negligible secondary impacts to vegetation would be anticipated because successful revegetation with a perennial mix and treatment of weeds would reduce this potential impact.

Cumulative Impacts

Cumulative impacts to vegetation cover, quantity, and quality are not anticipated from the development of Blackfoot Crossing's WWTF, provided disturbed areas would be revegetated and noxious weeds controlled pursuant to applicable county and state weed-management requirements.

2.5 Terrestrial, Avian, and Aquatic Life and Habitats

The WWTF footprint lies within an area that has been repeatedly disturbed by historical sawmill and log-yard activities since at least the early 20th century (see Section 2.1). As a result, current conditions consist of disturbed upland with sparse grasses and industrial remnants rather than intact native habitats, and a review of available mapping and site conditions indicates no wetlands or aquatic habitats occur on the proposed WWTF site.

Based on a search of the Natural Heritage Database (Montana Natural Heritage Database, n.d.) the following species have documented occurrences in the broader project vicinity, but none have been observed or documented on the WWTF project site itself:

Federally Listed Threatened Species

- Bull Trout
- Canada Lynx
- Grizzly Bear

S1 (at high risk) – Critically Imperiled

- Millipedes (Austrotyla montani and Corypus cochlearis)

S2 (at risk) – Imperiled

- Westslope Cutthroat Trout
- Lewis's Woodpecker
- Western Pearl Mussel

DEQ referred to the Montana Sage Grouse Habitat Conservation Map and determined the project site is not listed as being located within designated Sage Grouse habitat (core, general, or connectivity); therefore, no consultation under the Montana Sage Grouse Executive Order is required for this project location. (Montana Sage Grouse Habitat Conservation Program, n.d.). If there are questions about Sage Grouse at this site, the applicant must contact and consult with the Sage Grouse Habitat Conservation Program at: https://sagegrouse.mt.gov/.

The 100-year FEMA Floodplain for the Blackfoot River was surveyed by WGM on behalf of the applicant. The southern boundary of Lot 23 is located approximately 180 feet from the edge of

the mapped floodplain. The proposed development of the WWTF is located outside the currently adopted regulatory floodplain and all treatment works structures are proposed above the 100-year floodplain elevation.

Direct Impacts

None of the above listed species have been observed or documented on the WWTF project site. Due to the Proposed Action being developed in an existing industrial and commercial area that is already disturbed, construction and operation of the WWTF are not expected to remove native habitats or displace wildlife beyond existing conditions. No significant direct impacts to terrestrial, avian or aquatic life and habitats were identified by DEQ after review of the application and available resource data.

Secondary Impacts

Significant secondary impacts to terrestrial, avian, and aquatic life and habitats are not anticipated from the development of Blackfoot Crossing's WWTF. The facility is not expected to increase human access to undisturbed habitats, alter nearby surface waters, or measurably change habitat beyond the existing industrial context.

Cumulative Impacts

Significant cumulative impacts to terrestrial, avian, and aquatic life and habitats are not anticipated from the development of Blackfoot Crossing's WWTF. Given the small project footprint, previously disturbed setting, absence of mapped sage grouse habitat and onsite wetlands, and lack of suitable habitat for the listed species on the WWTF site itself, the project would not measurably contribute to cumulative habitat loss or degradation in the area.

2.6 History, Culture, and Archeologic Uniqueness

Western Cultural Inc. prepared a cultural resource survey for the applicant. The methodology included a pedestrian survey of 50 acres to assess the potential for surface archaeological deposits or features at the proposed location. The investigation identified two new cultural resources and one isolated find. Sites 24MO1996 and 24MO1997—both historic trash scatters—are recommended as Not Eligible for the National Register of Historic Places (NRHP). IF-JV-1, a small can scatter, is also recommended as Not Eligible for the NRHP, as it meets the definition of an isolated find under the Montana State Historic Preservation Office (SHPO) guidance. (Montana State Historic Preservation Office, 2024)

Throughout the project area, numerous earthworks (berms, stone piles, bulldozer scars, etc.) as well as various metal scraps and machinery parts were observed. These features are remnants of the former commercial West Bonner Log Yard (see Section 2.1). While these items were not

formally recorded, they were documented with photographs and UTM coordinates and are not recommended as eligible historic properties.

Direct Impacts

As indicated by the Montana Cultural Resource Database search conducted by Western Cultural Inc., no NRHP-eligible historic properties are present within the WWTF project footprint. Disturbance associated with construction of the WWTF would therefore not adversely affect any known eligible historic, cultural, or archaeological resources. No direct impacts to history, culture, and archeologic uniqueness were identified.

If previously unknown cultural or paleontological materials are discovered during construction, work in the immediate area would be halted and the appropriate authorities, including DEQ and SHPO, would be notified so that the finds can be evaluated and appropriate measures taken.

Secondary Impacts

Secondary impacts to history, culture, and archaeologic uniqueness are not anticipated with the development of Blackfoot Crossing's WWTF. The project would not change access patterns to known cultural sites or introduce new uses that would indirectly affect historic properties. No secondary impacts to history, culture, and archeologic uniqueness are anticipated.

Cumulative Impacts

Cumulative impacts to history, culture, and archeologic uniqueness are not anticipated with the development of Blackfoot Crossing's WWTF. Given the previously disturbed industrial setting and absence of NRHP-eligible properties within the project footprint, the WWTF would not measurably contribute to cumulative loss or degradation of cultural resources in the area.

2.7 Demands on Environmental Resources of Land, Water, Air or Energy

The project would occur on private land. The proposed WWTF would require energy to operate; however, the facility would use standard electrical service and energy-efficient equipment and system automation to limit energy consumption. No other major industrial or commercial activities are located nearby that would substantially affect combined demands on land, water, air or energy resources.

Direct Impacts

Construction and operation of the WWTF would use a small amount of land (approximately 1.5 acres) within an existing industrial and commercial area, modest quantities of construction materials, and electricity for pumps (to transport wastewater within the WWTF), aeration

blowers (to provide oxygen to water basins), controls, and lighting. Across many WWTFs, aeration is the single largest electrical load in wastewater treatment, often exceeding 50% of total energy consumption (Pawel Krzeminski, 2012). However, the specific energy consumption of an MBR system is dependent on many factors, such as system design and layout, volume of treated flow, membrane utilization and operational strategy. Negligible direct impacts to environmental resources of land, water, air or energy were Identified by DEQ after review of the Application, Research, and other References.

Secondary Impacts

No secondary impacts to environmental resources of land, water, air, or energy are anticipated for the development of Blackfoot Crossing's WWTF. The WWTF would not materially change regional demand for construction materials, fuels, or electricity.

Cumulative Impacts

The proposed development includes two new public wells that would serve the entire 107-acre development once those plans are approved and implemented. These wells are outside the scope of the Proposed Action for analysis in this EA but were considered for the cumulative impact analysis. Operation of the WWTF, in combination with water supply for the larger development, is not expected to result in measurable depletion of local land, water, air, or energy resources beyond levels evaluated in the applicable subdivision and water-supply reviews. No cumulative impacts to environmental resources of land, water, air, or energy are anticipated for the development of Blackfoot Crossing's WWTF.

2.8 Human Health and Safety

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with construction and operation of wastewater treatment facilities. Access to the facility would be controlled, and few, if any, members of the public would be in immediate proximity to the project during construction or operations.

Direct Impacts

Construction and operation of the WWTF would involve typical occupational risks (equipment operation, excavation, confined spaces, and handling of treatment chemicals) that are addressed through compliance with OSHA standards and employer safety programs. No significant direct impacts were identified by DEQ after review of the Application, Research, and other Government Agency References in development of the permit decision documents.

Secondary Impacts

Significant secondary impacts to health and human safety are not anticipated for the development of Blackfoot Crossing's WWTF. The facility is designed to reliably collect and treat wastewater, which would reduce the potential for public-health risks in the project area.

Cumulative Impacts

Significant cumulative impacts to health and human safety are not anticipated for the development of Blackfoot Crossing's WWTF. When considered with other existing and planned development in the area, the WWTF is expected to improve long-term wastewater management and does not introduce unusual or unmitigated safety risks.

2.9 Socioeconomics

Included in this section are the following: industrial, commercial and agricultural activities and production; quantity and distribution of employment; local and state tax base and tax revenues; demand for government services; locally adopted environmental plans and goals; access to and quality of recreational and wilderness activities; density and distribution of population and housing; social structures and mores; and other appropriate social and economic circumstances.

The project would occur on private land. The WWTF would be maintained for long-term operation and is expected to create several temporary jobs during construction, with the potential for permanent positions related to facility operation and maintenance. The WWTF is a utility component of the larger Blackfoot Crossing mixed-use proposal, which is being reviewed through separate county land-use processes.

The WWTF is designed for a maximum flow rate of 20,000 gallons per day (gpd). For context, the average three-bedroom residence in Montana uses approximately 300 gpd, with an average household size of 2.5 people. Therefore, the WWTF could accommodate on the order of several dozen typical households or equivalent commercial uses; actual population and employment will depend on how the larger development site is ultimately developed under county and state approvals. According to U.S. Census Bureau estimates, Missoula County's population has increased from approximately 109,000 residents in 2010 to more than 120,000 by the early 2020s, reflecting sustained population growth over the past decade. The Blackfoot Crossing development, including the WWTF, would add additional housing and utility capacity that is generally consistent with this ongoing growth trend. (United States Census Bureau, n.d.) All wastewater infrastructure will be constructed in a single phase and designed to accommodate the maximum estimated wastewater demand within the facility's service area.

Direct Impacts

Traffic may increase during the construction of the WWTF and associated discharge structures; however, once construction is complete, traffic would be minimal and limited to routine operation and maintenance activities. DEQ does not anticipate that the project would disrupt native or traditional lifestyles. Construction traffic is expected to average approximately 30 trips per week for an expected duration of six months. Based on the Traffic Impact Analysis submitted to Missoula County by the applicant, each of the approximately 30 construction-related vehicle trips per week is expected to carry an average of 1-2 workers, who would typically be on site 8 hours per day, 5 days per week during the six-month construction period.

Facility startup is expected to last another six months with approximately five trips per week. During the initial startup period (approximately two weeks), the operator anticipates having about three personnel on site 5–7 days per week, each arriving in a separate vehicle, including one small crane or lift truck. Following this initial startup period, staffing and associated trips are expected to decrease to approximately one person on site daily for an additional two weeks, and then transition to the long-term average of roughly two trips per week for routine operation and maintenance, as previously described. These changes represent a small, localized increase in construction employment and traffic and are expected to have a negligible effect on local labor markets, tax base, or public services.

Secondary Impacts

Secondary socioeconomic impacts directly attributable to the WWTF are not anticipated. The facility itself would not materially alter regional employment, housing demand, or public needs.

Cumulative Impacts

Cumulative impacts to socioeconomics of the overall Blackfoot Crossing development are being evaluated in separate county planning processes; the WWTF's contribution to those broader impacts are limited to providing centralized wastewater service and the WWTF would not independently cause cumulative socioeconomic impacts.

2.10 Private Property Impacts

The proposed project would take place on private land owned by the applicant. DEQ's approval of the WWTF would affect the applicant's real property by authorizing regulated activities subject to permit conditions. DEQ has conducted the required takings analysis and determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements. Therefore, DEQ's approval of the WWTF would not have private property-taking or damaging implications.

2.11 Greenhouse Gas Assessment

Based on the facility's size and anticipated operating conditions, total WWTF electricity use is expected to be on the order of tens of megawatt-hours per year, with aeration representing the largest single electrical load. Ancillary loads would include pumps, controls, lighting, and building HVAC, with only intermittent use of small vehicles and equipment for operations and maintenance. This level of energy use would correspond to a very small fraction of county- or state-wide greenhouse gas emissions and would not measurably affect regional or global climate.

Construction-phase emissions would be temporary and primarily associated with equipment exhaust and worker/haul trips over an estimated six-month construction period, followed by a short startup period. Given the small scale of the facility and the lack of any large combustion sources, greenhouse gas emissions associated with construction and operation of the WWTF are expected to be minor and not significant.

In reaching this conclusion, DEQ considered the context and intensity of potential greenhouse gas emissions, including the facility's limited electrical demand, the absence of flaring or high-capacity combustion units, and the fact that the WWTF would not materially change regional energy infrastructure or fossil-fuel use. DEQ has used its discretion as allowed by Section 1 of Senate Bill 221, passed in the 2025 Legislative Session, to forego further analysis for this resource area. In making this determination, DEQ relied on the *Guidance for Greenhouse Gas Impact Assessments Under the Montana Environmental Policy Act* (Department of Environmental Quality, 2026).

3. Description of Alternatives

In addition to the proposed action, DEQ must also evaluate a "no-action" alternative. Under this alternative, DEQ would deny approval for construction of the WWTF. Without approval, the applicant would lack the authority to proceed with the proposed activities, and any potential impacts associated with the project would not occur. The "no-action" alternative serves as the baseline against which the impacts of the proposed action are measured.

If the applicant demonstrates full compliance with all applicable rules and regulations, the "no-action" alternative would not be appropriate.

The preferred action is to construct a new centralized wastewater treatment facility utilizing influent screening, bioreactors, membrane filtration, and ultraviolet light disinfection followed by disposal via rapid infiltration basins.

Other reasonable treatment alternatives include the following:

- The use of decentralized wastewater treatment and disposal, such as a series of septic tanks and drainfields. This alternative does not provide the same level of treatment as the proposed MBR facility and was dismissed from consideration.
- Connection to the City of Missoula's wastewater collection system was considered and dismissed as infeasible due to the location of the project outside of the City limits and the lack of nearby collection system piping.
- Different types of wastewater treatment were considered and dismissed. The proposed MBR is a proven, reliable treatment method that typically produces a high-quality effluent.

Other reasonable disposal alternatives include the following:

- Discharge to the Blackfoot River. This method of disposal would require an MPDES surface water discharge permit but was dismissed at this time in favor of the proposed infiltration basins.
- Discharge via irrigation at agronomic uptake rates was considered and dismissed due to the irrigation area and effluent storage area requirements.

The Department's action to provide this authorization is consistent with adopted Department design standards.

3.2.a. No Action

The "no-action" alternative would result in denial of the Facility Plan, preventing the applicant from collecting sewage from the proposed action, the WWTF. Consequently, any potential impacts associated with the proposed action would not occur. This alternative establishes the baseline for evaluating the impacts of the proposed action. However, if the applicant demonstrates full compliance with all applicable rules and regulations, the "no-action" alternative would not be appropriate.

4. Consultation

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries with the permittee's application materials and the following websites:

• Montana Natural Heritage Program
• Montana State Historic Preservation Office

DEQ used the publicly available information from these websites to conduct the impact analysis discussed above in **Section 2**.

The following agencies were contacted regarding the proposed action:

The Montana Department of Natural Resources and Conservation (DNRC) was solicited for comments via letter on September 26, 2024, regarding impacts to the floodplain due to the proposed project. DNRC responded via an email on October 2, 2024 stating that portions of the proposed project are located adjacent to a FEMA mapped regulatory floodplain. Construction within a mapped floodplain will require a permit from Missoula County. The Blackfoot Crossing development team will submit a floodplain permit to Missoula County, if necessary.

The Montana Department of Fish, Wildlife and Parks (MTFWP) was solicited for comments via letter on April 30, 2024 and September 26, 2024 regarding any impacts to fish and wildlife due to the proposed project. No comments from MTFWP have been received at the time of this report.

The Montana State Historic Preservation Office (SHPO) was solicited for comments via letter on September 26, 2024 and reviewed the project for historical significance. SHPO responded via email on October 2, 2024. According to their records, there have been a few previously recorded sites and a few cultural resource inventories done within the designated search locales. SHPO stated that as long as there will be no disturbance or alteration to structures over fifty years of age, they feel that there is a low likelihood that cultural properties would be impacted and, as such, felt a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or cultural materials be inadvertently discovered during the project, SHPO must be contacted, and the site investigated.

The U.S. Department of the Army Corps of Engineers (USACE) was solicited for comments via letter on April 30, 2024 and September 26, 2024, regarding impacts to wetlands due to the proposed project. The USACE stated in an October 9, 2024 response letter that if the proposed involves activities within navigable reivers of the United States, it may be subject to a Section 10 permit. The letter also stated that placement of fill material in any area below the ordinary high-water mark of any stream channel, lake or pond, or wetland would require a 404 permit. LCWSD emailed the USACE on October 10, 2024 to provide additional project specific information to determine whether a permit through the agency would be required. The USACE responded on October 30, 2024 that the project does not require Department of the Army approval under section 404 of the Clean Water Act nor under Section 10 of the Rivers and Harbors Act. Since there is no USACE 404 authorization, there is no Section 401 certification by DEQ.

The U.S. Fish and Wildlife Service (USFWS) was solicited for comments via letter on April 30, 2024 and September 26, 2024. No response from the USFWS has been received at the time of this report.

The Montana Sage Grouse Habitat Conservation Program website was consulted to determine whether the project has any potential impacts to sage grouse. It was determined that the project is not located in an Executive Order Area and further efforts are not warranted regarding sage grouse.

5. Significance of Potential Impacts and Need for Further Analysis

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

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- 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;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
- The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
- The importance to the state and to society of each environmental resource or value that would be affected;
- 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
- Potential conflict with local, state, or federal laws, requirements, or formal plans.

The Proposed Action would meet the minimum applicable requirements of the Montana Public Water Supplies, Treatment, and Distribution Laws and Montana Water Quality Act and associated administrative rules regulating public wastewater treatment facilities. Adherence to Title 75, chapter 6, MCA; Title 75, chapter 5, MCA; ARM 17.38.101 (incorporating Circular DEQ-2); ARM Title 17, chapter 30 (including nondegradation and groundwater protection provisions); and other applicable DEQ approval conditions would mitigate the potential for

impacts to human health and the environment by the Proposed Action. DEQ has determined that groundwater discharge from the proposed wastewater treatment system would result in non-significant changes in water quality, consistent with Section 75-5-301(5)(d), MCA. In particular, the nondegradation analysis prepared for the facility plan (see Section 2.2) demonstrates that, under Phase 1 design conditions, groundwater concentrations at points of compliance are expected to remain below applicable standards and trigger values, and that the WWTF's total nitrogen loading is below the one-pound-per-day threshold for MGWPCS permitting discussed in Section 1.3.

In evaluating the significance of potential impacts under ARM 17.4.608, DEQ considered the context and intensity of the Proposed Action, including the small project footprint, previously disturbed industrial setting, advanced treatment design, subsurface disposal, and the absence of significant effects on sensitive resources such as groundwater, surface water quality in the Blackfoot River and Clark Fork River system, air quality (including maintenance-area status), cultural resources, and human health and safety. Potential adverse impacts identified in Section 2 are minor in intensity, localized to the WWTF project site and its immediate vicinity, and limited in duration primarily to the construction and startup periods. The probability of adverse impacts is low, given the design features, mitigation measures, permit conditions, and best management practices that would be implemented if DEQ approves the Proposed Action.

Any affected resources are not considered unique or unusually fragile in this context, and the Proposed Action would not induce or inhibit regional growth, set a precedent for future actions beyond this specific facility-plan approval, or conflict with applicable local, state, or federal laws, requirements, or formally adopted plans. When considered together with other existing and concurrent actions, the WWTF's contribution to cumulative impacts on land, water, air, biological resources, socioeconomics, and cultural resources is expected to be negligible.

DEQ has based its consideration on all the criteria set forth in ARM 17.4.608 and has determined that the Proposed Action would not significantly affect the quality of the human environment. Therefore, an environmental assessment is the appropriate level of environmental review, and preparation of an environmental impact statement is not required.

6. Preparation

Environmental Assessment and Significance Determination prepared by:

Digitally signed by Matthew Waite
Date: 2026.04.13 08:39:42 -06'00'

Matthew Waite, Environmental Engineer DATE

Environmental Assessment Reviewed by:

Craig Jones – MEPA Coordinator

Isabelle Nebel – DEQ Attorney

Approved by:

Rachel Clark

Digitally signed by Rachel Clark
Date: 2026.04.13 08:30:06 -06'00'

Rachel Clark, Engineering Bureau Chief DATE

7. References

Department of Environmental Quality. (2026). *Guidance for Greenhouse Gas Impact Assessments Under the Montana Environmental Policy Act.* Helena: Department of Environmental Quality.

Federal Emergency Management Agency. (n.d.). *FEMA Flood Map Service Center: Search By Address*. Retrieved from FEMA Flood Map Service Center: https://msc.fema.gov/portal/search?AddressQuery=Milltown%20Montana

Missoula Public Health. (n.d.). *Air*. Retrieved from Missoula Public Health: https://missoulapublichealth.org/environment/air/

Montana Natural Heritage Database. (n.d.). *Montana Field Guide: Species Status Codes*. Retrieved from mt.gov: https://fieldguide.mt.gov/statusCodes.aspx?scrollto=msrc:rank

Montana Sage Grouse Habitat Conservation Program. (n.d.). *Montana Sage Grouse Habitat Conservation Map*. Retrieved from Montana Sage Grouse Habitat Conservation Program: https://sagegrouse.mt.gov/ProgramMap

Montana State Historic Preservation Office. (2024, June). *Montana SHPO Consultation Guide. A HANDBOOK FOR CULTURAL RESOURCE REVIEW AND COMPLIANCE IN MONTANA.*

Retrieved from Montana SHPO Consultation Guide.: https://mths.mt.gov/Shpo/docs/ConsultingWith/MTSHPO_ConsultationGuide.pdf

Pawel Krzeminski, J. H. (2012). Specific energy consumption of membrane bioreactor (MBR) for sewage treatment. *Water Science & Technology*, 380-392.

United States Census Bureau. (n.d.). *QuickFacts. Missoula County, Montana*. Retrieved from United States Census Bureau QuickFacts: https://www.census.gov/quickfacts/fact/table/missoulacountymontana/LND110210

The following documents have been utilized in the engineering review of this project and are considered to be a part of the project file:

1. Miscellaneous Correspondence – Cultural Resource Survey: Blackfoot Crossing Subdivision, Missoula County, Montana, May 2025, prepared by Western Cultural, Inc.
2. Miscellaneous Correspondence – Preliminary Report of Geotechnical Investigation, West Bonner Lumber Yard Development Bonner, Montana April 2022, prepared by Sara Dalen, EI Staff Geotechnical Engineer, Tetra Tech, Reviewed by Marco Fellin P.E. Senior Geotechnical Engineer, Tetra Tech.
3. Miscellaneous Correspondence – Enereau System Manual, Blackfoot Crossing, ESP24043
4. Non-degradation Report, Blackfoot Crossing, November 3, 2025, Synergy Engineering & Konsulting.
5. Facility Reports and Design Plans, Blackfoot Crossing, July 11, 2025, November 6, 2025, and January 9, 2026, Synergy Engineering & Konsulting.
6. Hydrogeology Data for Nondegradation Analysis at West Bonner Log Yard, January 18, 2023, WGM Group.
7. Report of Geotechnical Investigation West Bonner Lumber Yard Development, July 8, 2022, Tetra Tech.
8. Infiltration Testing Memo, Blackfoot Crossing, Bonner, December 9, 2025, Tetra Tech.
9. Preliminary Mounding Analysis for Blackfoot Crossing Rapid Infiltration Basin, December 12, 2025, Tetra Tech.

8. Public Involvement: Comment Summary and Responses

DEQ determined that a public comment period of 30 days was appropriate for this proposed action, and collected comment from January 30th, 2026 to March 1, 2026. DEQ received a single comment letter in response to the draft EA, summarized below.