Department of Health and Environmental Sciences
STATE OF MONTANA HELENA, MONTANA 59601

ENVIRONMENTAL SCIENCES DIVISION
Telephone: 449-3946

A. C. Knight, M.D., F.C.C.P.
Director

OCT 5 1979

Honorable Thomas Judge, Governor, State of Montana, Helena, MT 59601
Honorable Ted Schwinden, Lieutenant Governor, State of Montana, Helena, MT 59601
Department of Community Affairs, Planning Division, Helena, MT 59601
Department of Fish & Game, Ecological Services Division, Helena, MT 59601
Department of Fish & Game, Wildlife Division, Helena, MT 59601
Department of Highways, Engineering Division, Helena, MT 59601
Department of Natural Resources, Energy Planning Division, Helena, MT 59601
Department of Natural Resources, Water Resources Division, Helena, MT 59601
Department of State Lands, Helena, MT 59601
Montana Bureau of Mines & Geology, c/o Montana Tech, W. Park St., Butte, MT 59701
Environmental Quality Council, Helena, MT 59601
Department of Community Affairs, Aeronautics Division, Helena, MT 59601
Montana Historical Society, State Historic Preservation Program, Helena, MT 59601
Montana State Library, Helena, MT 59601
U.S. Forest Service, Regional Forester, Federal Building, Missoula, MT 59807
U.S. Forest Service, Gallatin National Forest, Box 130, Federal Building, Bozeman, MT 59715
U.S. Environmental Protection Agency, Region VIII, 1860 Lincoln St., Suite 103, Denver, CO 80295
U.S. Environmental Protection Agency, Federal Building, 301 S. Park, Drawer 10096, Helena, MT 59601
U.S. Department of the Interior, Office of the Secretary, Missouri Basin Region, Denver Federal Center, Denver, CO 80225
U.S. Fish & Wildlife Service, Federal Building, Room 3035, 316 N. 26th St., Billings, MT 59101
U.S. Federal Energy Administration, Region VIII, 1075 S. Yukon, Box 26247, Belmar Branch, Lakewood, CO 80226
District Engineer, Omaha District, Corps of Engineers, Attn: Operations Office, 6014 U.S. Post Office and Courthouse, Omaha, NE 68102
U.S. Geological Survey, George Davis, WRD, National Center No. 407, 12201, Sunrise Valley Drive, Reston, VA 22092
Soil Conservation Service, Box 970, Bozeman, MT 59715
National Park Service, Yellowstone Park, WY 82190
Bonneville Power Administration, Jack Kiley, Environmental Manager - SJ, Box 3621, Portland, OR 97208
Honorable John Melcher, United States Senate, Washington, D.C., 20510
Honorable Max Baucus, United States Senate, Washington, D.C., 20510
Honorable Pat Williams, House of Representatives, 1641 Longworth Building, Washington, D.C., 20515
Honorable Ron Marlenee, House of Representatives, 1641 Longworth Building, Washington, D.C., 20515
Rita Sheehy, 1701 Choteau, Helena, MT 59601
Earl F. Colton, D.V.M., P.O. Box 206, Kalispell, MT 59901
Dr. John F. McGregor, Rm 301, Great Falls National Bank, Great Falls, MT 59401
Dr. John Newman, Box 3493, Butte, MT 59701
Charles Shields, 1755 W. Central Ave., Missoula, MT 59801
William Spoja, Jr., Box 882, Lewistown, MT 59457
Grace M. Edwards, 140 So. Crestwood Dr., Billings, Mt 59102

Gallatin County Commission, Box 1905, Bozeman, MT 59715
Emery Nelson, Room 105, Courthouse, Bozeman, MT 59715
Joel Shouse, P.E., Box 337, Bozeman, MT 59715
Sheriff L. John Onstad, Courthouse, Bozeman, MT 59715
Mayor of West Yellowstone, West Yellowstone, MT 59758
Police Chief of West Yellowstone, West Yellowstone, MT 59758
West Yellowstone School Superintendent, West Yellowstone, MT 59758
Bozeman Public Library, Bozeman, MT 59715
Library, Montana State University, Bozeman, MT 59715
Missoula Public Library, Pine & Pattee, Missoula, MT 59801
Library, University of Montana, Missoula, MT 59801
Butte Free Public Library, Butte, MT 59701
Lewis & Clark Library, 120 S. Last Chance Gulch, Helena, MT 59601
Great Falls Public Library, Great Falls, MT 59401
Billings City-County Library, 510 N. Broadway, Billings, MT 59101
Bridger Bowl, Box 846, Bozeman, MT 59715
Big Ski Resort, Box 1, Big Sky, MT 59716
Grand Targhee Resort, William Robinson, via Route #1 Alta, WY, Driggs, ID 83422
Jackson Hole Ski Corporation, Bruce Nurse, Box 290, Teton Village, WY 83025
U.S. Ski Association, Northern Division, Oswald Berg, Jr., 1429 Grand Ave., Bozeman, MT 59715
International Ski Federation, Amos Little, M.D., 1019 Flowerree, Helena, MT 59601
International Ski Area Association, Phil Jones, Park City Ski Area, Box 39, Park City, UT 84060
Burlington Northern, Inc., Dan Peinovich, Director of Engineering, 2224 Montana Ave., Billings, MT 59101
Fall River Rural Electric Cooperative, Inc., Ashton, ID 83420
Montana Power Company, 40 East Broadway, Butte, MT 59701
Center For Balanced Transportation, Box 931, Bozeman, MT 59715
Jim Goetz, Box 1322, Bozeman, MT 59715
Jim DeWolf, 2005 South Rouse, Bozeman, MT 59715
Anna Belle Phillips, High Country News, Box 1155, Bozeman, MT 59715
Bozeman Daily Chronicle, Box 1188, Bozeman, MT 59715
Tribune Capitol Bureau, 515 N. Sanders, Helena, MT 59601
Lee State Bureau, Box 4249, Helena, MT 59601
Environmental Information Center, Box 12, Helena, MT 59601
Doris Milner, Montana Wilderness Association, Route 1, Box 1410, Hamilton, MT 59840
Northern Rockies Action Group, 9 Placer Street, Helena, MT 59601
Montana Wilderness Association, Bill Bishop, Box 635, Helena, MT 59601
Mike Comola, 1220 Leslie Ave., Helena, MT 59601
Trout Unlimited, Neil Travis, 411 SE, Livingston, MT 59047
Joe Cutter, West Yellowstone, MT 59758
Elizabeth Smith, 2311 Highland Court, Bozeman, MT 59715
Resources Education Foundation, Inc., Box 5027, Helena, MT 59601
Western Environmental Trade Association, Northwestern Bank Building - Room 307, Helena, MT 59601
Defenders of Wildlife, Hank Fischer, 947 Rimini Court, Missoula, MT 59801
Montana Wildlife Federation, Box 4373, Missoula, MT 59806
Sierra Club, Jean Warren, 509 Hill, Missoula, MT 59801
Wilderness Society, Bill Cunningham, Box 12, Helena, MT 59601
Montana Wool Growers Association, Box 1693, Helena, MT 59601
Montana Chamber of Commerce, Box 1730, Helena, MT 59601
Montana Realtors Association, 2021 11th Avenue, Helena, MT 59601
C.C. Gordon, Department of Botany, University of Montana, Missoula, MT 59801
Ray Gold, Institute For Social Research, University of Montana, Missoula, MT 59801

Friends of the Earth, Ed Dobson, Box 882, Billings, MT 59103
Montana Stockgrowers Association, Box 1679, First National Bank Building, Helena, MT 59601
Rep. John Vincent, 209 East Lamme, Bozeman, MT 59715
Rep. John Scully, Box 1172, Bozeman, MT 59715
Rep. K.L. Nordtvedt, Jr., 118 Sourdough Ridge, Bozeman, MT 59715
Rep. Robert Ellerd, 2206 Bridger Drive, Bozeman, MT 59715
Sen. Paul Boylan, 3747 S. 19th Rd, Bozeman, MT 59715
Sen. Everett Lensink, 1611 S. Willson, Bozeman, MT 59715
Montana AFL-CIO, Box 1176, Helena, MT 59601
Montana Farmers Union, Box 2447, Great Falls, MT 59403
Gallatin Sportsmen's Association, Richard Day, Rt. 3, Box 200, Bozeman, MT 59715
Montana Cooperative Wildlife Research Unit, John Craighead, University of Montana, Missoula, MT 59801
Steve Mealey, U.S. Forest Service, Shoshone National Forest, Cody, WY 82414
Ken Greer, Wildlife Lab, Research Park Building, Montana State University, Bozeman, MT 59717
Interagency Grizzly Bear Study, Richard Knight, Box 1376, Bozeman, MT 59717
Bonnie Blanchard, Box 1376, Bozeman, MT 59717
Jim Nybo, Box 1050, Helena, MT 59601
Harold Eagle, Morrison-Maierle, Inc., 910 Helena Ave., Helena, MT 59601
John Montagne, Professor of Geology, Department of Earth Sciences, Montana State University, Bozeman, MT 59717
Gage Davis, Gage Davis and Associates, 1215 Spruce St., Boulder, CO 80302
Joe Eagle, West Yellowstone, MT 59758
Cal Dunbar, West Yellowstone, MT 59758
E.L. Spainhower, West Yellowstone, MT 59758
West Yellowstone Chamber of Commerce, West Yellowstone, MT 59758
Dan McDonald, West Yellowstone, MT 59758
First Security Bank of West Yellowstone, President, West Yellowstone, MT 59758
John P. Hall, Sherrie John Manor, Mechanicsburg, PA 17055
Anthony Qamar, Seismologist, Department of Geology, University of Montana, Missoula, MT 59801
Department of Housing and Urban Development, Office of Interstate Land Sales Regulation, 909 17th St., Denver, CO 80202
Kenneth Bryson, Department of Speech Communication, Montana State University, Bozeman, MT 59717
David Han, Box 47, Star Route, Bozeman, MT 59715
Tim Church, Box 932, Missoula, MT 59807
Steven Wenzel, 231 E. Main Apt#3, Bozeman, MT 59715
Mark Gardner, Box 238, West Yellowstone, MT 59758
Douglas Rogness, 711 S. 9th Apt#4, Bozeman,MT 59715
Charlene C. Owens, Box 185, West Yellowstone, MT 59758
Jay Smith, 312 Boundary, West Yellowstone, MT 59758
Nona Smith, Box 415, West Yellowstone, MT 59758
Ron Young, 424 N. Willson, Bozeman, MT 59715
Joe Roberts, W. 110 Florence St., Spokane WA 99218
John Wright, DDS, Medical Arts Building, 300 N. Willson, Bozeman, MT 59715
Mary Larson Yates, Box 292, Arlee, MT 59821
Laura Hood, 2227 E. Vista, Missoula, MT 59801

This environmental impact statement has been prepared for the proposed Ski Yellowstone development in Gallatin County, and is being submitted to you for your consideration.

Sincerely,

Edward Casne wes

Edward W. Casne, P.E.
Chief
Subdivision Bureau

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MONTANA DEPARTMENT OF HEALTH
AND
ENVIRONMENTAL SCIENCES
FINAL
ENVIRONMENTAL IMPACT STATEMENT

SKI YELLOWSTONE

GALLATIN COUNTY

Pursuant to the Montana Environmental Policy Act, Section 75-1-201, MCA, the act controlling both public and private water supply and sewage disposal for subdivisions, Section 76-4-101, MCA, and the act to control water pollution, Section 75-5-101, MCA, the following environmental impact statement (EIS) was prepared by the Montana Department of Health and Environmental Sciences (DHES), Environmental Sciences Division, concerning the request for administrative approval of Ski Yellowstone, a proposed subdivision near West Yellowstone, Montana.

DESCRIPTION

Ski Yellowstone, Inc., proposes an integrated recreational development in the Mount Hebgen area, six miles west of Yellowstone National Park and 12 miles northwest of West Yellowstone, Montana (Reference Map #1). The development would extend from the summit of the mountain to the shore of Grayling Arm (a bay that flows into Hebgen Lake). A ski village would be built at the base of Mount Hebgen in Red Canyon, north of U.S. Highway 287 (U.S. 287) and a lake village south of the highway (Reference Map #2).

The ski area would be on Gallatin National Forest land and encompass most of the east face of Mount Hebgen. The ski and lake villages would be built in four phases (or filings) on land owned by the corporation.

A U.S. Forest Service (USFS) special use permit will be required for development of the ski slopes on 1,880 acres of national forest land. Ski Yellowstone owns 960 acres in the Red Canyon area.

Development of the ski slopes would also be in phases. When completed, there would be 13 chair lifts. From the base of the ski village to the summit, the vertical difference is 2,000 feet.

Skier capacity estimates vary according to sources: 5,270 skiers (Brandenberger, USGS, 1973), 6,500 (Ski Yellowstone, Inc.) and 8,200 (Snow Engineering).

The tentative construction schedule for the ski lifts is as follows:

Phase I - Lifts A_1,A_2,B,D,E

Phase II - Lifts G,H,I

Phase III - Lifts A,C,(F)

Phase IV - Lift J,K

(Reference Map #2)

Map # 1

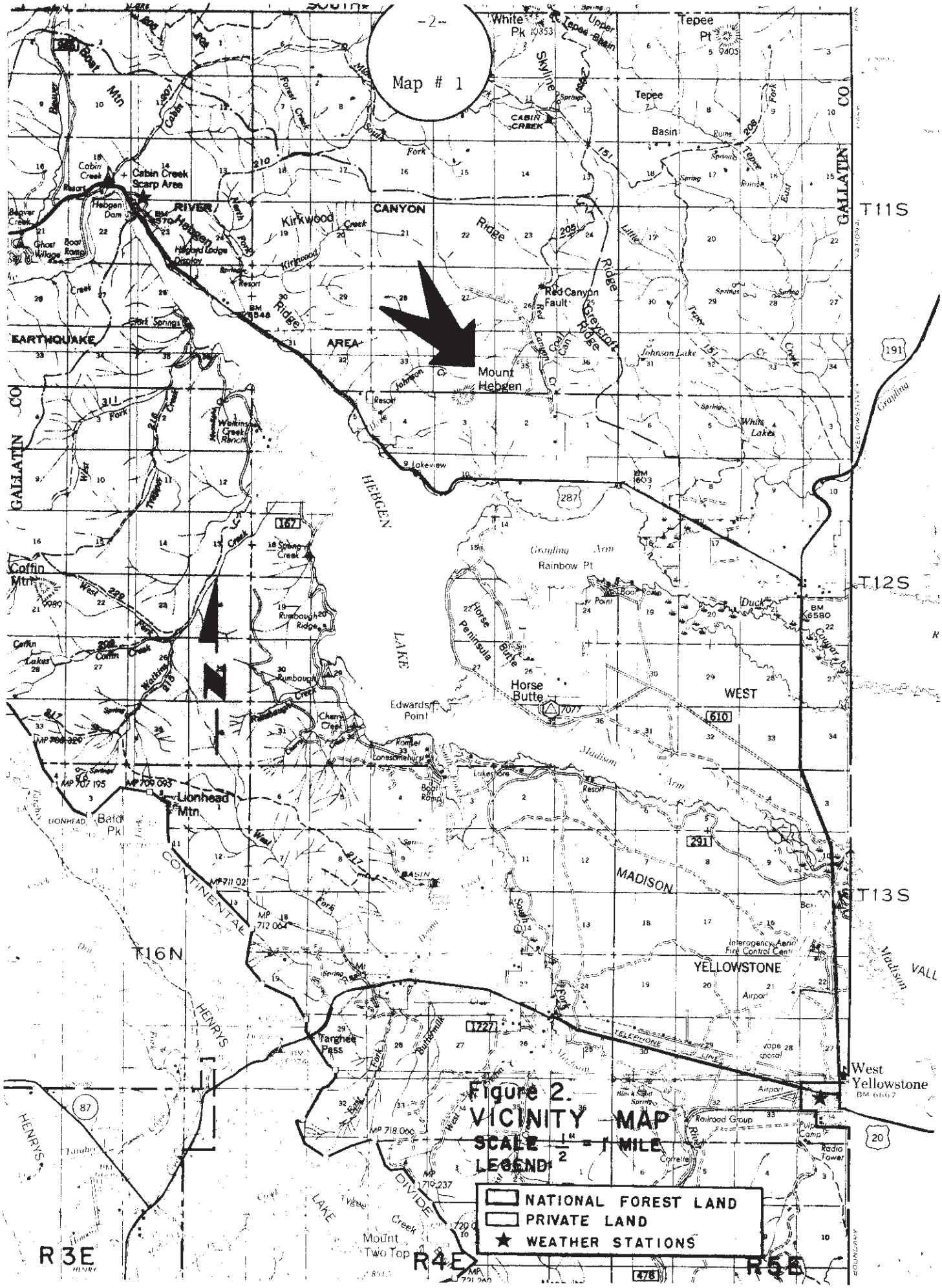
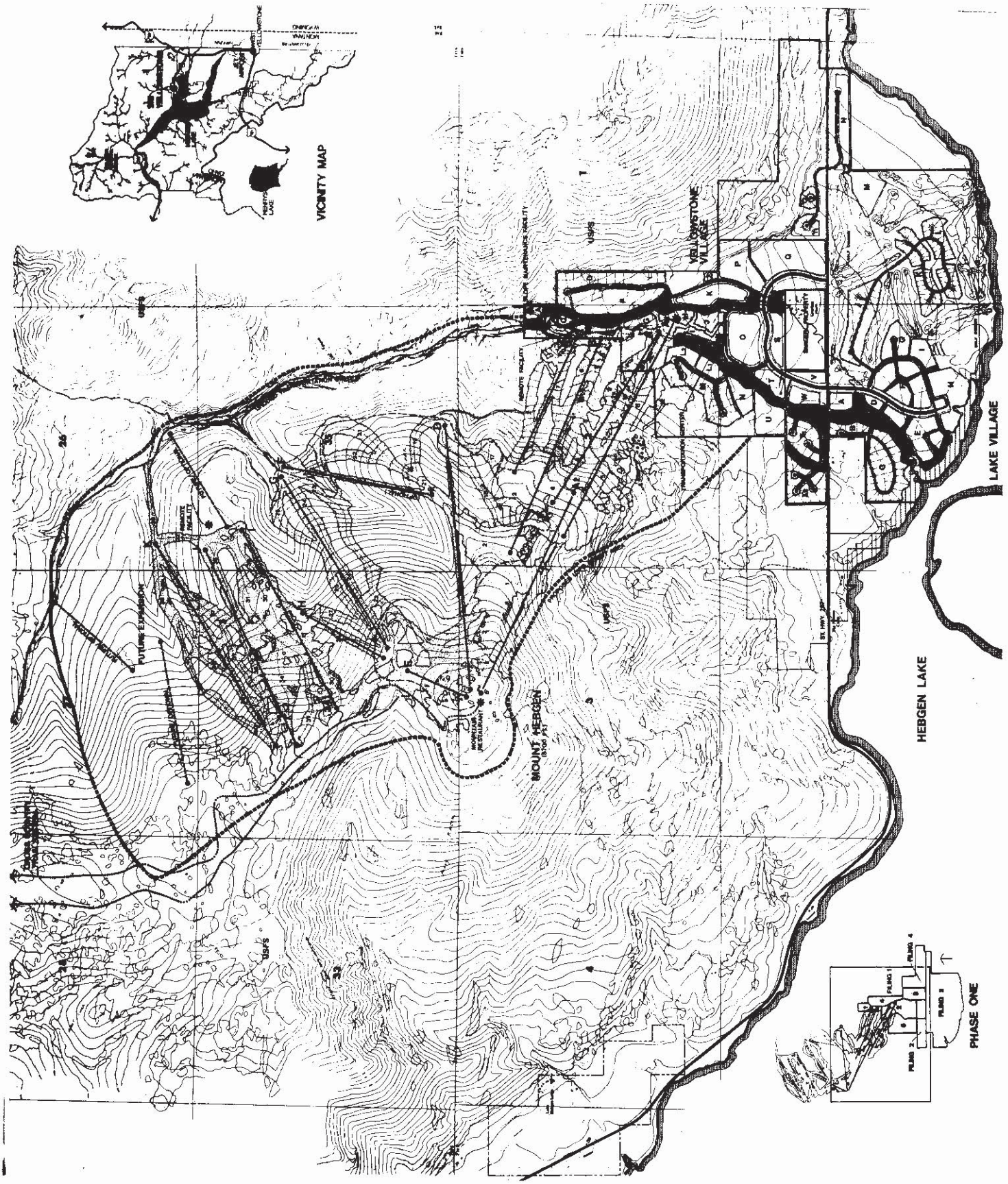


Figure 2.
VICINITY MAP
SCALE 1/2" = 1 MILE
LEGEND:

- NATIONAL FOREST LAND
- PRIVATE LAND
- ★ WEATHER STATIONS

Map #2


VICINITY MAP
YELLOWSTONE VILLAGE
LAKE VILLAGE
HEBGEN LAKE
MOUNT HEBGEN
PHASE ONE

The ski village would include a 400-room lodge, 225 condominium units and 89 single family dwellings, for a total capacity of 2,250 visitor beds. There would be commercial facilities, a fire station and a maintenance site. Development of the ski village would cover a total of 59 acres.

The lake village would include 200 lodge rooms, 268 condominium units and 135 single family dwellings and 225 units of employee housing, for a total capacity of 2,220 beds and 450 employee beds. The lake village would also have commercial facilities and cover 55 acres.

In addition to the villages, the corporation plans to construct a restaurant and a "remote facility" on Mount Hebgen. The restaurant would be near the terminal of the gondola at the top of the mountain and be the headquarters for ski-related activities on the mountain. The remote facility would be at the base of lifts I and J, and include eating facilities, ski patrol quarters and rest rooms.

This EIS will assess the potential impacts of the entire development; however, in terms of approval, the DHES will only be considering Filing No. 1, which includes the ski village. Filings 2-4--which include the lake village plans--have been submitted to Gallatin County and the DHES for review.

The projected permanent population for Ski Yellowstone is 390 persons. It is estimated that 70 to 80 school-aged children would attend school in West Yellowstone. At full development, developers anticipate an annual occupancy rate of 649,215 persons.

The development will rely on West Yellowstone for primary and secondary education, retail shopping and medical and professional services. According to the corporation, the commercial facilities at Ski Yellowstone will be aimed at providing short-term visitor needs and speciality items.

ALTERNATIVES AND RECOMMENDATION

Alternatives

1. Disapprove Ski Yellowstone:

   The area might remain as it is, or the development corporation might divide the land into 20-acre parcels, thus avoiding the state's review process.

2. Unconditional Approval:

   Ski Yellowstone would be approved without any additional requirements.

3. Conditional Approval:

   The DHES must receive and approve the following items before a certificate of plat approval will be issued:

   a. Final plans and specifications for the water supply and sewerage

system including a time schedule for each phase of construction;

b. Operation and maintenance plans for the water supply and sewerage systems that include descriptions of how ground water monitoring information will be utilized in the operation of the sewage treatment plant;

c. Groundwater monitoring plans showing well locations, depths, sampling procedure and parameters to be monitored;

d. Sediment control plans to include design details or control structures, streambank preservation and construction constraints, especially in areas effecting stream channel, and

e. Legal documents establishing ownership and responsibility for construction, monitoring and maintenance of the water supply and sewerage systems.

The DHES also recommends that the developer seriously consider treating the water to reduce hardness, sulfates and dissolved solids.

Recommendation

Based on the information in this EIS, the DHES recommends alternative three, conditional approval of Ski Yellowstone.

REFERENCED MATERIAL

The DHES references all the material in the draft EIS.

LETTERS AND RESPONSES

The following includes the public responses to the draft and the DHES' answers to substantive questions and comments. The public comments were sent to the developer, and the developer's representative informed the department that the corporation had "...no comment regarding the responses and communications received in support of and in opposition to the issuance of a certificate for removal of the sanitary restrictions from Filing No. 1 of Ski Yellowstone...."

The Letters and Responses include:

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
P. O. Box 970, Bozeman, Montana 59715

May 1, 1979

RECEIVED
MAY 2 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

Edward Casne, Chief
Subdivision Bureau
Environmental Sciences Division
Department of Health
and Environmental Sciences
Cogswell Buidling
Helena, MT 59601

Dear Mr. Casne:

The Soil Conservation Service comments on the Ski Yellowstone Environmental Impact Statement follow.

- On page 18, paragraph 1 indicated that fan soils are 90"+ deep. Paragraph 3 indicates that slope instability is present near the proposed sewage treatment lagoon. Fan materials below the soil were not reported.

  Many lagoons in Montana have been built in permeable materials resulting in excessive seepage. If the lagoon excavation goes below the clay loam soils, seepage could very well aggravate the slope stability problems as well as provide inadequate treatment.

- Ski Yellowstone will sell blocks of land to individual developers. At Big Sky, control of erosion and water management was difficult, if not impossible, as the individual developers sublet construction to the point that the original developers (Big Sky) had little control over what happened.

We appreciate the opportunity to review and comment on this proposed project.

Sincerely,

Van K Haderlie
FOR: State Conservationist

1) The plans for the lagoon include providing a 12" liner of clay in the lagoon. The final design before it will be accepted must assure that allowable seepage rates from the lagoon will meet prescribed limits.

2) The loss of control of erosion and sedimentation management could be a problem. An adequate plan must be adopted prior to the DHES' approval, but enforcement is difficult, if not impossible, without cooperation from the developer and any other persons recognizing violations of the plan.

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
FEDERAL BUILDING MISSOULA, MONTANA 59801

RECEIVED
MAY 15 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

1950

MAY 14 1979

Subdivision Bureau
Environmental Sciences Division
Department of Health and Environmental Science
Helena, MT 59601

Dear Sir:

We have reviewed the Draft EIS you prepared on Ski Yellowstone. It is a well written, easy to understand report that we commend you for.

The description you show on pages 2 and 5 of the proposed project could be updated as Ski Yellowstone, Inc., has modified some plans. For example, they no longer plan a gondola. You should contact them for their latest information.

Your recommendation for a conditional approval appears sound.

Sincerely,

ROBERT H. TORHEIM
Regional Forester

3) Comment noted.

DEPARTMENT OF THE ARMY
OMAHA DISTRICT, CORPS OF ENGINEERS
6014 U.S. POST OFFICE AND COURTHOUSE
OMAHA, NEBRASKA 68102

RECEIVED
MAY 4 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

MROPD-A

2 May 1979

Mr. Edward Casne, Chief
Subdivision Bureau
Environmental Sciences Division
Department of Health and Environmental Sciences
Helena, MT 59601

Dear Mr. Casne:

This letter is in response to your Draft Environmental Impact Statement for Ski Yellowstone's proposed ski resort development in Gallatin County, Montana. We have reviewed the Draft Environmental Impact Statement (DEIS) pursuant to the requirements of Section 404 of the Federal Water Pollution Control Act, as amended. Although information is lacking on the types of construction activities which would be undertaken along Red Canyon Creek and Hebgen Lake, it appears that the proposed development would involve some construction activities in these two water bodies. In addition, the bank erosion problem along lower Red Canyon Creek may require bank stabilization measures in connection with development activities. If the proposed development involves discharge of dredge or fill materials, including riprap, into Hebgen Lake, Red Canyon Creek, or any wetlands which may be present, a Section 404 permit may be required. Further information on Section 404 requirements can be obtained by contacting Mr. Robert Sage (Phone 402-221-4172).

Please keep us informed as more detailed plans are developed.

Sincerely,

JOHN E. VELEHRADSKY
Chief, Planning Division

4) Comment noted.

United States Department of the Interior
OFFICE OF THE SECRETARY
DENVER, COLORADO 80225

RECEIVED
APR 26 1979
MDHES
Environmental Sciences Div.

April 24, 1979

Mr. Tom Ellerhoff
Environmental Sciences Division
Department of Health and Environmental Science
State of Montana
Helena, Montana 59601

Dear Mr. Ellerhoff:

This will confirm our telephone conversation of April 23, 1979, concerning review of the State of Montana's environmental impact statement for the proposed Ski Yellowstone development in Gallatin County.

As discussed, the Department of the Interior provided consolidated comments for the Forest Service's environmental statement for the Special Use Permit for Ski Yellowstone and to be consistent, we should do the same on yours.

As agreed, we will try to have our consolidated comments to you not later than May 18, 1979.

Thank you for your consideration.

Sincerely,

John E. Raybourn
Regional Environmental Officer

cc: NPS, Yellowstone-Attn: Ben Clary
USGS, Reston-Attn: Herb Stewart
F&WS, Billings-Attn: Dennis Christopherson
OEPR, Washington-Attn: John Farrell

5) Comments received June 21, 1979, 34 days after the 45-day deadline for comments, consequently the comments are not included in this document.

MEMORANDUM May 9, 1979

TO: Wayne Wetzel

FROM: Ed Miller, Chief, Technical Services

SUBJECT: Ski Yellowstone EIS (DHES)

Received this EIS on May 4, 1979. It may be too late to comment. In case you try to comment, please consider the following:

Page 13, Paragraph 3 & 4: 230 mg/l Sulfate will probably be laxative on non-resident population utilizing the Ski Yellowstone Resort area water. This in addition to 631 mg/l dissolved solids makes this drinking water very marginal.

Page 13, Paragraph 5,6, & 7: The staging of the central sewage system needs more clarification. The degree to which lagoon systems development stays ahead of village growth isn't specified nor assured. The spray-irrigation systems concept/practice is relatively new, and the bacteriological/viral consequences are not fully analyzed technically. The operation of this facility should be required to comply with EPA standards for water quality, and to monitor according to EPA Tech Bulletin 430/9 - 75 - 001.

Page 13, Paragraph 9: The design criteria of a five year - 24 hour storm seems too limited. I'm sure that the rainfall records on that site are scanty enough to render the statistical validity of the data set relatively useless.

Page 14, Paragraph 1 & 2: State DHES variances in turbidity should be spelled out for construction activities -- in terms of JTU limits and time frames. The construction company should not receive Carte Blanche variances.

Pages 14 - 17: The earthquake discussions on these pages are pertinent. Of importance (not discussed in EIS) is the effect of a major disturbance on the integrity of the sewage disposal system for the project. This should be addressed, since the bypassing of sewage effluent into the Grayling Arm of Helgen Lake would aggravate the problem of another toxic algal bloom caused by the Blue Green algal complex (Analena flos-aquae, et. al.)

This aspect (seismic activity) is addressed on page 18, paragraph 3. The effects are not discussed.

Page 20, Paragraph 6: The mitigation of construction damage as recommended in this paragraph sounds reasonable, but probably is not practicable from a contactors point of view. It is not likely that these mitigation efforts will be enacted and enforced.

Page 20, Aesthetics: Is there any plan to require the project owner/operators to comply with a planned program to approach the objectives set out in these three paragraphs? Does a plan exist?

Page 22, Paragraphs 3 - 6: It is probable that many of the owners of single dwellings/condominiums will use stove/fireplaces. In reality most of

6) The sulfate level may have a laxative effect on persons not accustomed to the water, but the sulfate level does not exceed the state's drinking water standards. The developer's engineer has been asked to consider treatment of the water in the final design, but treatment can only be required when the sulfate level exceeds the standards.

7) Final plans for the sewage system will include stage design and construction schedules for the lagoon, and a spray irrigation system that is compatible with the housing development. Design and monitoring of the spray irrigation system will follow Environmental Protection Agency (EPA) guidelines.

8) There was a typographical error. The estimations were based on a 25-year, 24-hour storm.

9) The Water Quality Bureau, DHES, requires a separate authorization for each stream disturbance. These are reviewed on a site specific basis and limits on the turbidity are established for each site.

10) Earthquakes could cause damage to the sewer system and the lagoon. The chance of destroying the lagoon, thus causing a direct discharge to Grayling Arm, is remote. An earthquake of this magnitude would also destroy the sewer collection and water supply system. Overland flow of the sewage would reduce its harmful effects to Grayling Arm, and emergency repairs to the lagoon dike could be made.

11) This is true; the only place this could be enforced would be on Forest Service land. Construction activities on private land could only be controlled when they threaten water quality standards or public health.

12) The analysis was made by the Forest Service. It's possible it can require aesthetic considerations as part of the special use permit, but in terms of conditions on private land, it will be up to the developer.

13) Close cooperation between the developer and the Air Quality Bureau could alleviate potential air quality problems. The developer may be receptive to this, but no firm commitment has been made.

the purchasers would want these options. The potential for air pollution is real.

Page 26, Paragraph 3: Last number in paragraph is 1970. I assume this is an error.

Page 50, 3f: Add a performance bond requirement for implementation of items 3a - d; bond to be forfeit in event of change of ownership; non-compliance with 3a - d.

EM/rm
Enclosure

14) The date 1970 was used for comparison purposes

15) The suggestion of requiring a performance bond has merit; however there is no statutory authority for it.

MONTANA HISTORICAL SOCIETY
HISTORIC PRESERVATION OFFICE
225 NORTH ROBERTS STREET • (406) 449-4584 • HELENA, MONTANA 59601

May 2, 1979

Tom Ellerhoff
Environmental Sciences Division
Dept. of Health & Environmental Sciences
Helena, MT 59601

RE: Ski Yellowstone EIS, Gallatin Co.

Dear Tom:

Thank you for the opportunity to comment on the Ski Yellowstone EIS. I have the following comments which I think should be incorporated into the EIS.

According to the archaeologist's report in the Ski Yellowstone Environmental Study, a cultural resources survey of the study area revealed 13 prehistoric sites and 4 historic sites located on Forest Service and private lands. It appears that 8 of the 13 prehistoric sites, and one historic site which is the old Grayling townsite, are eligible for the National Register of Historic Places.

Avoidance of all the identified archaeological and historical sites is recommended. If avoidance is not possible, a plan for mitigation of the effects of the project on cultural resources should be formulated. The plan should include further work which is recommended at sites 24GA699, 1133, 326, 696, 697, 700, 1131, 1132, 695, 1137, 1138 and 1140. Further work would include architectural recordation, surface collecting, excavation, and monitoring to assure proper data recovery.

16) Comment noted.

The Forest Service has responsibilities for the protection of cultural and historic properties under the National Historic Preservation Act, Executive Order 11593, and the National Environmental Policy Act. E.O. 11593 specifically refers to the federal responsibility of assuring that their plans and programs contribute to the protection of non-federally owned historic and cultural properties.

17) Comment noted.

Sincerely,

Ken Korte
State Historic Preservation Officer

KK:PB:pb

RECEIVED
MAY 2 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

711 South Ninth, apt. 4
Bozeman, MT 59715

May 2, 1979

Subdivision Bureau
Environmental Sciences Division
Department of Health and Environmental Sciences
Helena, MT 59601

Dear Sirs:

This letter contains my comments concerning your Draft Environmental Impact Statement for the proposed Ski Yellowstone recreational development in Gallatin County. After reviewing the statement, I have found several aspects which I feel should have been given greater consideration due to severe potential problems.

Focusing on the consideration of proposed water supply, sewage disposal and solid waste disposal systems, I feel that these were adequately covered with a few exceptions. I foresee problems of turbidity and sedimentation in Grayling Arm due to activities on the aluviul fan. Even with sediment control procedures, there is still a high potential of detrimental effects to the life of the lake. Another problem that could develop into serious proportions is the affect on water quality due to possible earthquake activity. The disturbance of the ground structure due to seismic shaking could cause a rapid rate of sewage infiltration into groundwater and surface waters. Such an incident may result in tremendous pollution of the water resources in the area.

I oppose the fact that the DHES may base final approval or disapproval of a subdivision on the criteria and statutary authority contained in the Sanitation in Subdivisions Act. Even with the Beaver Creek South opinion concerning decision-making authority, it seems ridiculous to contain the requirements ofMEPA in the DEIS and then to have the DHES base its decision only on those few considerations. In this respect, the impact statement is greatly truncated of adequate information and consideration of those aspects not under the DHES decision-making authority. There are still considerable questions to be answered concerning wildlife habitat destruction, earthquake hazards, and the potential to succeed as an all-season resort. Reflections from Big Sky indicate that skiing is not on the up-swing, but is actually declining. Inconclusive evidence of future energy supplies parallels the general condition of the entire country.

With such major questions still at hand concerning the Ski Yellowstone resort, I feel that the conditional approval given by the DHES should not be given at this time.

Sincerely yours,

Douglas Rogness

Douglas Rogness

18) Turbidity and sedimentation in Red Canyon Creek and Grayling Arm can be mitigated by using proper construction techniques and properly treating runoff water. Final plans for the project must include methods for controlling erosion and sediment.

19) Reference the discussion of anticipated earthquake problems (10) on Page 11.

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MAY 18 1979
MDHES
Environmental Sciences Div.

The Wilderness Society
107 West Lawrence, Helena, Montana 59601 (406) 443-7350
Mail To: P.O. Box 1184

May 18, 1979

Ed Casne, Chief
Subdivision Bureau
Environmental Sciences Division
Department of Health & Environmental Sciences
Helena, Montana 59601

Dear Mr. Casne:

On behalf of The Wilderness Society I wish to comment on the Department of Health & Environmental Sciences (DHES) draft environmental impact statement on Ski Yellowstone. The Wilderness Society, along with other conservation organizations, has long been concerned over both the on-site and off-site impacts of the massive Ski Yellowstone development, as well as over fundamental quality of life issues raised by the proposal.

Compared to other statements, this EIS appears to be a solid effort by DHES. Indeed, it's fairly complete review of environmental, social and economic problems that would be stimulated by Ski Yellowstone make a compelling case for disapproval. Thus, it is all the more discouraging that the Department is proposing to take the easy and traditional way out with a narrow interpretation of the Beaver Creek South opinion. Recognizing that the Department is still bound by at least the procedural requirements of the Montana Environmental Policy Act (MEPA) and that Beaver Creek South did not address substantive questions dealing with scope of review; the latitude certainly exists for a more liberal interpretation of MEPA. Such interpretation should include recognition by the Department of it's supplemental authority, inherent in MEPA, to deny objectionable subdivisions on the basis of broad environmental concerns, such as those expressed in this EIS. I therefore urge DHES to re-examine the basic assumption underlying it's proposed conditional approval of Ski Yellowstone. If this re-examination is conducted in good faith, I am confident that the Department will agree with our position that Ski Yellowstone should not be permitted for a variety of sound public policy reasons, ranging from the clear statutory grounds of sewage, water and solid waste to the broad environmental problems documented in the EIS.

Numerous environmental problems will be caused by Ski Yellowstone, anyone of which should be sufficient as grounds for denial. For example, the direct impacts on grizzly bear and known grizzly bear habitat cannot simply be described and then ignored as is done in the EIS. Although not explicitly bound by the federal Endangered Species Act DHES must at least share a moral responsibility in it's implementation since the Department controls the major states permits making Ski Yellowstone possible.

Nor can DHES bury it's head in the sand in terms of earthquake hazard. It's statutory duty clearly includes responsibility for the general health, safety and welfare of the public. Significantly, Ski Yellowstone's chief environmental consultant, Dr. John Montagne, revised his geologic report aknowledging the "prime hazard" of seismic shaking in the Red Canyon area.

Nor do I feel that DHES should get into the practice of approving speculative large-scale developments which do not have the proven financial resources necessary for proper planning and completion of the development. Such is the case with the

financially-shaky Ski Yellowstone venture. Even if Ski Yellowstone is able to raise the funds needed for it's development it may never become a financial success, as pointed out by DHES consultant James Nybo. Nybo believes that under certain conditions Ski Yellowstone could succeed over the long run, but even this optimistic conclusion is subject to serious question.

The availability of future energy supplies for Ski Yellowstone is yet another major issue affecting the feasibility of the development. DHES refers to future supplies as being "inconclusive". I would go a step further and state that future supplies are highly unlikely and that, therefore, we should not as a matter of public policy encourage energy-intensive developments which are known to face an uncertain energy future. This is unfair to the public at large as well as to the developers in the long-run.

On page 48 mitigation measures by the developers are listed as an environmental "benefit". Mitigation of an environmental impact is not a benefit. Rather, it is a means of reducing costs. I would further add to the list of costs (p. 49) degradation of de facto wilderness resources in the contiguous Taylor-Hilgard Congressionally-mandated wilderness study area.

A minor point on page 28--there are 9 rather than 10 areas included within the Montana Wilderness Study Act (S.393). Also, the Taylor-Hilgard Wilderness Study Area should not be viewed only as a "recreational resource" since wilderness provides numerous public benefits including watershed protection, scientific research, preservation of wildlife habitat and ecosystem health and stability.

Looking for a moment at just the direct statutory factors, the EIS fails to demonstrate that an annual influx of 720,000 persons attracted by Ski Yellowstone will not create serious water quality problems in the Grayling Arm of Hebgen Lake which is highly susceptible to toxic algal growth. Nor does the EIS deal with procedures for the disposal of solid waste as required by the Sanitation in Subdivisions Act. In fact, proper solid waste disposal isn't even listed as a condition to approval on page 50!

In view of the above, I repeat our recommendation that DHES adopt alternative #1--disapproval of the Ski Yellowstone proposal. I have appreciated this opportunity to comment on this EIS.

Sincerely,

Bill Cunningham

Bill Cunningham
Regional Representative

20) Comment noted.

21) Comment noted.

April 13th, 1979

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APR 16 1979

MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

Mr. Ed. Casne, Chief
Subdivision Bureau
Envir. Sciences Div.
DHES
Helena, Mt. 59601

Dear Mr. Casne,

I have reviewed the EIS on Ski Yellowstone which was prepared by DHES and have a few questions to ask.

On p. 13 reference is made to proposed spraying of sewage effluent as a method of disposing of the sewage. On p. 44 this is referred to again as an enhancement of agricultural value as it would benefit the hay fields in the area, but then in the same papagraph the statement is made that "future plans call for turning the hay field into a golf course." What happens then to the effluent? Can it be used in the same manner and quantity as upon hay fields? If not, what are the alternate plans for its disposal?

Second-solid waste disposal. I presume that calculations have been made of the probable daily amount to disposed of. Can the west Yellowstone sanitary landfill take care of this on 10 acres of land for the life of Ski Yellowstone? What , except carting the stuff to Bozeman, is the alternative? I seem to remember the flap when Bridger Pines subdivision had in mind a" Honey Bucket Brigade" to truck its waste to an adjacent county. Is Bozeman able and or willing to accept this added burden to its solid waste system?

I feel that real questions still remain concerning Ski Yellowstone's proposed solid waste disposal plans and sewage disposal plans.

A third item, which is probably not in the purview of the DHES, concerns the suitability of Ski Yellowstone weather, mainly temperature, for skiing. West Yellowstone has an areawide reputation as being Montana's perrenial cold spot. Has this been monitored?

I trust that no certificate of plat approval will be issued until the questions of solid waste and sewage disposal for the long term are satisfactorily addressed.

Sincerely,
Doris Milner
Doris Milner
Rt 1, Box 1410
Hamilton, Mt 59840

22) The draft EIS addressed the plans submitted for Filing No. 1. At that time the corporation proposed spray irrigating the treated sewage effluent on a hayfield. Since then the corporation has proposed--Filings No. 2,3 and 4--to make the hayfield into a golf course and spray the course with the treated sewage. Filings 2,3 and 4 will be reviewed in an addendum to this EIS. The question of whether the corporation will be allowed to spray treated effluent on the proposed golf course, in close proximity to residential buildings, will be addressed in the addendum.

23) As the draft EIS points out (Pp. 46-47), the West Yellowstone landfill has leachate problems. With the joint studies nearing completion, it appears the landfill might have to be closed, and the material hauled to a site in Madison County. The cost of disposing of the waste will be assumed by the Ski Yellowstone Corporation and the persons owning the property in the proposed development.

24) Reference the sewage system discussion (7) on Page 11.

25) Weather was mentioned in the Air Quality section (p. 21). It appears there are no records for temperatures or precipitation in the proposed area of the proposed ski slopes.

26) Correct.

May 14, 1979
205 N. 8th
Bozeman, Mt 59715

Subdivision Bureau
Environmental Science Division
Dept. of Health & Environmental Sciences
Helena, Mt. 59601

RECEIVED
MAY 18 1979
MDHES
Environmental Sciences Div.

Sirs:

This letter is in response to your recent draft E.I.S. on the proposed Ski Yellowstone. The document seems to be a good piece of work. However there are some points on which I wish to comment.

I am opposed to the proposed development. In this day and age, it seems ridiculous to continue to build energy-intensive resorts. Energy sources as we know them are finite, and this project is all electric - not efficient for heating, anyway - and they cannot say there will be power in ten years to run the development. And if Big Sky can't make a go of it, how can we expect both of them to make it with inflation ever-increasing and the cost and supply of gasoline becoming prohibitive. Even the federal government says we should start conserving as the answer to some of the problems, then turns around and the US Forest Service approves this proposal.

I am extremely disappointed in the fact that the DHES is restricted in its decision making capacity to water quality, sewage treatment, and waste disposal. The final decision from Beaver Creek South from

2

the Supreme Court leaves gaps in the environmental impact statement process as conducted by the DHES. Especially when such issues as grizzly habitat and earthquake and fault problems were brought up in the statement with new and better information that in the Forest Service's F.E.I.S.

There are some errors, I'm sure, of which I'm not aware. One I know of is the statement that Bridger Bowl has gone on record supporting Ski Yellowstone. This is not so. I have spoken with general manager Bob MacDonald on the subject and brought it to the attention of the Bridger Bowl Board of Directors at a general meeting of the association (Bridger Bowl is a non-profit corporation made up of locals). Mr. MacDonald doesn't seem to think it matters what is said in the EIS. The acting president of the board stated that the corporation will not go on the record either for or against the proposed development. Mr. MacDonald knew this statement came from the Forest Service's FEIS and therefore knew it was erroneously stated there. As many facts as are attributed to the Forest Service's FEIS in this DHES draft — and one I checked on is wrong — then how many others may be wrong.

It seems to me the DHES should be able to judge fully on the proposed Ski Yellowstone from the facts, and whatever other work they may wish to do, should they be able to do so. Thank You.

Sincerely,

Richard R. Mein

27) Comment noted.

April 23, 1979

Subdivision Bureau
Enviromental Sciences Division
Dept. of Health & Enviromental Sciences
Helena, MT 59601

Dear Sirs:

Below are my comments on your EIS of the Ski Yellowstone development.

The developers vague assurances that something will be done to prevent adverse bear-human confrontations is totally inadequate. Plans should be made before, not after.

I realize that your EIS is intended to deal with water quality questions, but I will make comments outside this area.

I strongly feel that the development is questionably at best; the promoters state that out of state skiiers will be their main revenue, but with the Winter closing of the Yellowstone airfield potential skiers will have to bus or drive in, a discouraging situation. Once a skiier arrives there is no guarantee that won't have to huddle in a dark cabin because electricity can not be promised. Add to this the enoromous risk of earthquakes (almost ignored by everyone), and the smelly blue-green algae blooms in the summer and you have what almost seems like a joke.

It is further pointed out that the project will not add greatly to Montanas revenues, but rather draw money away from other Montana ski areas, most of which already have a hard time. Subsequent developments spurred by Ski Yellowstone are not addressed.

28) Comment noted.

All in all I am astounded that a group of susposedly intelligent business men would want to build such a potential disaster. It would be even a greater blunder if we let them. I urge that Ski Yellowstone be given a descent burial.

Sincerely,

Tim Church
P.O. Box 7932
Missoula, MT 59807

One final comment--as an archaeologist I found the statment that "The developers and the Forest Service further conclude that developments like Ski Yellowstone can have a positive impact on cultural resources by unearthing new knowledge about the resource." to be totally laughable. Our cultural resources are fast being destroyed by such developments.

MADISON - GALLATIN ALLIANCE
P.O. BOX 875
BOZEMAN,MONTANA 59715

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APR 24 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

April 23, 1979

Edward Casne, Chief
Subdivision Bureau
Environmental Sciences Division
Dept. Of Health and Environmental Sciences
Helena, MT 59601

Dear Mr. Casne:

I would like to formally request an extension of fifteen (15) days on the comment period on the Ski Yellowstone EIS that was published on April 3, 1979.

This additional time will give the Madison - Gallatin Alliance adequate time to circulate the Environmental Impact Statement among our members and to comment on the complex issue of the Ski Yellowstone development.

Thank you for this consideration.

Sincerely,

Joan W. Montagne

Joan W. Montagne
President, Madison - Gallatin Alliance

CENTER FOR BALANCED TRANSPORTATION

P.O. BOX 1308
BOZEMAN, MONTANA 59715
(406) 587-0906

April 24, 1979

RECEIVED
APR 27 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

Edward Casne, Chief
Subdivision Bureau
Environmental Sciences Division
Department of Health and Environmental Sciences
Capitol Station
Helena, MT 59601

Dear Mr. Casne:

I have received the Department's draft environmental impact statement on Ski Yellowstone. As I am sure you saw in the newspapers, a number of headlines treated the document as if it constituted approval of the resort. I think it would be helpful -- since we have had numerous calls on this point -- for the Department to issue a clarification.

In addition, given the complicated, controversial nature of the proposal, I would request that the Department extend the comment period for fifteen (15) days. I believe that would insure that the public would have an ample opportunity to consider the project in the context of the numerous documents which have circulated on it.

Please let me know whether you can proceed in accordance with these recommendations.

Sincerely,

Rick Applegate

Rick Applegate
Director

RA:pah

RECEIVED
APR 26 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

Dr. Harold L. Baier
[redacted]
3131 Bozeman Rd.
Bozeman, Mt. 59715

April 24, 1979.

Dear Sir,

I have only recently seen a borrowed copy of your Ski Yellowstone EIS and note there is only 30 days allowed for comments. It is requested that this deadline be extended 15 more days.

I would also appreciate it if you would send me a copy.

Sincerely

Harold L. Baier, Ph.D.

Mike and Linda Comola
1220 Leslie Avenue
Helena, MT 59601

RECEIVED
APR 16 1979
MONTANA DEPT. OF HEALTH
& ENV. SCIENCES
SUBDIVISION BUREAU

Attn: Mr. Ed Casne, Chief,
Subdivision Bureau,
Environmental Sciences Division
Department of Health & Env. Sciences
Helena, MT 59601

April 16, 1979

Dear Mr. Casne:

We have reviewed the Department's April 3 environmental impact statement for the Ski Yellowstone request for state administrative approval, and must admit we are more than a little uneasy with the process. It is upsetting to witness a state agency, charged with protecting the quality of Montana's environment and the health of that state's citizens evade that responsibility. It has been suggested, and we concur, Montana could save substantial revenue by doing completely away with the Dept. of Health and Enviromental Sciences, and in its place, simply retain a receptionist to hand out conditional approval permits to all applicants. Somewhat facetious - but accurate.

You acknowledge the Montana Wilderness Association et al vs The Board of Health and Environmental Sciences (33 St Rep 1320) opinion did not address the substantive questions concerned, however, still side with approval of permits while at the same time acknowledging environmental and/or social impacts are expected to occur. It is of little logic, and of less value, to commit public resources in preparation of an environmental impact statement which indicates a given project will have adverse impacts, yet still aprove the application.

In addition, the document fails to contain adequate information to determine the actual impact the proposed fscility would have upon surface and subsurface waters, yet the Department recommends "conditional approval" until this data is provided. This does not even seem consistent with the Sanitation,Subdivisions Act, Title 69, Chapter 50, R.C.M. 1947.

It seems we are, in essence, silently stating that in some foggy conception of "private right to exploit" we will overlook factors such as the project would be situated upon a highly hazardous site, jeopardize a threatened species and other wildlife, require levels of gross energy consumption which might not even be possible to provide due to power limitations, economically may be deleterious to not only investors, but local communities and nearby similar resorts, or, in other words, "public rights".

We strongly urge you amend your final recommendations and opt for disapproval of this unsound facility.

Sincerely,

Mike & Linda Comola

FINAL RECOMMENDATION

The DHES' final recommendation is the same as the recommendation for the draft EIS, conditional approval of the proposed Ski Yellowstone project.