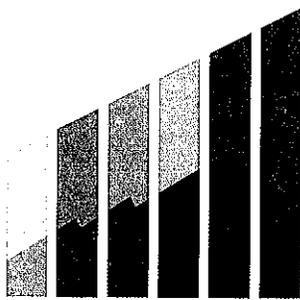


Appendix D

Public Comments



MONTANA

DEPARTMENT OF COMMERCE

COMMUNITY DEVELOPMENT DIVISION

October 21, 2013

Pam Holmquist, Chair
Flathead County Commission
Flathead County Courthouse
800 S. Main St.
Kalispell, MT 59901

Re: Community Development Block Grant (CDBG) Contract Contract MT-CDBG-12PF-01 – Soukup Complaint

Dear Chairwoman Holmquist:

Flathead County has been awarded \$450,000 in CDBG funds to provide assistance to the Intermountain Children's Home to construct a new youth facility. The project has just begun and is working to complete contract start-up conditions including the environmental review.

On October 11, 2013, Ms. Deborah Soukup of 899 N. Somers Rd., contacted the Montana Department of Commerce CDBG program seeking assistance from staff to help address concerns regarding the development of a youth facility, assisted with CDBG funds. Her primary concern was that the facility will be constructed on a site that is traditionally single-family residences.

More specifically, she stated the following additional issues and concerns during her contact with staff at CDBG:

- 1.) What will be the impact of the Intermountain facility on Somers schools?
- 2.) The proposed location of the facility driveway appears to be only 15 feet from her home. Can the lighting, parking, and general building area be located in the center of the Intermountain parcel, rather than on the west half?
- 3.) The facility will be located adjacent to the Blasdel Wetlands Protection area (office in Marion) where waterfowl hunters and fur trappers congregate. Are there safety issues being located so close to a wildlife refuge? When is hunting permitted? Has the refuge agency been

MEG O'LEARY, DIRECTOR

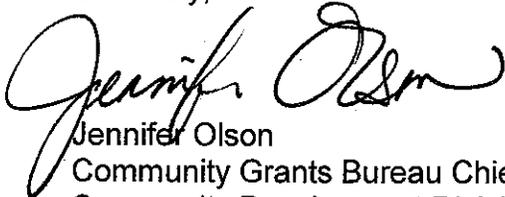
STEVE BULLOCK, GOVERNOR

- contacted regarding the proposed use? Is there a floodplain zone adjacent to the refuge and site area?
- 4.) Will property values be impacted by being located adjacent to this facility?
 - 5.) The facility will not be paying property taxes.
 - 6.) Was it correct for Intermountain to represent the project as a Somers community facility, when in fact the site is located north of Highway 82 and is located in an area more commonly referred to as part of Kalispell?
 - 7.) The cattle on the parcel currently constitute a nuisance in a generally single family residential area.
 - 8.) The neighbors were not notified of the proposed activity.
 - 9.) Is this proposal consistent with deed restrictions, other property use clauses, and a 600 foot easement that would be necessary to access the property?

The federal statute that governs the CDBG program and the CDBG Grant Administration Manual requires that "a timely written answer to written complaints and grievances" be provided by CDBG grantees "within 15 working days where practicable" [42 U.S.C. § 5304(a)(3)(E)]. The Montana CDBG Program formally requests that you or your representatives respond in writing to Ms. Soukup concerning the CDBG-assisted Flathead County project within 15 working days of your receipt of this letter, and provide a copy of your response to this office.

Thank you for your cooperation in this matter.

Sincerely,



Jennifer Olson
Community Grants Bureau Chief
Community Development Division
Montana Department of Commerce

cc: Ms. Deborah Soukup (*mailing address: PO Box 28, Somers, MT 59932*)
Debbie Pierson, Flathead County Grants Administrator
Jim Fitzgerald, Intermountain Children's Home

Christine Pearcy

From: Jespersen, Adam <adamj@intermountain.org>
Sent: Monday, January 06, 2014 1:00 PM
To: Tim Meldrum; Ali Havig (AliH@architects-sma.com); Klint Fisher (KlintF@architects-sma.com); Christine Pearcy
Subject: FW: Intermountain Providence Home EA

Good afternoon again,

Here is another comment just received from Fish, Wildlife, and Parks.

Thanks,

Adam Jespersen | Foundation Relations Officer | Intermountain | P: (406) 457.4837

Intermountain

restoring hope for children

www.intermountain.org



From: Debbie Pierson [<mailto:dpierson@flathead.mt.gov>]
Sent: Monday, January 06, 2014 12:55 PM
To: Jespersen, Adam
Subject: FW: Intermountain Providence Home EA

Hi Adam,

Can you forward all the comments received on to SMA so they are aware of the concerns that are being presented?

Thanks!

From: Vore, John [<mailto:jvore@mt.gov>]
Sent: Monday, January 06, 2014 12:01 PM
To: Elaine Nelson
Cc: BJ Grieve
Subject: Intermountain Providence Home EA

Dear Flathead County Board of Commissioners,

I would like to take this opportunity to address some concerns about the recent Environmental Assessment (EA) done by the Flathead County Planning Department concerning the proposed Intermountain Providence Home.

The EA does not adequately address the impacts of the proposed development on public use, particularly hunting, on the adjacent Blasdel Waterfowl Production Area (WPA). The Blasdel WPA was originally purchased by the US Fish & Wildlife Service to provide wildlife habitat and a place to hunt. It is a very popular place for people to hunt pheasants, and also provides opportunity to hunt Hungarian partridge (also known as gray partridge or Huns), deer, and waterfowl. The proposed placement of buildings in the development is close enough to the WPA that it will cause many hunters to avoid that portion of the WPA, and it will lead to complaints from future residents of the Providence Home about legal hunting activities. Although the EA states that there has been no accidents related to current houses within 150 feet of the WPA, those houses, by virtue of their close proximity, do impact public use of the WPA none the less by

forcing most hunters to avoid hunting along property lines. Further encroachment on the WPA by the Providence Home buildings will negatively impact the popular public recreational use. Moreover, the Blasdel WPA and nearby agricultural and open lands are very important for migratory waterfowl, game birds, both nesting and wintering raptors as well as a local population of white-tailed deer. Development of agricultural lands and conversion to development reduces the availability of food, cover, and security for these species.

The negative impacts on public use could be mitigated by providing a reasonable buffer for the WPA by moving the buildings farther north and west, away from the WPA boundary. I suggest a minimum buffer of 300 feet, but a larger buffer that would move the building envelope closer to existing houses, buildings and infrastructure would improve safety and allow for greater conservation of wildlife habitat in general, as recommended in FWP's Recommendations for Subdivision Development in Montana (available online at: <http://fwp.mt.gov/fishAndWildlife/livingWithWildlife/buildingWithWildlife/subdivisionRecommendations/>).

Other concerns that were not clearly addressed in the draft EA are potential impacts on ground water other than stating ground water is limited in this area and that the development will depend on ground water. Some of the wetlands on the WPA appear to be tied to the local ground water levels. Surface water tends to flow to the south so might the groundwater. We would also like to know what type of fencing, if any, is proposed. Some fence designs can impact wildlife movements or impact birds while others limit those risks.

We would be happy to meet or go on site with the developers to discuss any of these issues. Thanks for the opportunity to comment. Please contact me if you have any questions. Thank you.

John Vore
Montana Fish, Wildlife & Parks
Kalispell Area Wildlife Biologist
jvore@mt.gov
406-751-4584

This communication is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by telephone at 800-200-9112, and delete the email.



P.O. Box 70 · Polson, MT 59860
(406) 883-1346
Fax (406) 883-1357
lakers@flatheadlakers.org
www.flatheadlakers.org

Flathead Lakers:
*Working for clean water, a healthy
ecosystem, and lasting quality of life in
the Flathead Watershed*

January 5, 2013

Flathead Board of Commissioners
800 S Main St, Room 302
Kalispell, MT 59901

via email: enelson@flathead.mt.gov, pholmquist@flathead.mt.gov, gkrueger@flathead.mt.gov,
cscott@flathead.mt.gov

Dear Commissioners Holmquist, Krueger, and Scott:

The Flathead Lakers request that you refrain from releasing the Community Development Block Grant funds requested by Intermountain for its proposed Providence Home until deficiencies in the Environmental Assessment (EA) have been rectified and mitigation measures required.

The Flathead Lakers is a nonprofit organization dedicated to protecting clean water, healthy ecosystems, and lasting quality of life in the Flathead Watershed. Our organization was founded in 1958 and currently has 1,500 members.

The property on which this development is proposed encompasses shallow groundwater, which may be as little as five feet or less from the surface, and important habitat for waterfowl and other birds. Critical Lands Project partners, which include our organization, resource management agencies, and land conservation organizations, identified areas of shallow groundwater and associated wetlands and sloughs as high priorities for protection due to the services they provide, including clean water protection and wildlife habitat. We believe the EA does not adequately demonstrate that these public resources will not be significantly degraded by this development.

Soils and Groundwater:

The section of the EA on "Groundwater Resources Aquifer" describes only the deep aquifer, stating that the average depth to wells in the vicinity is 355 feet. Additional information is needed on shallow groundwater in this area and its potential impacts on the proposed project and potential impacts of the project on the groundwater. The EA should provide additional information about the infiltration rates for snow melt or rainfall on the property, as, due to the soil types and shallow groundwater, other farm lands in the area are known to periodically flood as the soils become saturated, with water pooling on the surface.

Stormwater:

The EA does not provide any information about the project's stormwater management plan, but merely states that the "stormwater controls are designed to MDEQ standards." More information

about the plan is needed to evaluate if it is appropriate for this area of shallow groundwater and nearby wetlands. The controls should be required to collect stormwater from all impervious surface areas, treat it to remove oil and other contaminants, contain it on the property, prevent it from creating surface channels, and ensure it is not directed to the shallow groundwater or toward wetlands on adjacent properties.

Sewage Treatment:

The EA does not discuss the type of septic system planned for this area of shallow groundwater. The number of residents the home would serve is unclear. The EA states the facility will house different numbers of residents in different sections, ranging from 8 to 23. The section on "waste water – sewage system" indicates "it is reasonable to assume that the wastewater system will be designed as a "public" system because it may accommodate more than 24 persons at any given time throughout the year." Information about the proposed system and the number of people it will serve is necessary to draw any conclusions regarding its adequacy in protecting the shallow groundwater and the connected wetland system adjacent to the project property.

Mitigation Measures, Wildlife and Hunting:

We support the recommended mitigation measure to move the building location further away from the Blasdel WPA and its wetlands and we support requiring it to be moved to the area of the property where there is the greatest depth to groundwater to help mitigate impacts to groundwater, wildlife, habitat, and hunting. Moving the proposed building further from the south and west property lines adjacent to the WPA is suggested in the EA as a mitigation measure for safety reasons. It is unclear in the EA whether this and other suggested mitigation measures are required or voluntary. The EA finds no impact to wildlife (the rationale given is because wildlife can just move to the adjacent Waterfowl Production Area (WPA)), habitat (the rationale given is that it's all farm land), or hunting. No evidence is given to support these conclusions. There may not be sufficient habitat in the WPA to support additional wildlife, and farm land often provides significant bird and other wildlife habitat (as has been shown for other properties in the area). The EA contradicts itself by saying there will be no impact on hunting while also stating that most hunters will likely voluntarily avoid the area adjacent to a home, which would impact hunting.

Project Size:

The EA indicates that an Intermountain Master Plan site plan shows future plans for multiple structures and parking for 300-400 cars for occasional events. Although these future plans are not considered in the EA's analysis, the environmental impacts would be much greater for that size of project, including the impacts to groundwater and, potentially, to wetlands on the adjacent Blasdel WPA from the much larger impervious surface area and additional vehicles. The EA does not evaluate cumulative impacts, as required in #8 of the environmental impact evaluation form. We encourage the county and Department of Commerce to require an evaluation of cumulative impacts, including impacts of proposed future project expansion.

We respectfully request that Flathead County and the Department of Commerce ensure that an amended EA be prepared that includes substantiation for the claims of no impact to the groundwater and habitat or require measures to mitigate impacts, and that the applicant be

required to revise the project to adopt all mitigation measures mentioned in the EA, as well as any additional mitigation measures needed to address needs that emerge from the amended EA. Thank you for your consideration.

Sincerely,



Greg McCormick
President



Robin Steinkraus
Executive Director

cc: Gus Byrom, Program Manager Housing and Public Facilities, Community Development Division, Department of Commerce, DOCCDBG@mt.gov

PO Box 771 • 35 4th Street West
Kalispell, MT 59903



t: 406.756.8993 • f: 406.756.8991
citizens@flatheadcitizens.org

www.flatheadcitizens.org

RECEIVED

JAN 06 2014

FLATHEAD COUNTY
COMMISSIONERS

*P.m.
before
5:00
EW*

Department of Commerce, Community Development Division
301 S. Park Avenue, P.O. Box 200523,
Helena, Montana 59620

BJ Grieve, Flathead County Planning Director & Environmental Certifying Officer
Pamela J. Holmquist, Chairman Flathead County Board of Commissioners
Flathead County Commissioners Office
800 South Main St, Room 302
Kalispell, MT 59901

Dear Decision Makers,

Please accept the following comments prepared in accordance with 24 CFR Part 58.

Citizens for a Better Flathead appreciates the opportunity to provide comments for your consideration regarding the Environmental Assessment (EA) prepared for Intermountain's Providence Group Home to be located on 75 acres of rural agricultural land located about one and one-half miles north of Flathead Lake, and adjacent to the US Fish and Wildlife's Blasdel Waterfowl Protection Refuge. Citizens for a Better Flathead as an organization seeks to promote sound planning through research and analysis of development and policy proposals, and by helping to identify best practices and solutions that support the economic, social, and environment health of this region now and for future generations. We represent over 1,500 voices for sound planning in the Flathead.

We recognize the valuable services that Intermountain, a Montana agency, has provided to vulnerable children and families in the Flathead Valley for more than six years, and across the state for many more years. We support Intermountain's application for federal dollars to expand their services to children and families in the Flathead through the building of a new service center here. We also recognize the significant federal investment and natural and economic resources that are part of the National US Fish and Wildlife Service Refuge System and more specifically the Blasdel Waterfowl Protection Area (WPA) and the need to protect these.

In review of the EA we have come to the position and have provided comments that support moving the location of the proposed center away from the border of the Blasdel WPA. Moving the center closer to the northern edge of the property would provide the increased buffer needed to avoid unnecessary impacts to the natural/wildlife and economic resources of the Blasdel WPA. It would also better address potential safety concerns for both the Intermountain facility and hunters

and their rights in using the WPA. And it would provide a sounder basis for the protection of the investment of considerable federal dollars already made and committed to the Blasdel WPA refuge by the US Federal Fish and Wildlife Service.

Investment of new federal dollars in this region should not undermine the value of existing federal programs and facilities, as are found at the Blasdel WPA. Moving the location of the Intermountain facility for children and families, and any future expansion or events to be held on the site to the northern portion of the property should serve to remove this potential conflict.

1. The EA for the Intermountain's Providence Home is inadequate as drafted because it fails to consider significant cumulative impacts as required by NEPA, MEPA, and the questions posed in the EA.

The EA states: "Note that this Environmental Assessment is prepared for one (1) nine-bedroom facility and associated access, parking, landscaping and site development for which CDBG funding has been requested. Future plans for the subject property by Intermountain Deaconess Home for Children are not included in this review. Early versions of the Intermountain Master Plan site plan that were made available to the public showed multiple structures in the future for the subject property and parking for 300-400 cars for occasional events. This EA has been prepared based on the impacts of one (1) nine-bedroom facility, paved driveway, parking area for 23 cars, landscaping and development location shown on the site plan shown at the end of Appendix A. " 2.M-4

Question #8 of the EA requires "Evaluation of impact, **including cumulative and secondary impacts, on the Physical Environment** " Question #9 of the EA requires "Evaluation of impact, **including cumulative and secondary impacts, on the Human Population** in the area to be affected by the proposed action."

The National Environmental Policy act, as affirmed in the links provided below, clearly require consideration of cumulative impacts when federal funds are to be used as is the case in this application.

<http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf>

http://www.ch2m.com/corporate/services/environmental_management_and_planning/assets/Abstracts/2011/CH2M-HILL-NEPA-Cumulative-Effects.pdf

The Montana Environmental Policy Act, as affirmed in the links below also clearly requires consideration of cumulative impact when state action are taken as in the case of action on this application.

<http://leg.mt.gov/content/Publications/Environmental/2013-mepa-handbook.pdf>

"MEPA was purposeful in establishing a process whereby Montana can anticipate

and prevent unexamined, unintended, and unwanted consequences rather than continuing to stumble into circumstances or cumulative crises that the state can only react to and mitigate. Again, simply expressed in country vernacular, "An ounce of prevention is worth a pound of cure."

Conclusion:

PER 24 CFR 58.47 the EA should be re-evaluated because the cumulative impacts of future expansion of the facility, including adding additional dorms and facilities as called for or suggested in the master plan for the facility, and the disclosure, but lack of analysis, that other events which may be held at the site that would require, as stated in the information provided, the space for the parking of 300 to 400 cars. These omissions are substantial changes in the nature, magnitude and extent of the project, which were not adequately reviewed as required under state and federal law in the original scope of the project in the EA and thus were also not were not anticipated by the public for comment. Those preparing the EA incorrectly limited their analysis to a nine bed facility, when the federal funding provided will allow the establishment of a first phase of development, which provides the foundation for future expansion and sets a project location that can generate additional and significant impacts as build out occurs, particularly to the Federal Protect Waterfowl Protection Area when these potential impacts are not evaluated before the first phase of the site location is finalized.

Additionally, the applicant's environmental review record for the project indicates omission of a required finding [consideration and review of cumulative impacts], applicable to the project in the environmental review process.

These objections are prepared and submitted in accordance with the required procedures (24CFR Part 58).

2. The EA for the Intermountain's Providence Home is inadequate as drafted because it fails to meaningfully consider significant impacts to the physical or human environment of the proposed structure location.

The proposed site for the Intermountain Providence Home has been proposed on the southwest corner of the 75-acre site providing only a 100- to 150-foot buffer from the Blasdel WPA. This site choice will also likely influence future expansion of facilities or hosting of events at the facility, but these factors as noted previously were incorrectly not considered in the EA. The facility could, however, be located anywhere on the 75-acre property, which is currently in agricultural use. No alternative sites were reviewed in the EA, as they should have been. Consideration for an increased buffer was dismissed as not being required for the proposed site due to a conclusion that there would be no "significant impacts to the physical or human environment of the proposed structure location." This conclusion was not supported as required with any research or review of scientific literature on wildlife buffers.

Extensive scientific review and discussion of buffer distances for wildlife in Montana is contained in the report prepared for the Montana Department of Environmental

Quality entitled *Scientific Recommendations on the Size of Stream Vegetated Buffers Needed to Protect Wildlife and Wildlife Habitat*, which provides guidance of the need for setbacks for wildlife dependent on wetlands or watercourses. (A link for this paper and its research is provided and requested that it be made part of this hearing record.) **In general a minimum 300 foot setback is justified, and more specific guidance is provided for individual species found in Montana.**

“Riparian areas and wetlands make up approximately 4% of the Montana’s landscape—yet about one-third of our wildlife species depend upon these areas for some part of their life cycle (Montana’s Comprehensive Fish and Wildlife Conservation Strategy [MCFWCS], 2005). Unplanned commercial and residential development can cause significant, permanent loss and degradation of this critical wildlife habitat.” P.4

“Riparian areas make up approximately 3% of the state’s landscape; wetlands make up almost 1% of the state. Together, this small piece of Montana supports the habitat required to sustain an incredible number of species” p.4

“Montana’s riparian areas and wetlands provide breeding and nesting areas for at least 52% of Montana’s breeding bird species (134 of Montana’s 259 breeding birds) (Montana Audubon, unpublished data, 2006).” P.4

“Scientific studies recommend that, in order to protect wildlife and wildlife habitat, 300-foot (100-meter) stream vegetated buffers be maintained. Certain wildlife species need a larger vegetated buffer. This recommendation is drawn from the conclusions of 6 publications that reviewed a total of 83 separate scientific studies on wildlife, wildlife habitat, and stream vegetated buffers.” P.7

http://www.mtaudubon.org/issues/wetlands/documents/Science%20Series/MA_Science_Setback_Wildlife_2008.pdf

Additionally a review of concerns and need for generous setbacks from hunting areas is found at the Montana Fish Wildlife and Parks web site below and in Appendix Pages C47–C53: (This link is provided and it is requested that this research can be made part of this hearing record.)

<http://fwp.mt.gov/fishAndWildlife/livingWithWildlife/buildingWithWildlife/subdivisionRecommendations/documents.html>

“New subdivisions in an area where hunting has traditionally occurred can negatively impact hunters, wildlife, and wildlife habitat; in turn, hunting in close proximity to new subdivisions can negatively impact the residents.” P. C47

“Subdivision residents living near a river and its associated sloughs and wetlands may encounter and object to lawful waterfowl hunting and the associated discharge of shotguns from a half hour before sunrise through sunset, during the season, which can run from September into January.”

"Wildlife professionals with resource management agencies want the public to understand that, besides being a legitimate and closely regulated activity, hunting and trapping are also important wildlife management tools that help them maintain healthy ecosystems and wildlife populations. Professionally managed hunting and trapping are key tools helping them achieve an acceptable balance between wildlife populations and human tolerance for the problems sometimes caused by wildlife" (IAFWA 2005)."P.C50

"The projectile range of firearms varies from less than one mile to more than five miles (FWP website 2012). Besides the fact that bullets and pellets may travel a significant distance beyond the boundaries of an area where hunting occurs, there are noise and other factors that may be perceived to conflict with residential land use." P. C50

"FWP Region 1, Kalispell area. "... The entire WPA (Waterfowl Production Area, located adjacent to this particular proposed subdivision) is open to rifle and shotgun hunting during the legal hunting seasons ... Placing development or trails within approximately 300 feet of the public land boundary puts these people or homes at risk of being impacted by shotgun fire ... None of the [proposed] buffers are adequate to completely mitigate use of a rifle for hunting. There is little or no forest or other vegetation or topography that would deter bullets if discharged towards the development. This presents a clear risk to public safety within the proposed development or raises the question of whether the area within a mile of the development can continue to be hunted using rifles ... If the development is built, hunters' ability to hunt portions of the WPA in a responsible manner will be limited" (FWP 2008, p. 5)." P. C51

"In nearly all cases, Montana state law prohibits the hunting of game animals or game birds "on, from, or across any public highway or the shoulder, berm, or barrow pit right-of-way of any public highway, defined in 61-1-101, in the state"³ (MCA 2010). Arizona state law prohibits "the discharge of a firearm while taking wildlife within one-fourth mile of an occupied farmhouse or other residence, cabin, lodge, or building without permission of the owner or resident."⁴ Similarly, the Administrative Rules of the Montana Department of Natural Resources and Conservation prohibit the discharge of firearms on state lands within one-quarter mile of an inhabited dwelling or outbuilding without permission of the inhabitant (DNRC 2012)."

The EA states that no record of hunting accidents could be found at the Blasdel WPA. Hunting accidents in Montana are frequent and common, however, and have been documented as a safety issue by many including an account by Tom Donovan, author of "Dying to Hunt in Montana: Two Hundred Years of Hunting Related Fatalities in Montana," written to bring awareness for the increased need for hunter safety and hunter safety training. This book documents a 200-year history of hunting accidents in Montana as a way of raising awareness of the risks issues and need for safety when hunting. Simply not being able to identify a hunting accident at the Blasdel WPA is not a basis for dismissing hunting safety concerns. The research provided within our comments and elsewhere establishes the needs for buffers

from hunting areas. (This link is provided so that this information can be made part of the hearing record. <http://dyingtohunt.com/>)

The State of Montana guidelines for youth homes acknowledge the need to provide a safe environment for children and require fencing or natural barrier to restrict children from hazards, but the EA states the property will not be fenced.

“37.51.901 YOUTH FOSTER HOMES: ENVIRONMENTAL AND SAFETY REQUIREMENTS (14) Any outdoor play area shall be maintained hazard free. If any part of the play area is adjacent to a well, machinery, road, drainage ditch, holes, or other hazardous areas, the play area shall be enclosed with fencing or natural barriers when preschool children are in placement to restrict the children from these areas.”

The Blasdel WPA is part of a national refuge system whose economic benefits should be recognized in this EA and conditions established to conserved these resources. According to a press release by the National Wildlife Refuge Association, “It costs the federal government just \$3.28 per acre to manage our nation’s Refuge System, but the Refuge System generates \$975 for every \$1 appropriated for refuges. That’s an 850 percent increase in the original investment”, he said. “This proves that our national wildlife refuges, along with other conservation efforts, are some of the best investments in the world.” <http://www.refugenet.org/new-publications/2011/10-14-11.html>

The US Fish and Wildlife Service recently released a new report and vision for conservation of the refuge system that provides additional justification for expanded analysis in the EA and the need to establish mitigation requirements that move the proposed building site significantly away from the boundary of the WPA. “The culmination of a year-long process to create an updated plan for the National Wildlife Refuge System, *Conserving the Future*, acknowledges growing conservation challenges like habitat fragmentation, the need for adequate quantities of clean water, the explosion of invasive species, impacts of climate change, and rapidly shifting public demographics, and lays out a detailed plan of action. In recognizing that habitat fragmentation poses the greatest challenge to wildlife conservation, the plan makes clear the need for national wildlife refuges to work “beyond the boundaries,” seeking out creative alliances with adjacent landowners, states, and other federal agencies in crafting large landscape strategies. With scarce federal and state funds, the plan emphasizes leverage and community support to realize larger conservation results.” <http://www.refugenet.org/new-publications/2011/10-20-11.html> (Please also make the report “*Conserving the Future: Wildlife Refuges and the Next Generation*” <http://americaswildlife.org/vision/> part of this hearing record)

The following executive order for which consideration in this decision is required is, *Executive Order 11990—Protection of Wetlands Source: The*

provisions of Executive Order 11990 of May 24, 1977, appear at 42 FR 26961, 3 CFR, 1977 Comp., p. 121, unless otherwise noted. This order states and provides additional basis for the need for mitigation and relocation of the proposed group home site:

“Sec. 5. In carrying out the activities described in Section 1 of this Order, each agency shall consider factors relevant to a proposal's effect on the survival and quality of the wetlands. Among these factors are:

- (a) public health, safety, and welfare, including water supply, quality, recharge and discharge; pollution; flood and storm hazards; and sediment and erosion;
- (b) maintenance of natural systems, including conservation and long term productivity of existing flora and fauna, species and habitat diversity and stability, hydrologic utility, fish, wildlife, timber, and food and fiber resources; and
- (c) other uses of wetlands in the public interest, including recreational, scientific, and cultural uses.”

<http://www.archives.gov/federal-register/codification/executiveorder/11990.html>

Conclusion:

PER 24 CFR 58.47 the EA should be re-evaluated because the conclusion reached was not based on currently available research and science in its conclusion that there would be no significant impacts to the physical or human environment of the proposed structure location. Analysis of commonly available research on setbacks and buffers for wildlife and wetlands, and setbacks and buffers for hunting safety, should make evident substantial changes in the nature, magnitude and extent of the project, which were not adequately reviewed as required under state and federal law in the original scope of the project in the EA, and which were not anticipated by the public due to the lack of review of this research in the EA. Those preparing the EA incorrectly limited their analysis too narrowly to a discussion of if the applicant would object to the potential site location impacts from hunting on the WPA, and failed to adequately evaluate actions the applicant could and should take to limit its negative impact on the natural resources and federal and state dollars that have been invested in the WPA as a valuable public wildlife and hunting resource. The safety and wellbeing of the home's resident children who have been exposed to trauma is also a concern deserving of additional consideration given the potential impacts hunting noise can have on sleeping children.

Additionally, the applicant's environmental review record for the project indicates omission of a required finding [consideration and review of extensive scientific research on the value and importance of adequate buffers to protect and maintain wildlife resources and hunting rights within the WPA], applicable to the project in the environmental review process.

These objections are prepared and submitted in accordance with the required procedures (24CFR Part 58)

3. The size of the proposed facility is represented differently in the materials made available to the public and the hearing record, making needed consideration of impacts difficult to impossible. The size of the facility has been

represented as ranging in size from 8 beds to as high as 12 beds, to a future development with multiple dorms. The EA states it is only evaluating the impacts of a 9-bed facility.

“Note that this Environmental Assessment is prepared for one (1) nine-bedroom facility and associated access, parking, landscaping and site development for which CDBG funding has been requested. Future plans for the subject property by Intermountain Deaconess Home for Children are not included in this review. Early versions of the Intermountain Master Plan site plan that were made available to the public showed multiple structures in the future for the subject property and parking for 300-400 cars for occasional events. This EA has been prepared based on the impacts of one (1) nine-bedroom facility, paved driveway, parking area for 23 cars, landscaping and development location shown on the site plan shown at the end of Appendix A. “ 2.M-4

As asserted earlier in these comments, limiting the scope of the EA to only the potential impacts of a 9-bedroom facility and not including and evaluating the nature, timing and potential impacts of future expansions and events that would need parking for 300 to 400 cars is without merit. The EA should include analysis of future build out, additional detail on the future water, septic, and storm water systems proposed to serve this scale of development and the possible cumulative impacts of such development. In addition to impact of the proposed building location within 100 to 150 feet of the WPA as proposed, the future plans for the facility are needed to evaluate well, septic, and storm water design impacts in an area of shallow ground water and in an area that sits in a 500-year flood plain. Additionally, we understand that the wetland complex of the WPA is a groundwater dependent system and that is and may be further impacted by cumulative development impacts in the area, but the EA provides no analysis of this issue.

Finally, while there are approval processes for septic systems outside of this EA as the applicant noted in the quote below from the EA, the purpose of the EA is to determine if given the overall specifics of the proposal and related impacts, if mitigations are needed to the proposed development. Such consideration should be included in the EA and not assumed they will be addressed in other approval processes. Also the EA did not provide information or an analysis of transportation impacts. These should be reviewed with consideration given to future build outs. As events are proposed which would attract 300 to 400 cars for parking, these transportation and parking impacts should also be explained and analyzed.

“According to materials supplied by Intermountain, the proposed development will be a 9-bedroom home that will serve up to 17 children. According to the Flathead City/County Environmental Health Department, with supervisory staff as well as visitors, it is reasonable to assume that the wastewater system will be designed as a “public” system because it may accommodate more than 24 persons at any given time throughout the year. Final determination on septic size will be made by a licensed engineer. Regardless of the size of facility that is designed to serve the proposed development, it will need to be reviewed, approved and permitted by the Flathead City/County Health Department as a new system, compliant with current

standards. As a result, adequacy of size of the system, the drainfield of the system, and the impacts to groundwater will all be reviewed. " 2m-25

Conclusion:

PER 24 CFR 58.47 the EA should be re-evaluated because the conclusion reached did not include necessary information on the well, septic, and storm water design impacts in an area of shallow ground water and in an area that sits in a 500 year flood plain. Additionally, the wetland complex of the WPA is a groundwater dependent system and there is concern that this groundwater system is, and may be further impacted by, cumulative development impacts in the area, but the EA provides no analysis of this issue. Analysis of this information should make evident substantial changes in the nature, magnitude and extent of the project, which were not adequately reviewed as required under state and federal law in the original scope of the project in the EA, and which were not anticipated by the public due to the lack of review of this research in the EA.

Additionally, the applicant's environmental review record for the project indicates omission of required findings [comprehensive consideration and review of systems related to well, septic, storm water, as related to their design and location on the border of the WPA, in an area of shallow groundwater, in an area of 500 year flood occurrence, and within an area where adjoining wetland complexes of the WPA are groundwater dependent], applicable to the project in the environmental review process.

These objections are prepared and submitted in accordance with the required procedures (24CFR Part 58)

4. Finally we would like to note our concern that Flathead County has chosen not to respond as directed in a letter of October 21, 2013 from Jenifer Olson of the Department of Commerce Community Development Division directing that the county provide written comment to questions raised by Deborah Soukup with in 15 days of the receipt of the letter. I contacted BJ Grieve and requested the county's response to Ms Soukup and was informed that the county had decided not to comment to Ms Soukup's letter until all public comment had been received. We object to this delay as a response to this letter would have allowed us to consider the county's responses in preparation of our comments. Furthermore we believe it should be the policy of the county and the Department of Commerce to ensure that timely requests are make to requests for information.

§58.76 Procedure for objections.

A person or agency objecting to a responsible entity's RROF and certification shall submit objections in writing to HUD (or the State). The objections shall:

(a) Include the name, address and telephone number of the person or agency submitting the objection, and be signed by the person or authorized official of an agency.

Citizens for a Better Flathead
PO Box 771
Kalispell, MT 59903
Phone: 406-756-8993



Signed by Mayre Flowers, Executive Director

(b) Be dated when signed.

1-6-2014

Date Signed

(c) Describe the basis for objection and the facts or legal authority supporting the objection.

See Text of Comments pages 1 to 10

(d) State when a copy of the objection was mailed or delivered to the responsible entity's Certifying Officer.

1-6-2014

Date Copy mailed or delivered

Debbie Pierson

From: Elaine Nelson
Sent: Monday, January 06, 2014 8:58 AM
To: Debbie Pierson
Subject: FW: Intermountain

From: Debra Soukup [<mailto:debisoukup@gmail.com>]
Sent: Monday, January 06, 2014 8:57 AM
To: Elaine Nelson
Subject: Intermountain

Regarding the Release of Funds for Intermountain CDBG, (being unable to stand in front of a room of strangers and speak), i am, instead, bringing in documentation and a letter addressing why i believe the request should not move forward. i believe it is a travesty of extreme proportion, and ultimately an attack on the very fabric of a sleepy, unsuspecting neighborhood in your care.

Debi Soukup
899 North Somers Road
Kalispell, MT 59901

P.O. Box 28
Somers, MT 59932

RECEIVED

JAN 07 2014

FLATHEAD COUNTY
COMMISSIONERS

a.m.
8:11

Jan 6, 2014

Commissioners

I am requesting you hold off
on Request for Release of Funds
for Intermountain CDIBG.

I have documented here the
numerous reasons why. The
biggest being the total misrep-
resentation as to where this was
taking place. The actual public
being impacted never heard
about it.

I have never requested Intermountain
not receive the funds. I have
only asked that the directives
and conditions of the grant
be adhered to.

Instead, the representatives of the
county chose to TAKE access to
public lands, TAKE hunting rights,
TAKE Lower Valleys right to be
involved. They chose to ignore
their own promises (documented)
and put a wetland at risk.

Most of which could be easily
"mitigated" if Intermountain

would simply utilize their own
76 acres and choose a different
building site.

I came into this thinking a simple
error had been made. Thinking a
bunch of people who sit at desks
all day and being from Helena
had no idea what they were doing.
Thinking everybody involved
(after all, NPO's are "good" people)
and still having a modicum of
faith in at least the county level
of government, would all have the
integrity to want to do things
openly, honestly and accurately.
Living up to and meeting ALL the
conditions and requirements contained
in the grant. Apparently I was wrong.

The county and Intermountain's
insistence they do what they want
and show of force by TAKING
from others to achieve what they
want does not reflect well on any
of you.

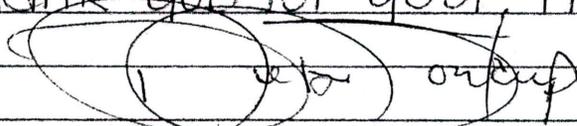
Now I'm wondering if this is more
a zoning (issue) opportunity, being
used by the county in a tax
land-grab. Personally - I'll be

taxed right out of my home. The neighborhood won't be able to question any of it because it ~~is~~ will have already occurred. Rural changed to urban, overnight. Zero neighborhood awareness let alone involvement.

What really hurts: My taxes being used to Increase my taxes. My taxes being used by a business for its own capital improvements. My taxes being used to TAKE and destroy. The biggest insult of all: this "business" does not have to pay its full share of the burden of taxes the rest of us pay.

Again, I am pleading with you, Do the right thing and hold off on Request for Release of Funds for Intermountain's CDBG until ALL requirements and conditions contained within said grant can be met.

Thank you for your time



Debi Soukup

P.O. Box 28

Somers, MT 59932

Debi Soukup
P.O. Box 28
Somers, MT 59932

Flathead County Board of Commissioners
800 South Main Room 302
Kalispell, MT 59901

I have numerous comments regarding the environmental impact on the human and rural elements, and the adherence to the restraints within the CDBG of Intermountains grant. You even ignore your own growth policy!!!

First I question the very legality of contract/application submitted by you to the State. Primarily the intent of the CDBG is: urban development and renewal. The area being impacted is a stable rural neighborhood, in absolutely no need of renewal or desire to be developed into something that's "urban".

The continual visual and verbal referral to the property being developed as being in Somers. It is legally defined as being in Kalispell. Just because the final EA has begun to refer to its true location in Kalispell does not alter the fact that it was initially approved using erroneous information.

The constraint of not changing historical use. This is a single family agricultural area, in addition to a wetland district, complete with hunters. The new EA says it's okay to force the hunters off this area of the Blasdell WPA. Excuse me? No adherence to the historical use condition.

The restriction of allowing a group home in a single family area on condition that it is 8 beds or less, I see the new EA changed it to 9 beds, however that still doesn't comply with the HUD restriction and the state definition of single family.

The requirement of 2 roads ingress to the project, there aren't 2 roads ingress to this property, it is completely surrounded by private property and the 535 acre Blasdell WPA. Or does the county intend to confiscate private roads to meet this requirement?

The constraint of Fish and Wildlife Coordination Act: equal consideration of wildlife and water resources. This project has already impacted the wildlife and will further impact not only the wildlife but the water resource of Blasdell Waterfowl Production Area. The act of changing the wording of the description of the soil in the new EA doesn't change the amount of impact to Blasdell WPA or the wetland. Water still runs downhill and still doesn't respect property lines. And please, can you explain to me how soil changes from: late and slow drying with severe limitations based on water holding capacity to: moderately well drained to well drained????? I guess a million years went by when I wasn't looking?

All government agencies being informed: I personally had to inform Sheriff Curry, the NW MT Wetland Management District, and Somers School. This was supposed to be done prior to awarding the CDBG. Whether a new EA is done or not, the government agencies weren't informed prior to awarding the CDBG.

Does serving .0005% constitute being called a public facility?

As far as informing humans living in/around the project area: the public hearing announcement mislead anybody living in the area being impacted by stating it was in Somers. Regardless of the new EA, the public was still misinformed prior to awarding this CDBG.

In summary, since it's been shown that Intermountain has no intention of addressing or even

attempting to mitigate any of these things, (with 76 acres available to them to accomplish it), and Flathead County isn't going to keep them legal, (which is your job as administrators), I believe the entire project needs to be stopped immediately and am communicating the same thing to Gus Byrom. Using new words and new descriptions, more words and more descriptions in a new and updated EA, does not change the fact that this grant was awarded to Flathead County and Intermountain without correct information.

Comments on the Final EA itself:

Environmental Assessment

Physical Environment

1. re: item 1: the area is generally flat, however it contains a dry riverbed that feeds directly into Blasdel WPA, the soils have severe limitations due to water holding capacity. I see that's been changed in the recently published EA. The soil is now moderate to well drained. How does that happen in less than a year?
2. re: item 5: this is not a small footprint, the sheer scope of the drain field needed for a community based drain field big enough to serve this high density business and the impact on wetlands is totally contrary to defined limitations. Have no impact on historical use and equal consideration to wetlands. Just look at your own site plans!!!!
3. Re: item 7: the sheer denial of any impact because quote: the wetland is on "adjacent property" Excuse me? Does that mean that a property line stops the drainage generated? It no longer takes an "expert" to know water runoff from parking lots happens, complete with gas and oil residue.
4. Re: item 9: states it is unlikely to substantially alter the habitats of wildlife. Again, actions taken by Intermountain immediately upon receiving word the grant was awarded have driven hundreds of geese off their fall gathering and training grounds. I would call that a substantial alteration. (Geese are waterfowl) Further impacting Blasdel WPA.

Human Population

1. Re: item 2: states it is unlikely to create nuisances, I'm wondering what level of nuisance the funnelling of 5 counties of deviants into this rural area will create. The need for a police presence would indicate slightly more than nuisance, don't you think? Further the statement that traffic will be limited is questionable due to the movement of so many employees, children being transported to numerous schools, medical, psychiatric and court hearings, parents coming for therapy and visits, indicates far more than limited traffic.
2. Re: item 3: states not adjacent to airports, yet there is a private airport adjacent to the proposed project that generates a lot of airplanes flying around and over project area. Visiting guests flying in, practice runs of landing and take-off, multiple planes during any nice weather. Was any physical count ever done?
3. Re: item 5: no detrimental impact to population characteristics. The population in the subject area is single family with children, elderly and farmers. Funnelling deviants from 5 counties on the restricted roads in this area has a high potential for impacting the residential population. Not to mention the impact on residential children attending the schools that will be used by these children, who, according to the application tend to: act out. Additionally the area is defined as rural: CDBG prime directive is Urban

Renewal.

4. Re: item 6: is this only the environmental justice for the project, or is the area being impacted also to be considered for "environmental justice"? According to the site plans, only the business gets environmental justice.
5. Re: item 9: What exactly is the definition of "unacceptably high" deleterious impact? When does any health, and particularly safety, impact become acceptable? Especially in such a currently stable area. One NEVER reads about the lower valley in the daily police roundup published in the Daily Interlake. The importing of 5 counties of horribly deviant adults into and through the area will increase crime. It really shouldn't require an "expert" opinion, "Build it and they will come". Additionally the public health, in particular the mental health of the residents of the development, being placed immediately on the property line of Blasdell WPA which is used constantly by hunters during the hunting season, what are they going to experience when hearing guns going off? Regardless of what John Paul Noyes (one neighbor) who lives where in relation to Blasdell WPA? Yes, 1000 ft away, but in an area of the WPA used by hunters? If this WPA is so beneficial for the project residents to use as recreation, how is it the neighboring residents have need for a buffer from it? It's either a good thing or it's a bad thing, and if the neighbors need a buffer, wouldn't the project residents need a buffer? Specifically a "buffer" of more than 150 feet. Additionally the shallow groundwater, adjacent to (and part of) surface water wetlands, with a project of this size, will absolutely have impact on the wetlands. It shouldn't take an "expert" opinion to know: property lines don't stop water moving downhill.
6. Re: item 11: there is negligible beneficial impact for local employment.
7. Re: item 12: Do NPO's even pay property taxes? So how can changing this from hayfield to a light industrial compound going to benefit anybody but the business itself as far as finances? We the taxpayers are already bearing the burden of 76 acres prime real estate ~~being removed~~ from the tax base. So the only higher revenue-generating land use benefits will go directly into the pocket of one private business. How will this add to payroll taxes, this business is tax exempt.
8. Re: item 13: SOME children, MAY be moved to Somers School, how about all the children brought in from outlying school districts? Why was the first time Somers school heard about this was when I called them in January 2013? And what will the impact of children who have the potential of acting out sexually be on the resident children attending those schools?
9. Re: item 14: Of course the development being proposed won't impact commercial or industrial facilities because there currently aren't any!!! This is a rural, single family agricultural district!!! This is a CDBG being used for the benefit of the growth of one business.
10. Re: both items 15 & 16: There may be little impact on the residents ability to access these services, but what about the taxes needed to support them when 4 outlying counties children being brought in will be accessing them? Will Flathead residents shoulder the tax burden of other counties fiduciary responsibilities to their own children?
11. Re: item 17: How can it be stated there would be no impact on the social norms or conventions on this area with the importing of these parents for supervised visitation and family therapy, funnelled onto the roads in the area, and the impact on the behavior

correction:
not carrying
their COMPLETE
share in
paying
county taxes

- of resident children in the schools? The children being served may not have criminal records but the parents do, and the children do have behavior problems which will be experienced directly by the resident children attending the schools.
12. Re: item 18: this question was not answered at all, this is a serious land use change, serious development activity change, and the potential conflicts have only been scratched on the surface with all of the above. This is a low density, single family residential, agricultural area being socially re-engineered into industrial. The development cannot "create" a large lot buffer, it already is a large lot buffer. Why and from what do the neighboring residents need buffering other than the proposed project? It's stated here, that the Blasdel WPA, which is SO beneficial to the project residents is actually so bad the surrounding residential lots need to be buffered from it....which is it? The size of the Blasdel WPA is not 80-160 acres, it is actually 535 acres.
 13. Re: item 19: Will any of this wastewater treatment system being installed take into consideration more than the legal description of a public system, or will the immediate impact on the wetland directly bordering the proposed project site be considered?
 14. Re: item 24: The only police presence in this area is the Sheriff Department, which only has 6 persons on any given shift who are responsible for 5,000 sq. miles.
 15. Re: item 28: it cannot be stated there will be no impact on bordering privately owned parcels, they will see a loss of property value with this industrial buildup in a residential area.
 16. Re: item 29: the use of "a congregate care facility for the elderly" as a surrogate for automobile traffic generation cannot be called reasonable. This industrial buildup is for children, elderly don't go to schools, they are not in the middle of legal battles between the state and the parents, a facility for the elderly doesn't include family therapy, visitation, nor does it generate the numerous trips generated by all the attenuating office staff for an industrial buildup of this size or scope. What is the exact definition of airport runway clear zones, and who came up with the idea that the local airport is used infrequently? It is utilized year round, but most extensively in the warmer months, and it generates a lot of air traffic, regardless of what John Paul Noyes states. Is each and every flight logged with him? When they spend an hour practicing landing techniques is it logged with him? Does he live over here next to the project site and know for a fact it won't be "loud or noisy"? If you can take his word for it, why is mine so disregarded?

Debi Soukup
P.O. Box 28
Somers, MT 59932

cc: Gus Byrom

Flathead County
Board of Commissioners

(406) 758-5503



Pamela J. Holmquist
Gary D. Krueger
Calvin L. Scott

January 15, 2014

John Vore, Wildlife Biologist
Montana Fish, Wildlife & Parks
Region 1 Headquarters
490 North Meridian Road
Kalispell, MT 59901

Dear Mr. Vore,

On behalf of the Flathead County Board of Commissioners, I would like to thank you for your interest and comments related to the Environmental Assessment (EA) for the Intermountain Providence Home Project.

As you are aware, Flathead County was awarded a \$450,000 federal grant to support the construction of the proposed Intermountain therapeutic youth home near Somers. Notification was published that a Request for Release of Funds (RROF) would be submitted to the Montana Department of Commerce/Community Development Block Grant (CDBG) program following the close of the EA public comment period. Based on the comments received, and on recommendation from B. J. Grieve, Flathead County Environmental Certifying Officer, we have opted to temporarily suspend our request for release of funds to the Department of Commerce.

Information submitted during the EA public comment period will be thoroughly reviewed and additional research will be conducted to address relevant concerns. We value your involvement in the process and appreciate the time you have invested to ensure the environmental review is complete and thorough. As an interested party, you will be contacted directly with future updates on the EA process.

Sincerely,
OFFICE OF FLATHEAD COUNTY
BOARD OF COMMISSIONERS


Mike Pence, County Administrator

C: Jennifer Olson, MDOC Community Development Division Grants Bureau Chief
Gus Byrom, MDOC Community Development Division, Housing & Public Facilities
Program Manager
Jim Fitzgerald, Intermountain
Debbie Pierson, Flathead County Grant Administrator

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

7004 1160 0006 9660 1324

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To **JOHN VORE MT FISH WILDLIFE & PARKS**
 Street, Apt. No., or PO Box No. **490 N MERIDIAN ROAD**
 City, State, ZIP+4 **KALISPELL MT 59901**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**JOHN VORE
 MT FISH WILDLIFE & PARKS
 REGION 1 HEADQUARTERS
 490 N MERIDIAN ROAD
 KALISPELL MT 59901**

COMPLETE THIS SECTION OF DELIVERY

A. Signature *X-K R... [Signature]* Agent Addressee

B. Received by (Printed Name) _____ C. Date of Delivery **1-21**

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Article Number
 (Transfer from service label) **70041160000696601324**

Form **3811**, August 2001 Domestic Return Receipt

Flathead County
Board of Commissioners

(406) 758-5503



Pamela J. Holmquist
Gary D. Krueger
Calvin L. Scott

January 15, 2014

Greg McCormick, President
Robin Steinkraus, Executive Director
Flathead Lakers
P. O. Box 70
Polson, MT 59860

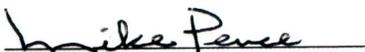
Dear Mr. McCormick and Ms. Steinkraus,

On behalf of the Flathead County Board of Commissioners, I would like to thank you for your interest and comments related to the Environmental Assessment (EA) for the Intermountain Providence Home Project.

As you are aware, Flathead County was awarded a \$450,000 federal grant to support the construction of the proposed Intermountain therapeutic youth home near Somers. Notification was published that a Request for Release of Funds (RROF) would be submitted to the Montana Department of Commerce/Community Development Block Grant (CDBG) program following the close of the EA public comment period. Based on the comments received, and on recommendation from B. J. Grieve, Flathead County Environmental Certifying Officer, we have opted to temporarily suspend our request for release of funds to the Department of Commerce.

Information submitted during the EA public comment period will be thoroughly reviewed and additional research will be conducted to address relevant concerns. We value your involvement in the process and appreciate the time you have invested to ensure the environmental review is complete and thorough. As an interested party, you will be contacted directly with future updates on the EA process.

Sincerely,
OFFICE OF FLATHEAD COUNTY
BOARD OF COMMISSIONERS


Mike Pence, County Administrator

C: Jennifer Olson, MDOC Community Development Division Grants Bureau Chief
Gus Byrom, MDOC Community Development Division, Housing & Public Facilities
Program Manager
Jim Fitzgerald, Intermountain
Debbie Pierson, Flathead County Grant Administrator

7004 1160 0006 910 1317

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To	FLATHEAD LAKERS
Street, Apt. No.; or PO Box No.	P O BOX 70
City, State, ZIP+4	POLSON MT 59860

PS Form 3800, June 2002

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Karen H Swan</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>GREG MCCORMICK ROBIN STEINKRAUS FLATHEAD LAKERS P O BOX 70 POLSON MT 59860</p>	<p>B. Received by (Printed Name) <i>Karen H Swan</i></p>	<p>C. Date of Delivery <i>1-21-14</i></p>
	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>70041160000696601317</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, 1st 2001 Domestic Return Receipt 102595-02-0000</p>		

Flathead County
Board of Commissioners

(406) 758-5503

Pamela J. Holmquist
Gary D. Krueger
Calvin L. Scott



January 15, 2014

Mayre Flowers, Executive Director
Citizens for a Better Flathead
P. O. Box 771
Kalispell, MT 59903

Dear Ms. Flowers,

On behalf of the Flathead County Board of Commissioners, I would like to thank you for your interest and comments related to the Environmental Assessment (EA) for the Intermountain Providence Home Project.

As you are aware, Flathead County was awarded a \$450,000 federal grant to support the construction of the proposed Intermountain therapeutic youth home near Somers. Notification was published that a Request for Release of Funds (RROF) would be submitted to the Montana Department of Commerce/Community Development Block Grant (CDBG) program following the close of the EA public comment period. Based on the comments received, and on recommendation from B. J. Grieve, Flathead County Environmental Certifying Officer, we have opted to temporarily suspend our request for release of funds to the Department of Commerce.

Information submitted during the EA public comment period will be thoroughly reviewed and additional research will be conducted to address relevant concerns. We value your involvement in the process and appreciate the time you have invested to ensure the environmental review is complete and thorough. As an interested party, you will be contacted directly with future updates on the EA process.

Sincerely,
OFFICE OF FLATHEAD COUNTY
BOARD OF COMMISSIONERS


Mike Pence, County Administrator

C: Jennifer Olson, MDOC Community Development Division Grants Bureau Chief
Jim Fitzgerald, Intermountain
Debbie Pierson, Flathead County Grant Administrator

7004 1160 0006 9660 1300

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To **MAYRE FLOWERS CITIZENS BETTER FLATHEAD**
 Street, Apt. No.; or PO Box No. **P O BOX 771**
 City, State, ZIP+4 **KALISPELL MT 59903**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, on the front if space permits.

1. Article Addressed to:

MAYRE FLOWERS
 CITIZENS FOR A BETTER FLATHEAD
 P O BOX 771
 KALISPELL MT 59903

2. Article Number
 (Transfer from service label)

70041160000696601300

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent Addressee
Hilary K Doonan
- B. Received by (Printed Name) *HILARY K DOONAN* C. Date of Delivery *1-21-14*
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No



3. Service Type
- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Flathead County
Board of Commissioners

(406) 758-5503



Pamela J. Holmquist
Gary D. Krueger
Calvin L. Scott

January 15, 2014

Deborah Soukup
P. O. Box 28
Somers, MT 59932

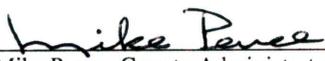
Dear Ms. Soukup,

On behalf of the Flathead County Board of Commissioners, I would like to thank you for your interest and comments related to the Environmental Assessment (EA) for the Intermountain Providence Home Project.

As you are aware, Flathead County was awarded a \$450,000 federal grant to support the construction of the proposed Intermountain therapeutic youth home near Somers. Notification was published that a Request for Release of Funds (RROF) would be submitted to the Montana Department of Commerce/Community Development Block Grant (CDBG) program following the close of the EA public comment period. Based on the comments received, and on recommendation from B. J. Grieve, Flathead County Environmental Certifying Officer, we have opted to temporarily suspend our request for release of funds to the Department of Commerce.

Information submitted during the EA public comment period will be thoroughly reviewed and additional research will be conducted to address relevant concerns. We value your involvement in the process and appreciate the time you have invested to ensure the environmental review is complete and thorough. As an interested party, you will be contacted directly with future updates on the EA process.

Sincerely,
OFFICE OF FLATHEAD COUNTY
BOARD OF COMMISSIONERS


Mike Pence, County Administrator

C: Jennifer Olson, MDOC Community Development Division Grants Bureau Chief
Gus Byrom, MDOC Community Development Division, Housing & Public Facilities
Program Manager
Jim Fitzgerald, Intermountain
Debbie Pierson, Flathead County Grant Administrator

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

7004 1160 0006 9000 0000 1331

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To **DEBORAH SOUKUP**

Street, Apt. No., or PO Box No. **P O BOX 28**

City, State, ZIP+4 **SOMERS MT 59932**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to: **PLEASE DEBRA**

DEBORAH SOUKUP
P O BOX 28
SOMERS MT 59932

COMPLETE THIS SECTION ON DELIVERY

A. Signature **X1 [Signature]** Agent Addressee

B. Received by (Printed Name) **[Signature]** C. Date of Delivery **1/21/14**

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Transfer from service label) **70041160000696601331**

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540