

Appendix E

Cumulative Impact Analysis

Appendix E – Cumulative Impact Analysis

Cumulative impacts are the summation of impacts on a resource resulting from the incremental impact of the proposed project when added to other past, present, or reasonably foreseeable future actions regardless of the actions' originator. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Cumulative impact analysis considers connected actions, projects related and dependent upon the completion of the proposed development of Providence Home, and similar actions or projects having a common geography or timing that provide a basis for considering their impact together with impacts related to the proposed development of Providence Home.

Cumulative impacts are evaluated on past actions, present actions, and reasonably foreseeable actions. Due to the limited availability of information regarding past actions, this portion of the analysis is limited to aerial photograph interpretation and the current land use on the subject property. Present actions are those projects which are ongoing and will continue during the implementation of the proposed project. Reasonably foreseeable actions, for the purposes of this project, are those that have received local approval for implementation within a 1-mile radius of the subject property. Additionally, reasonable foreseeable actions will include the Providence Home providing accommodation for up to 12 children beyond the current licensing cap for any single therapeutic youth group home at eight children. Montana Environmental Policy Act explicitly includes only such future actions as “are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluations, or permit processing procedures.”

Speculative future use for the subject property is not considered reasonably foreseeable as part of this analysis. As stated in the letter (February 26, 2014) written by Intermountain to the Flathead County Commissioners:

“It is also important to clarify that aside from Providence Home, Intermountain’s Board of Directors has no identifiable plans for additional future development on its 75-acre property. This project has evolved from the original preliminary architectural report (PAR) in September 2011 to current design documents. The original PAR called for an emergency shelter with a capacity of up to 17 children. However, due to requests from local officials and documented demand for a higher level of residential treatment for children and youth in the Flathead Valley, the current design of Providence Home is for a smaller therapeutic youth group home. This allows Intermountain to provide children throughout the Flathead Valley with greater therapeutic care and more enduring outcomes.

Earlier conceptual renderings showed additional structures – such as a schoolhouse and administrative office – and a space that could be used for additional development. However, these early conceptual renderings were created for no other reason than to provide perspective and context regarding how a future “campus” might appear surrounding the current Providence Home project. Intermountain has no plans for development of the property beyond the aforementioned Providence Home.

As the needs and demands of emotionally traumatized children are constantly evolving, it is impossible to state unequivocally that the organization will never add development to its property, but as of right now, the organization has no plan or desire to add additional facilities.”

Past Actions

As discussed in the table provided in Exhibit 2-M, Intermountain currently harvests hay on the subject property and also accommodates the grazing of cattle on a portion of the subject

property. The surrounding properties include rural residential, agricultural, and the Blasdel Waterfowl Production Area. Review of aerial photography from 2004 to 2012 reveal increased rural residential development within a 1-mile radius of the subject property.

Present Actions

Present actions are projects which are ongoing and will continue during the implementation of the proposed project. No projects which are ongoing and will continue during the implementation of the proposed project have been identified.

Foreseeable Future Actions

Reasonably foreseeable actions, for the purposes of this project, are those that have received local approval for implementation within a 1-mile radius of the subject property. B.J. Grieve, Planning Director of Flathead County, was contacted on March 19, 2014 to inquire about any projects that have received approval for implementation. Mr. Grieve provided the following comments (see Appendix B for communication records):

- The subject property is unzoned, and the entire Lower Valley area is largely unzoned with the exception of an AG-20 district approximately .5 mile southeast of the subject property. In unzoned areas, there are no restrictions on land uses, nor are there any permits needed for zoning compliance of conditional uses. Therefore our office has no way to track future developments or changes of land use designations. In the area zoned AG-20, we do not currently have any land use applications pending, nor are we aware of any land use changes.
- As far as subdivision of land, our office reviews major and minor subdivisions. We do not review exemptions from the regulations for family transfers, etc. A preliminary plat is reviewed and approved prior to final plat being granted. There are obviously existing subdivisions near the subject property, but those are clearly shown on any section maps and the lots exist currently (i.e., they've been through final plat review and approval). There are currently no preliminary plat entitlements existing within a 1-mile radius of the subject property nor are there any subdivision applications pending or having gone through a pre-application conference within 1 mile of the subject property. The nearest recent subdivision is approximately 2 miles north, and the nearest recent project for which we have conducted a pre-application conference is approximately 2 miles west of the subject property.
- There are no lakes that are subject to the Flathead County Lake and Lakeshore Protection Regulations within 1 mile of the subject property.
- Within a 1-mile radius of the subject property, there are areas designated Special Flood Hazard Area (SFHA, also known as 100-year floodplain) that are regulated by the Flathead County Floodplain and Floodway Management Regulations (the subject property is not designated SFHA and therefore is NOT regulated). There are currently no land use applications pending for floodplain development, nor have there been any floodplain permits reviewed within a 1-mile radius of the subject property within the last five years.

Additionally, according to Ovila Byrd, Road and Bridge Supervisor for Flathead County, plans do exist to chip seal North Somers Road during mid-July 2014.

Other than chip sealing North Somers Road during mid-July 2014, future projects planned that have received local approval for implementation have not been identified within a 1-mile radius of the subject property. However, Intermountain has designed Providence Home with additional capacity to accommodate up to 12 children if licensing caps are changed for a single therapeutic youth group home. Resource issues that are appropriate for analysis under a cumulative impact assessment are addressed below. These categories were identified for cumulative impact analysis because of the impacts caused by the proposed project (please note that none of the impacts were found to be significant) or because they were brought up during the public comment period. Much of the discussion contained within the following sections is also reflected within the various impact analyses in the table provided in Exhibit 2-M. The discussions have been consolidated here to summarize the qualitative cumulative impact analysis completed for this project.

Groundwater Resources and Aquifers

Groundwater resources and underlining aquifers will be used to provide a water supply for the proposed project. If the facility is eventually permitted to serve 12 children, more groundwater will be used. The groundwater usage of four additional children would be minimal and would not significantly impact local groundwater resources. However, the well that is described in the Community Water Supply section of Exhibit 2-M will be able to adequately accommodate up to four additional children without alteration and the overall impact of four additional users at the facility would not significantly impact local groundwater resources. Please also refer to the discussion under Public Water Supply, below. No significant cumulative impact to groundwater resources or aquifers was identified during this analysis.

Surface Water/Water Quality, Quantity, and Distribution

Impacts to adjacent surface water due to the use of groundwater on the subject property were brought up during the public comment period. In Exhibit 2-M, the potential of surface water/groundwater interactions with respect to well and septic development on the subject property were evaluated. The result of the evaluation indicated that there would be no reason to anticipate that the use of groundwater on the subject property nor the installation of a septic system would in any way impact the surface water on or near the adjacent property. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, no impacts to surface waters on adjacent properties are anticipated.

Wetlands Protection

Impacts to adjacent surface water due to the use of groundwater on the subject property were brought up during the public comment period. In Exhibit 2-M, the potential of surface water/groundwater interactions with respect to well and septic development were evaluated. The result of the evaluation indicated that there would be no reason to anticipate the use of groundwater on the subject property nor the installation of a septic system would in any way impact the surface water on or near the adjacent property. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, no impacts to wetlands located on adjacent properties would be anticipated.

Vegetation/Wildlife Species and Habitats Including Fish

The subject property is 75 acres, of which only 4.2 acres will be developed. The remaining property will remain open space after construction of the proposed nine-bedroom residential facility. The proposed project will not remove native vegetation or wildlife habitat, as it is currently used as an agricultural field. While wildlife may pass through in incidental numbers,

developing 4.2 acres of a 75 acre property that is currently managed for agricultural purposes will not significantly reduce wildlife habitat in the area.

Based on the limited amount of land that will be impacted, the limited number of species that use the habitat, and the presence of hundreds of acres of prime habitat immediately adjacent to the proposed facility, the risk of impacts from the proposed facility to wildlife habitat is remote. Additionally, the adjacent Blasdel Waterfowl Production Area provides many acres of habitat to any species that may be displaced due to project activities. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, the subject property would not require further structural development and therefore would not cause a negative cumulative impact to vegetation or wildlife species.

General Housing Conditions – Quality and Quantity

The proposed development would provide a new and appropriately designed therapeutic youth group home in order to provide a safe and nurturing environment for distressed children. This is a benefit to the community and would provide a better living condition for the children it serves. The proposed project will have a beneficial impact to distressed children in Flathead County. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, the subject property would increase the number of people that would benefit from quality housing conditions. The potential increase of 4 additional children being served by the Providence Home will not significantly impact the general quality or quantity of housing conditions within the surrounding community.

Human Health

The proposed facility will likely improve human health for those being accommodated by the facility, as it is being developed to care for abused, neglected, and emotionally traumatized and distressed children. The proposed project will benefit distressed children and will have a beneficial impact on human health. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, it would increase the number of people that would experience a beneficial human health impact. The potential increase of 4 additional children being served by the Providence Home will not significantly impact the human health of those living in the surrounding community.

Social Services

According to Adam Jespersen, Intermountain already operates a four-bedroom facility in Flathead County. Therefore, some of the benefactors of Intermountain's services are already utilizing applicable social services. The proposed nine-bedroom facility to serve 8 children will only add another four youths to the total being served currently in Flathead County (the ninth bedroom is reserved for flexibility in room arrangements, since eight children is the maximum allowed by the state of Montana for a single therapeutic youth group home.) Given the relatively small number of children served by the proposed facility, and the existing services being provided within Flathead County, there is no significant change in impacts to social services from the movement of the existing facility to a new nine-bedroom location. However, the proposed facility will be able to safely accommodate more children, and will provide a beneficial impact to those children. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, it would increase the number of people benefiting from social services. The potential increase of 4 additional children being served by the Providence Home will not significantly impact the social services availability of those living in the surrounding community.

Social Structures and Mores (Standards of Social Conduct/Social Conventions)

The proposed facility will help distressed children, increasing their opportunity to adapt to social structures, social conduct and social conventions. Therefore, the proposed project will provide a beneficial impact to the community. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, it would increase the number of people experiencing the opportunity to better adapt to social structures, social conduct and social conventions. The potential increase of 4 additional children being served by the Providence Home will not significantly impact the social structures and mores of the surrounding community.

Wastewater/Sewage Treatment

A septic system has been designed by licensed engineers and approved/permitted by the Flathead City – County Health Department. Please see the Septic Basis of Design Technical Memorandum (February 2014) and the approved septic permit issued by the Flathead City – County Health Department in Appendix C. The septic system complies with applicable design standards as set forth in the Flathead County Sewage Treatment System Design and Construction Standards and the Montana Department of Environmental Quality Design Circular #4. The system is currently designed to accommodate 10 children (though only eight children would be permitted to live in the facility based on current licensing standards) and six staff. If, at some point in the future, Providence Home is licensed to accommodate 12 children, the septic system will need to be designed to accommodate the extra capacity. In order to accommodate 12 children, the septic system would require treatment of an additional 150 gallons per day. Likely this would require a larger septic tank, a larger recirculation tank, and an additional AX20 filter pod. The drainfield would need to be expanded and the non-degradation analysis would need to be revised. The additional capacity to the proposed permitted septic system would need to occur in order to insure the same non-degradation standards will be met for the system and property. These steps will insure that the current and potentially future system will not have a negative impact on groundwater in and around the subject property and the surrounding community.

Community Water Supply

The proposed well site is underlain by a shallow alluvial aquifer which is penetrated by topographic depressions which contain groundwater that is essentially an extension of the water table in the shallow unconfined aquifer. This is likely the source of water in the wetland areas adjacent to the subject property. The shallow aquifer is underlain by a thick layer of fine-grained material, including a high percentage of clayey glacial till, which confines a deep alluvial aquifer and limits vertical movement of groundwater throughout the Flathead Valley. The shallow aquifer, which is the source of water in the wetland areas adjacent to the subject property rests on top of the confining layer which is the boundary limiting the thickness of the shallow aquifer and on which water in the shallow aquifer is perched. The thick confining layer prevents any significant vertical movement of groundwater between the shallow unconfined aquifer and the confined deep alluvial aquifer on a local basis.

The water supply well will be drilled by a licensed well contractor. A water well that pumps at a rate of less than 35 gallons per minute and produces less than 10 acre-feet of water a year does not require a permit for drilling. The well that will be drilled for the water supply of Providence Home will have no detrimental effect on the human population or surrounding surface water. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence Home, no changes to the well would need to take place as the well would adequately be able to serve the needs of up to 12 students and their associated care givers. Using the common

calculation of 100 gallons per person per day for 16 people (assuming 12 students and 4 care givers), the well would average 1.8 acre-feet per year in use, well under 10 acre-feet per year. Additionally, people being served would still be well under Montana Department of Environmental Quality's regulated public water supply system that serves at least 25 persons daily. The potential increase of 4 additional children being served by the Providence Home will not significantly impact the community water supply (in this case the deep groundwater aquifer) of the surrounding community.

Public Safety and Police

The proposed development will provide a benefit to public safety in Flathead County, as it will provide a safe environment for environmentally distressed children and youth to finding healing and restoration. Without the services of Providence Home, emotionally distressed children and youth will most often remain untreated. Not only does this threaten the stability of the child's home and school environments, if left unchecked, these emotional issues greatly increase a child's risk of criminal activity, addiction, suicide, and domestic violence later in life. If licensing caps are changed to allow up to 12 children to be accommodated at the Providence home, then more environmentally distressed children will be treated and better able to deal with emotional issues that could otherwise pose a risk to criminal activity, addiction, suicide, and domestic violence later in life. The potential increase of 4 additional children being served by the Providence Home will not significantly impact public safety within the surrounding community.

This cumulative impact analysis considered connected actions, projects related and dependent upon the completion of the proposed development of Providence Home, and similar actions or projects having a common geography or timing that provide a basis for considering their impact together with impacts related to the proposed development of Providence Home. Few, if any connected actions, related or independent projects were identified for this analysis. No significant cumulative impacts were identified during this analysis.