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Draft
Environmental Assessment

Replacement/Upgrade of Comfort Station Wastewater Treatment System

June 2021

Draft Environmental Assessment
MEPA, NEPA, MCA 23-1-110 CHECKLIST

PART I. PROPOSED ACTION DESCRIPTION

1. Type of proposed state action: a new septic drainfield to adequately address the increased visitation, both current and projected out 20 years, at Lewis & Clark Caverns State Parks. The current drainfield does not support the level of use we have been experiencing resulting in the comfort station backing up throughout the summer. The drainfield will be located at the northwest end of the state park campground.

2. Agency authority for the proposed action

MSP has the authority to develop outdoor recreational resources in the state per 23-2-101 Montana Code Annotated (MCA): "*for the purposes of conserving the scenic, historic, archaeologic, scientific, and recreational resources of the state and providing their use and enjoyment, thereby contributing to the cultural, recreational and economic life of the people and their health*."

Furthermore, state statue 23-1-110 MCA and ARM 12.2.433 guides public involvement and comment for the improvements at state parks and fishing access sites, which this document provides. ARM 12.8.602 required the Department to consider the wishes of the public, the capacity of the site for the development, environmental impacts, long-range maintenance, protection of natural features and impacts on tourism as these elements relate to development or improvement to state parks. This document describes the proposed project in relation to this rule.

3. Name, address and phone number of project sponsor (if other than the agency):

Montana Fish, Wildlife & Parks
PO Box 200701
Helena, MT 59620-0701
406-577-7892

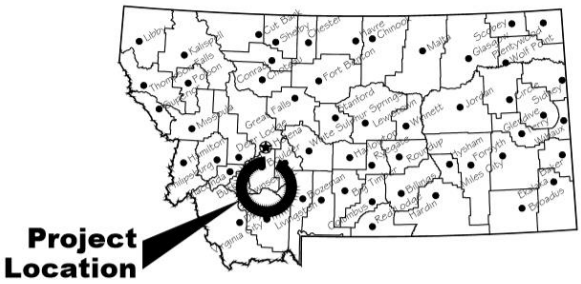
4. Anticipated Schedule:

Estimated Commencement Date: Fall 2021
Estimated Completion Date: Spring 2022

5. Location affected by proposed action:

Southeast 1/4 of Section 17, Township 01 North, Range 02 West
Latitude: 45.83808º North; Longitude: 111.86763º West
City/Town: **Whitehall** County: **Jefferson**

Jefferson County, Section 21, T1N, R2W. The park is 22 miles west of Three Forks on Montana Hwy 2 or 18 miles east of Whitehall on Montana Hwy 2.



Location Map
No Scale

PROJECT VICINITY MAP

6. Project size -- estimate the number of acres that would be directly affected that are currently:

Acres		Acres	
(a) Developed:		(d) Floodplain	0
Residential	0		
Industrial	0	(e) Productive:	
(existing shop area)		Irrigated cropland	0
(b) Open Space/	1-2	Dry cropland	0
Woodlands/Recreation		Forestry	0
(c) Wetlands/Riparian	0	Rangeland	0
Areas		Other	0

7. Permits, Funding & Overlapping Jurisdiction.

(a) Permits: Any required permits will be filed at least 2 weeks prior to project start.

(b) Funding:

Agency Name: Fish, Wildlife & Parks	Funding Amount
Construction estimate	$900,000
Total Project Estimate	$900,000

Funding sources for this infrastructure project is $600,000 Parks Earned Revenue Account (ERA) and $300,000 Accommodations Tax appropriated in House Bill 5/2017 Legislative Session.

(c) Other Overlapping or Additional Jurisdictional Responsibilities:

Agency Name	Type of Responsibility
MT Dept. of Environmental Quality	Montana Ground Water Pollution Control System (MGWPCS); A permit request has been submitted to DEQ and they are reviewing the plans and will issue a permit after the review and any required plan changes are completed.
Montana State Historic Preservation Office	cultural and historic resources

Funding sources for this infrastructure project is $600,000 Parks Earned Revenue (ERA) and $300,000 Accommodations Tax appropriated in House Bill 5/2021.

8. Narrative summary of the proposed action:

Lewis & Clark Caverns Campground

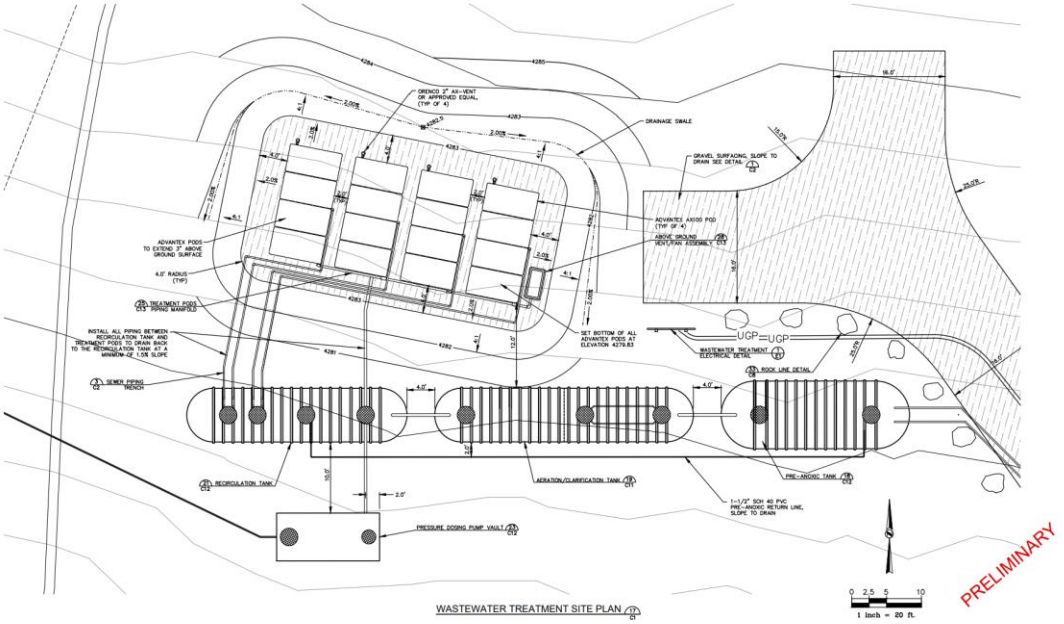
Montana State Parks (MSP) proposes to replace the wastewater treatment system serving the public restroom facilities at the pavilion and the campground. The current comfort station facility at Lewis & Clark Caverns State Park was erected in the mid-1970s for the visitors who use the 42 sites in the campground. The comfort station consists of restrooms, showers and electric services. The RV dump station was also built in the 1970's to specifically to serve RV users with dump service and freshwater for filling tanks. With the use of a reservation system starting in 2011, campground use has increased each year. In 2019, the occupancy rates were: June 73%, July 94%, August 89% and September 75%. Both the comfort and dump stations are unable to adequately function with this increase in use. The proposed new septic drainfield will be large enough to address the current use and can accommodate a new comfort station in the future.

A 2015 Facility Condition Inventory, conducted by Great West Engineering, identified the current wastewater system for the campground comfort station as needing significant infrastructure repairs; summer usage was beyond its capacity. The frequent sewage backup is a health and safety concern.

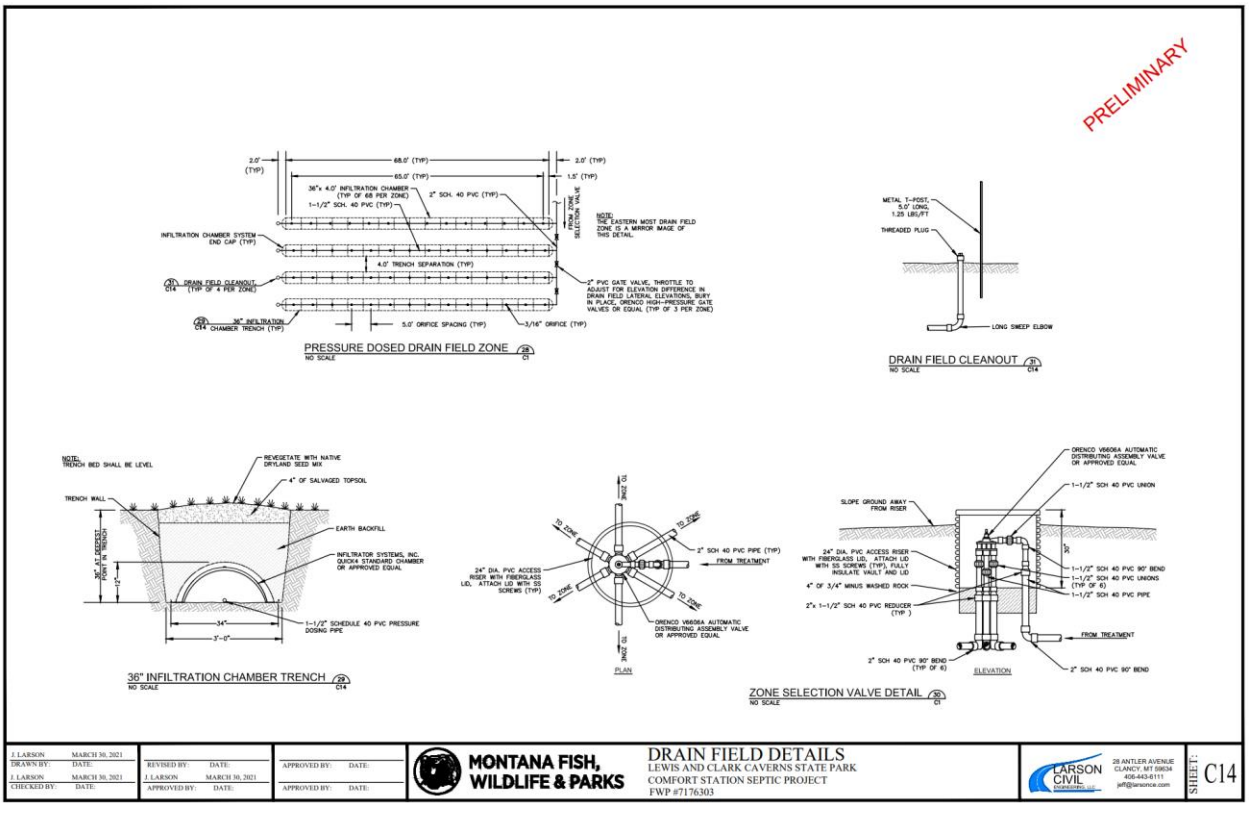
9. Description and analysis of reasonable alternatives:

Alternative A: No Action – Keeping the campground waste and facility system at its current outdated state will eventually result in reductions in functioning capacity. The system routinely backs up each July during its heaviest usage resulting in emergency plumbing costs, reduced guest services and unappealing memories for visitors during the episodes. More leaks occur after each season requiring more repair costs as well as indicating a limited use-life. When the system fails it will result in reduced Parks revenue and interrupted guest amenities. Visitors will either opt to leave or be turned away from the site.

Alternative B: Proposed Action (Preferred) – Construct a new comfort station septic drainfield in the northwest corner of the campground. The new proposed septic drainfield will be designed to accommodate increased visitor use and be of sufficient size to serve an updated comfort station in the future. This septic drainfield will replace the current septic drainfield. It will better serve visitors in the campground, group events area, and the Cave Gulch Trails system. It will not only immediately better the guests' experiences but could also allow potential campground expansion and result in increased park revenue as a Montana tourist destination.



Preliminary Wastewater Treatment Site Plan



Preliminary Drain Field Details

10. Evaluation and listing of mitigation, stipulation, or other control measures enforceable by the agency or another government agency:

DEQ requires preapplication baseline water quality monitoring of the known on-site springs and water wells. DEQ requires FWP to continue this monitoring requirement twice per year through the term of the permit.

DEQ is reviewing the testing results and engineering report on groundwater, the amount of wastewater and strength of the wastewater and the design of the proposed system to meet DEQ treatment requirements.

As a condition of DEQ approval, FWP will be required to monitor and report monitoring results once per year to characterize the effluent, and to demonstrate operation and maintenance of the wastewater treatment system. All analytical methods must be in accordance with the Code of Federal Regulations, 40 CFR Part 136 for each monitored parameter.

PART II. ENVIRONMENTAL REVIEW CHECKLIST

The analysis of the physical and human environments discussed on the following pages is limited to the preferred alternative, Alternative B. The reason for this is that under Alternative A, FWP would not pursue the campground improvements thus no physical resources would be altered. The facilities at Lewis & Clark Caverns State Park would remain status quo within the campground area with routine maintenance being completed more often as needed.

Evaluation of the impacts of the Proposed Action including secondary and cumulative impacts on the Physical and Human Environment.

A. PHYSICAL ENVIRONMENT

1. LAND RESOURCES Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Soil instability or changes in geologic substructure?			X			1a
b. Disruption, displacement, erosion, compaction, moisture loss, or over-covering of soil, which would reduce productivity or fertility?			X		X	1a.
c. Destruction, covering or modification of any unique geologic or physical features?		X				
d. Changes in siltation, deposition or erosion patterns that may modify the channel of a river or stream or the bed or shore of a lake?		X				
e. Exposure of people or property to earthquakes, landslides, ground failure, or other natural hazard?			X			1b.

1a Disturbed ground soil will be reseeded to native grasses.
1b Minor earthquake activity.

2. AIR Will the proposed action result in:	IMPACT *					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Emission of air pollutants or deterioration of ambient air quality? (Also see 13 (c).)			X			2a.
b. Creation of objectionable odors?			X			2a.
c. Alteration of air movement, moisture, or temperature patterns or any change in climate, either locally or regionally?		X				
d. Adverse effects on vegetation, including crops, due to increased emissions of pollutants?		X				
e. For P-R/D-J projects, will the project result in any discharge, which will conflict with federal or state air quality regulations? (Also see 2a.)		X				

2a Best management practices are encouraged during construction of the replacement treatment system and drainfield to mitigate particulates produced. Changes in air quality would be short-term, during construction only.

3. WATER Will the proposed action result in:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Discharge into surface water or any alteration of surface water quality including but not limited to temperature, dissolved oxygen or turbidity?			X			3a.
b. Changes in drainage patterns or the rate and amount of surface runoff?			X			3b.
c. Alteration of the course or magnitude of floodwater or other flows?		X				
d. Changes in the amount of surface water in any water body or creation of a new water body?		X				
e. Exposure of people or property to water related hazards such as flooding?		X				
f. Changes in the quality of groundwater?		X				
g. Changes in the quantity of groundwater?		X				
h. Increase in risk of contamination of surface or groundwater?			X		X	3c.
i. Effects on any existing water right or reservation?		X				
j. Effects on other water users as a result of any alteration in surface or groundwater quality?		X				
k. Effects on other users as a result of any alteration in surface or groundwater quantity?		X				
l. For P-R/D-J, will the project affect a designated floodplain? (Also see 3c.)		X				
m. For P-R/D-J, will the project result in any discharge that will affect federal or state water quality regulations? (Also see 3a.)		X				

3a. No shallow ground water bearing units have been identified near the proposed construction.
3b. Construction activities may impact water quality by contributing discharges of sediment to surface waters. Construction will include best management practices to minimize impact and to protect nearby surface waters.
3c. All discharge disposal structures must meet the minimum set back requirements which could include surface water, flood plains, ditches and springs. Water in the 3 wells will be tested twice yearly per DEQ permit requirements.

The campground has an existing irrigation system for trees near campground Loops A, B, and E. Additionally, there is a drain field southwest of the current comfort station. Neither one of these components will be affected by the proposed plan; however, the potential for increased irrigation installations to beautify more of the campground will exist.

4. VEGETATION Will the proposed action result in?	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Changes in the diversity, productivity or abundance of plant species (including trees, shrubs, grass, crops, and aquatic plants)?			X		X	4a.
b. Alteration of a plant community?			X			4b.
c. Adverse effects on any unique, rare, threatened, or endangered species?		X				
d. Reduction in acreage or productivity of any agricultural land?		X				
e. Establishment or spread of noxious weeds?			X		X	4a.
f. For P-R/D-J, will the project affect wetlands, or prime and unique farmland?		X				
g. Other:						

4a Disturbed soils will be replanted in native seed mix and monitored closely by park staff to eradicate any weeds that might take hold. Currently, park's staff works closely with the Jefferson County Weed Supervisor to manage established noxious weeds within and near the park. Control efforts will follow the guidelines presented in the FWP Integrated Noxious Weed Management Plan.
4b Though native grass seed will be used to replant the disturbed area, these will not totally match the plant community currently on site.

5. FISH/WILDLIFE Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Deterioration of critical fish or wildlife habitat?		X				
b. Changes in the diversity or abundance of game animals or bird species?			X			5a.
c. Changes in the diversity or abundance of nongame species?			X			5a.
d. Introduction of new species into an area?		X				
e. Creation of a barrier to the migration or movement of animals?		X				
f. Adverse effects on any unique, rare, threatened, or endangered species?			X			5b.
g. Increase in conditions that stress wildlife populations or limit abundance (including harassment, legal or illegal harvest or other human activity)?			X			5a.
h. For P-R/D-J, will the project be performed in any area in which T&E species are present, and will the project affect any T&E species or their habitat? (Also see 5f.)		X				
i. For P-R/D-J, will the project introduce or export any species not presently or historically occurring in the receiving location? (Also see 5d.)		X				

5a Changes in abundance to game in the park would be short-term, during construction only. These species largely avoid the campground area because of the human presence but may return to the site when the proposed project is completed, and noise levels return to normal.
5b Based on a search of the Natural Heritage Database, there are no species listed in the local vicinity of the proposed drainfield.
There were three species listed as either S1 or S2, within the regional area surrounding the proposed facility; none of which are listed as LE, or LT (http://fieldguide.mt.gov/statusCodes.aspx#msrc:rank).
These species are listed below:
Polioptila caerulea,
Cyptobunus cavicolus,
Oncopodura cruciate.
The project site is not listed as being located within sage grouse habitat.

A search of the Montana Natural Heritage database revealed three sensitive species near the proposed areas of construction. The three species are Townsend's Big-eared Bat, Spotted Bat and the Fringed Myotis. All these species are known to move through the area accessing the caverns or cliffs for roosting. It is the opinion of FWP's non-game wildlife biologist the proposed project will not have any negative impacts on the species.

B. HUMAN ENVIRONMENT

6. NOISE/ELECTRICAL EFFECTS Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Increases in existing noise levels?			X			6a.
b. Exposure of people to serve or nuisance noise levels?			X			
c. Creation of electrostatic or electromagnetic effects that could be detrimental to human health or property?		X				
d. Interference with radio or television reception and operation?		X				

6a Construction will increase noise levels with the machinery involved but should not be permanent, affecting those involved in the area only short-term.

7. LAND USE Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of or interference with the productivity or profitability of the existing land use of an area?			X			7a.
b. Conflicted with a designated natural area or area of unusual scientific or educational importance?			X			7b.
c. Conflict with any existing land use whose presence would constrain or potentially prohibit the proposed action?		X				
d. Adverse effects on or relocation of residences?		X				

7a Existing recreation access will be maintained upon construction. The project will likely increase the profitability of the park campground.
7b Though near the group use area and the Cheatgrass remediation test plot, the proposed site is currently not used for scientific or educational purposes.

8. **RISK/HEALTH HAZARDS** **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Risk of an explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation) in the event of an accident or other forms of disruption?			X			8a.
b. Affect an existing emergency response or emergency evacuation plan, or create a need for a new plan?			X			8b.
c. Creation of any human health hazard or potential hazard?		X				
d. For P-R/D-J, will any chemical toxicants be used? (Also see 8a)		X				

8a Best management practices are encouraged during construction of the project to mitigate particulates produced. These changes would be short-term, during construction only.

8b The Cave Gulch Trail is listed in the Park Emergency Management Plan as a backup evacuation route from the Cave Visitor Center area. The scope of the proposed work would occur outside Cave Tour operations, so this backup route would not routinely be used in the off-season except in the rare case of an emergency involving trail users. Eventually the current Park Emergency Plan will need to be updated to include this facility in its operations and to consider the best location of the Helicopter landing zone south of the new construction.

9. COMMUNITY IMPACT Will the proposed action result in:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of the location, distribution, density, or growth rate of the human population of an area?		X				
b. Alteration of the social structure of a community?		X				
c. Alteration of the level or distribution of employment or community or personal income?			X			9a.
d. Changes in industrial or commercial activity?			X			9b.
e. Increased traffic hazards or effects on existing transportation facilities or patterns of movement of people and goods?		X				

9a. The construction of the replacement wastewater treatment systems and discharge structure may result in the creation of several temporary jobs until construction is completed. Through the competitive bidding process for services, it is possible that a locally owned business could be chosen for the project, which would positively support the local economy and residents of the area.
9b. Adding services at Lewis & Clark Caverns is seen as a positive impact to the overall tourism and economic vitality of the region. The region continues to experience good tourism and demand for camping is strong, indicating that commercial activity will continue to be spread amongst the regional camping locations.

10. PUBLIC SERVICES/TAXES/UTILITIES Will the proposed action result in:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Will the proposed action have an effect upon or result in a need for new or altered governmental services in any of the following areas: fire or police protection, schools, parks/recreational facilities, roads or other public maintenance, water supply, sewer or septic systems, solid waste disposal, health, or other governmental services? If any, specify:		X				
b. Will the proposed action have an effect upon the local or state tax base and revenues?			X			10a.
c. Will the proposed action result in a need for new facilities or substantial alterations of any of the following utilities: electric power, natural gas, other fuel supply or distribution systems, or communications?		X				
d. Will the proposed action result in increased use of any energy source?		X				
e. Define projected revenue sources			X			10a.
f. Define projected maintenance costs.				X		10b.

10a. The proposed project will likely show a slight increase in area tourism dollars as more visitors use the campground or remain more nights due to the improved amenity.
10b. An increase will be required to the park's operations budget due to additional monitoring and DEQ permits and testing.

Park Camping Cabins (4) and the Pavilion may see an increase in use and contribute additional revenue due to a fully functioning Comfort Station wastewater treatment system.

11. AESTHETICS/RECREATION Will the proposed action result in:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of any scenic vista or creation of an aesthetically offensive site or effect that is open to public view?		X				
b. Alteration of the aesthetic character of a community or neighborhood?		X				
c. Alteration of the quality or quantity of recreational/tourism opportunities and settings? (Attach Tourism Report.)				X		11a.
d. For P-R/D-J, will any designated or proposed wild or scenic rivers, trails or wilderness areas be impacted? (Also see 11a, 11c.)			X			11b.

11a. Adding services at Lewis & Clark Caverns is seen as a positive impact to the overall tourism and economic vitality of the region. The region continues to experience good tourism and demand for camping is strong, indicating that commercial activity will continue to be spread amongst the regional camping locations.

11b. Existing recreation trails access will be maintained upon completion of construction while increasing services to the campground.

12. CULTURAL/HISTORICAL RESOURCES Will the proposed action result in:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Destruction or alteration of any site, structure or object of prehistoric historic, or paleontological importance?		X				
b. Physical change that would affect unique cultural values?		X				
c. Effects on existing religious or sacred uses of a site or area?		X				
d. For P-R/D-J, will the project affect historic or cultural resources? Attach SHPO letter of clearance. (Also see 12.a.)		X				

SIGNIFICANCE CRITERIA

13. SUMMARY EVALUATION OF SIGNIFICANCE Will the proposed action, considered as a whole:	IMPACT Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Have impacts that are individually limited, but cumulatively considerable? (A project or program may result in impacts on two or more separate resources that create a significant effect when considered together or in total.)		X				
b. Involve potential risks or adverse effects, which are uncertain but extremely hazardous if they were to occur?		X				
c. Potentially conflict with the substantive requirements of any local, state, or federal law, regulation, standard or formal plan?		X				
d. Establish a precedent or likelihood that future actions with significant environmental impacts will be proposed?		X				
e. Generate substantial debate or controversy about the nature of the impacts that would be created?		X				
f. For P-R/D-J, is the project expected to have organized opposition or generate substantial public controversy? (Also see 13e.)		X				
g. For P-R/D-J, list any federal or state permits required.		X				

PART III. NARRATIVE EVALUATION AND COMMENT

This EA only revealed negligible impacts to the physical and human environment stemming from the proposed action. No threatened or endangered species would be affected, and no unique or physical features would be disturbed.

The proposed action would benefit visitors to Lewis & Clark Caverns State Park by replacing the outdated and barely functional comfort facility within the campground, thus allowing continued use with less likelihood of damaging the park resources or interrupting park use during peak season.

Disruption of wildlife, recreation, and other public uses at Lewis & Clark Caverns State Park would be temporary and occur intermittently during the construction period. Following the completion of the project, resource impacts would likely be minimized through replanting of native seeds and monitoring possible weed growth.

The proposed project would ensure public health and safety standards are complied with, and environmental resources would be protected. In short, the proposed project would replace an antiquated system and visitor customer services at Lewis & Clark Caverns State would not be interrupted.

PART IV. PUBLIC PARTICIPATION

1. Public involvement:

The public will be notified in the following manners to comment on this current EA, the proposed action and alternatives:

- Two public notices in each of these papers: *The Whitehall Ledger, Montana Standard, and Bozeman Chronicle, Helena Independent Record and the Boulder Monitor.*
- One statewide press release;
- Public notice on the Fish, Wildlife & Parks web page: Public Notices | Montana FWP (mt.gov)

This level of public notice and participation is appropriate for a project of this scope having limited impacts, many of which can be mitigated.

2. Duration of comment period:

The public comment period will extend for (30) thirty days. Written comments will be accepted until 5:00 p.m., July 28, 2021 and can be mailed or emailed to the addresses below:

PART V. EA PREPARATION

1. Based on the significance criteria evaluated in this EA, is an EIS required? (YES/NO)?

No

If an EIS is not required, explain why the EA is the appropriate level of analysis for this proposed action.

Based on the criteria provided by MEPA Model Rule III to assess if an EIS is required, this environmental review revealed no significant long-term, negative impacts would be created from the proposed action. Therefore, an EIS is not necessary and an EA is the appropriate level of analysis.

2. Person(s) responsible for preparing the EA:

Betsey LaBroad
Montana Fish, Wildlife & Parks
Regional Park Manager, Region 3
1400 S 19th Ave
Bozeman, MT 59718
(406)577-7892

Rhea Armstrong
Montana Fish, Wildlife & Parks
Lewis & Clark Caverns State Park Manager
PO Box 489
Whitehall, MT 59759
(406)287-3541

3. List of agencies or offices consulted during preparation of the EA:

Montana Fish, Wildlife & Parks:

- Design & Construction Bureau
- Fisheries Division
- Wildlife Division

Legal Bureau Parks Division
Montana Department of Commerce - Tourism
Montana State Historic Preservation Office (SHPO)
Montana Natural Heritage Program – Natural Resources Information System

APPENDIX A
23-1-110 MCA
PROJECT QUALIFICATION CHECKLIST

Date: 5/20/2021 **Person Reviewing:** Rhea K. Armstrong

Project Location: Lewis & Clark Caverns State Park Campground

Description of Proposed Work:

The following checklist is intended to be a guide for determining whether a proposed development or improvement is of enough significance to fall under 23-1-110 rules. (Please check □ all that apply and comment as necessary.)

[ ] A. New roadway or trail built over undisturbed land?
Comments*:*

[ ] B. New building construction (buildings <100 sf and vault latrines exempt)?
Comments*:*

[**X**]C. Any excavation of 20 c.y. or greater?
Comments*: There will be ground disturbance over 20 c.y. for the construction of the new drainfield.*

[ ] D. New parking lots built over undisturbed land or expansion of existing lot that increases parking capacity by 25% or more?
Comments*:*

[ ] E. Any new shoreline alteration that exceeds a doublewide boat ramp or handicapped fishing station?
Comments*:*

[ ] F. Any new construction into lakes, reservoirs, or streams?
Comments*:*

[ ] G. Any new construction in an area with National Registry quality cultural artifacts (as determined by State Historical Preservation Office)?
Comments*:*

[ ] H. Any new above ground utility lines?
Comments*:*

[ ] I. Any increase or decrease in campsites of 25% or more of an existing number of campsites?
Comments*:*

[ ] J. Proposed project significantly changes the existing features or use pattern; including effects of a series of individual projects?
Comments*:*

If any of the above are checked, 23-1-110 MCA rules apply to this proposed work and should be documented on the MEPA/HB495 CHECKLIST. Refer to MEPA/HB495 Cross Reference Summary for further assistance.