Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

November 9, 2009

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED GOVERNMENTAL AGENCIES AND PUBLIC GROUPS

As required by state and federal rules for determining whether an Environmental Impact Statement is necessary, an environmental review has been performed on the proposed action below:

Project:	East Helena Stormwater Separation Project
Location:	East Helena, Montana
Project Number	C302219
Total Cost	$530,000

The City of East Helena has proposed to disconnect and abandon the existing storm drain collectors along the Main Street corridor between Third Street and Washington Avenue. This project will result in a separate stormwater collection system along the south side of Main Street and two separate discharges to Prickly Pear Creek after sediment removal.

The State Revolving Fund loan program may provide partial funding for the proposed project. Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species and historical sites are not expected to be adversely impacted as a result of the proposed project. Public participation during the planning process generally demonstrated support for the selected alternative. No significant long-term environmental impacts were identified. An environmental assessment (EA), which describes the project and analyzes impacts in more detail, is available for public review at the following locations:

Department of Environmental Quality
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

City of East Helena
Office of City Clerk
306 East Main Street
East Helena, MT 59635

Comments supporting or disagreeing with this decision may be submitted for consideration by the Department of Environmental Quality. After evaluating the comments received, the agency will make a final decision. However, no administrative action will be taken on the project for at least 30 calendar days after release of the Finding of No Significant Impact.

Sincerely,

Todd Teegarden, Bureau Chief
Technical and Financial Assistance Bureau
Planning, Prevention & Assistance Division

CITY OF EAST HELENA
STORMWATER SEPARATION PROJECT

ENVIRONMENTAL ASSESSMENT

I. PROJECT SUMMARY INFORMATION

A. PROJECT IDENTIFICATION

Name of Project:	East Helena Stormwater Separation Project
Applicant:	City of East Helena
Address:	306 E. Main Street
	East Helena, Montana 59635
DEQ Project Number:	C302219

B. CONTACT PERSON

Name:	Terrie Casey, Mayor
Address:	306 E. Main Street
	East Helena, Montana 59635
Telephone:	(406) 227-5321

C. ABSTRACT

The City of East Helena, through a Preliminary Engineering Report (PER) dated April, 2005, has proposed to eliminate existing stormwater collectors which currently divert stormwater flow to the sanitary sewer system. The existing connection of stormwater collectors to the sanitary sewer system (or combined sewer system) poses several problems for the City. As stormwater enters the collection system, particularly during heavy rainfall or snow melt events, the flow to the wastewater treatment plant (WWTP) exceeds the design capacity of the plant. In September, 2004, the grit chamber at the plant flooded, resulting in raw wastewater being discharged to the ground surface at that location. This un-permitted discharge of wastewater poses potential health, safety and regulatory concerns for the City.

The recently upgraded wastewater treatment plant is designed to treat up to 1026 gallons per minute during peak flow conditions. The stormwater collectors identified within the PER are estimated to contribute up to 8,250 gallons per minute through the duration of a 2-year storm event. Larger storm events contribute even more flow. Because storms are typically short lived events, some of that flow is buffered within the tanks at the treatment plant. However, the impact is significantly weakened influent, making treatment much more difficult. Flooding of the WWTP grit removal and head-works facilities will continue to occur if these stormwater collectors are not disconnected from the sanitary sewer system.

The project includes installation of:

- Approximately 5,820 lineal feet of new stormwater piping,
- 29 new manholes,
- 20 new storm interceptor inlet structures,
- 2 sediment separators, and
- 2 new Prickly Pear Creek discharge structures.

The Water Pollution Control State Revolving Fund (SRF) loan program will help fund the project, which is expected to cost approximately $530,000. The City has been notified that the SRF program can fund this project with $300,000 of the American Recovery and Reinvestment Act (ARRA) funds, of

which $156,000 will be forgiven upon completion of construction and the remaining $144.000 will be borrowed at a 20-year low interest rate (0.75%) from the SRF/ARRA account. The balance of funds needed, up to $230,000, will be from City reserve funds. The financial impact of this project is supported by the existing City wastewater rate structure and no rate increases are anticipated.

Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species and historical sites are not expected to be adversely impacted as a result of the proposed project. Additional environmental impacts related to land use, water quality, air quality, public health, energy, noise, and growth were also assessed. No significant long-term environmental impacts were identified. Under the Montana Water Pollution Control State Revolving Fund Act, the DEQ may loan money to municipalities for construction of storm drainage systems and to separate sanitary sewer and storm drain flow (combined sewer systems).

The new storm drainage improvements will be constructed using standard construction methods and to minimize or eliminate pollutants during construction, best management practices will be implemented. A construction-dewatering permit from the DEQ may be required prior to construction. A Section 404 permit from the U.S. Army Corp of Engineers and a 124 permit from the Montana Department of Fish, Wildlife and Parks will most likely be required for work within the high water mark of Prickly Pear Creek. A permit for construction in the floodplain of Prickly Pear Creek will most likely be required from Lewis & Clark County or the DNRC.

The MDEQ, Technical and Financial Assistance Bureau (Department), has prepared this Environmental Assessment (EA) because the Department received a Preliminary Engineering Report for its review and written approval and an application for a State Revolving Fund (SRF) loan for the project. The Department is currently reviewing this information. If complete, a written approval will be prepared and provided to the City. This EA has been prepared to satisfy the requirements of the Montana Environmental Policy Act (MEPA) and the National Environmental Policy Act (NEPA).

D. COMMENT PERIOD

Thirty (30) calendar days.

II. PURPOSE OF AND NEED FOR ACTION

The East Helena WWTP, which discharges to Prickly Pear Creek, was recently upgraded to an extended aeration, activated sludge treatment system to provide needed capacity and to improve treatment for compliance with more stringent discharge limits contained within the facility discharge permit (MPDES No. MT0022560).

Currently, stormwater is collected along the Main Street corridor, transmitted into the sanitary sewer system and ultimately to the WWTP, where it poses significant treatment problems. The increase in flow to the WWTP during storm events, results in the design capacity of the WWTP being exceeded, which negatively impacts treatment and weakens the influent wastewater strength, resulting in difficulty with nitrification of ammonia, a critical permit requirement at the WWTP. Stormwater also carries sediment and grit to the WWTP, resulting in unnecessary wear on pumps and other equipment. In September 2004, a large storm event resulted in an overflow within the head-works at the WWTP and raw wastewater was discharged to the adjacent ground surfaces for a short duration.

Federal Register section 59 FR 18688 administered by the US EPA strongly encourages separation of storm sewers and sanitary sewers as a means of preventing combined sewer overflow events, such as the one mentioned above. This national policy was implemented in April, 1994 by the US EPA to establish targets and goals for communities known to have combined sewer systems. Department design standard DEQ 2, establishes that no new combined sewer systems may be constructed and where modifications are proposed, existing combined sewer systems must be separated.

FIGURE 1
LOCATION MAP

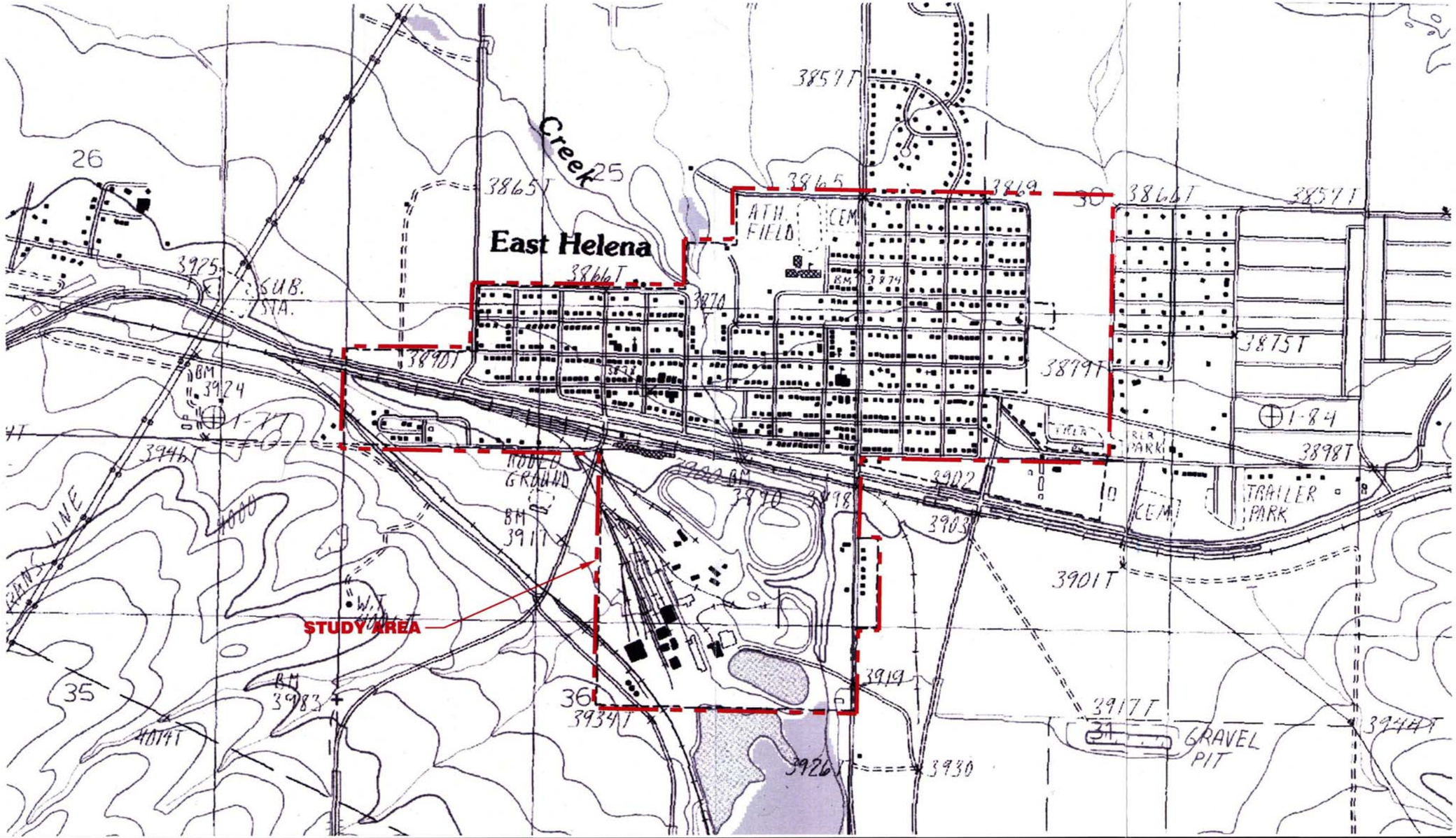

FIGURE 2
PLANNING AREA

500 0 500 1000
(SCALE IN FEET)

East Helena Sewer Separation P.E.R.

STUDY AREA

Figure 2.A.1

Prepared by Robert Peccia & Associates

RPA

SYM	REVISION	BY	APPR.	DATE

T. COWAN, P.E. — DESIGNED BY
OCT. 2009 — DATE
K. ARK — DRAWN BY
09805 — PROJECT NO.
B. KOENIG, P.E. — CHECKED BY
PROJECT-OVERVIEW — FILE

PROJECT TITLE
EAST HELENA SEWER SEPARATION
East Helena, Montana

SHEET TITLE
PROJECT OVERVIEW

SHEET
G-4
OF

PRICKLEY PEAR CREEK
W. GAIL ST.
W. GROSCHELL ST.
W. MAIN ST.
MAIN ST.
WEST MAINLINE
EXISTING DROP INLET REMOVAL
EXISTING DROP INLET REMOVAL
EAST MAINLINE
PRICKLEY PEAR CREEK

100 0 100 200
(SCALE IN FEET)

FIGURE 3
NEW STORMWATER COLLECTION SYSTEM
(SHOWN IN RED)

F:\waste\09805 – East Helena Sewer Separation\09805_East Helena Sewer Separation-C3D\CADD\Sheets\PROJECT-OVERVIEW.dwg Oct 12, 2009

III. ALTERNATIVES INCLUDING THE PROPOSED ACTION

A. SEWER SEPARATION TECHNOLOGIES CONSIDERED

There were three alternative approaches and the "no action" alternative considered in the PER. The alternatives evaluated included the following:

1. NO ACTION – The continued collection and diversion of stormwater into the sanitary sewer system will result in flooding at the WWTP head-works and excessive wear on pumps and equipment at the WWTP. In addition the community could continue to be out of compliance with state and federal policy on separation of stormwater and domestic wastewater. Therefore, this alternative was not considered to be viable.

2. INCREASE CAPACITY AT THE WWTP – This alternative considered increasing the capacity of the WWTP to handle storm surges. The costs for increasing the size of the WWTP would be in excess of $1 million dollars. Also, this alternative would leave the existing combined sewers in place in opposition to current design standards and national policy with regard to combined sewer separation. Therefore, this alternative was not considered to be viable.

3. PIPE STORMWATER ACROSS MAIN STREET AND SURFACE DRAIN TO THE NORTH – This alternative would utilize existing stormwater drop inlet structures and simply collect and route stormwater from the south side of Main street via piping to the north side of Main Street, where it would be allowed to surface drain to the north following existing topography. This alternative would result in localized flooding along the Main Street corridor and may result in overtopping of the road and resultant flooding. This alternative was further considered within the planning document.

4. INSTALLATION OF NEW STORMWATER COLLECTION SYSTEM ALONG MAIN ST. CORRIDOR WITH DISCHARGE TO PRICKLY PEAR CREEK – This alternative consists of new stormwater collection system along the south side of Main Street both east and west of the Main Street Bridge. The alternative involves installation of 5,820 lineal feet of new stormwater piping, 29 new manholes, 20 new storm inlet structures, 2 sediment separators and 2 new discharge structures to Prickly Pear Creek. All existing storm inlets along Main Street will be disconnected from the wastewater collection system. This alternative was further considered within the planning document.

B. COST COMPARISON USING PRESENT WORTH ANALYSIS

Present worth analysis is a method of comparing alternatives in present day dollars and is used to determine the most cost-effective alternative. An alternative with low initial capital cost may not be the most cost efficient project if high monthly operation and maintenance costs occur over the life of the alternative. Summaries of the present worth analyses for feasible alternatives are provided in Table 1. Salvage values were determined to not be applicable and therefore are not presented. An interest rate of 6.0% over the 20-year planning period (Design Year 2029) was used in the analysis.

TABLE 1 - ECONOMIC EVALUATION OF TREATMENT ALTERNATIVES

Alternative Number (From Above)	Alternative	Total Capital Cost For Alternative	Increase in Yearly O&M	Total Present Worth
A.3	PIPE STORMWATER ACROSS MAIN STREET AND SURFACE DRAIN TO THE NORTH	$456,600	$3,294	$494,382
A.4	INSTALLATION OF A NEW STORMWATER COLLECTION SYSTEM ALONG MAIN ST. CORRIDOR WITH DISCHARGE TO PRICKLY PEAR CREEK	$530,000	$1,918	$552,000

Costs for the proposed improvements are estimated to be $530,000. The City has been notified that the SRF program can fund this project with $300,000 of the American Recovery and Reinvestment Act (ARRA) funds, of which $156,000 will be forgiven upon completion of construction and the remaining $144.000 will be borrowed at a 20-year low interest rate (0.75%) from the SRF/ARRA account. The balance of funds needed, up to $230,000, will be from City reserve funds. The financial impact of this project is supported by the existing City wastewater rate structure and no rate increases are anticipated.

C. BASIS OF SELECTION OF PREFERED ALTERNATIVE

Selection of the preferred alternative was based upon multiple criteria, both monetary and non-monetary. Ranking criteria used are displayed in Table 2.

TABLE 2 – ALTERNATIVE COMPARISON

Comparison Criteria	A.3 PIPE STORMWATER ACROSS MAIN STREET AND SURFACE DRAIN TO THE NORTH	A.4 INSTALLATION OF A NEW STORMWATER COLLECTION SYSTEM ALONG THE MAIN STREET CORRIDOR WITH DISCHARGE TO PRICKLY PEAR CREEK
RELIABILITY	Not as reliable – may cause localized flooding issues	Very reliable
EXPANDABILITY	Can not be expanded	Provides base of stormwater collection system within the City
REGULATORY COMPLIANCE	Achieves separation goals, but would be discouraged by DEQ and likely not funded.	Achieves separation goals and would qualify for DEQ funding.
COST	Lower capital cost but slightly higher annual O&M costs.	Slightly higher capital cost, but lower annual O&M costs.

Alternatives A.3 (Pipe Stormwater Across Main Street) and A.4 (Install New Stormwater Collection System) were compared relative to one another, based on the following criteria: cost, regulatory compliance, expandability and reliability. Although alternative A.3 is less expensive in terms of cost, alternative A.4 offers several advantages as outlined above. Alternative A.4 is more reliable in that it alleviates the surface flooding issues along Main Street, whereas alternative A.3 could "relocate" the flooding problems from the south side to the north side of Main Street. During heavy rainfall events, it is possible that this surface flooding could result in private property damage and thus liability claims against the City. In the event of such claims, the cost to the City could escalate, easily off-setting the difference in initial capital cost to construct the improvements. **Therefore, alternative A.4 was chosen as the preferred alternative.**

IV. AFFECTED ENVIRONMENT

A. PLANNING AREA / MAPS

The City of East Helena is located in west central Montana, on US Route 12, approximately one mile east of the Helena city limits (see Figure 1). The planning area boundary is shown in Figure 2 and includes the incorporated boundary of the City that will directly benefit from the project. The planning area includes residential homes, vacant lots, commercial businesses and public entities. As shown in Figure 3, the new stormwater collection and discharge system is located running east/west along Main Street and north/south along Morton Street within the city limits and within the planning area. The duration of construction for the proposed new treatment facility should be approximately 2 months, but it is possible there could be a winter shut-down period which could delay completion.

B. FLOW PROJECTIONS

The project will divert storm flow (currently being carried to the WWTP) to Prickly Pear Creek. An analysis contained within the PER assesses the 2-year storm size relative to the new stormwater collection piping and appurtenances. The system is designed to collect and carry stormwater to two separate discharge locations. The stormwater section along Main Street, east of the Main Street Bridge, will discharge to Prickly Pear Creek just upstream of the Main Street Bridge. The stormwater section west of the Main Street Bridge will collect and carry flow north along Morton Avenue and discharge into Prickly Pear Creek at the north end of Morton Avenue.

The PER projects that the discharge to Prickly Pear Creek upstream of the bridge will result in a flow contribution of 11.04 cubic feet per second during the 2-year design storm. The discharge at the north end of Morton Avenue would contribute a flow of 7.34 cubic feet per second during the 2-year design storm.

A "Small Municipal Separate Storm Sewer (MS4)" discharge permit is not required for the project. This type of discharge permit is currently only required for municipalities defined with the Administrative Rules of Montana (ARM 17.30 Subchapter 11) as those with a population greater than 10,000. However, a stormwater permit associated with the stormwater construction activity will need to be secured.

C. NATURAL FEATURES

The existing WWTP consists of an extended aeration, activated sludge treatment facility that discharges to Prickly Pear Creek west of the treatment plant and downstream from the community.

Land use within the study area is completely urban. The urban classification includes residential, commercial and industrial land uses. Agricultural areas surround the study area and are used primarily for fallow cropping and grazing. Site topography is generally flat or gently sloping to the northwest along the Prickly Pear Creak drainage.

The geology within the study area is comprised of two types of soils. These are alluvium deposits and lake bed deposits. The alluvium consists of broad, gently sloping alluvial fans formed by Prickly Pear Creek and they contain fragments of rocks present in the drainage basin of the stream that formed the deposit. The tertiary lake bed deposits are composed mainly of light-colored clay with inter-bedded sand and gravel.

Groundwater within the study area varies in depth from between 8 to 90 feet based on well logs from 23 domestic wells within the study area. Groundwater quality is moderate to highly turbid with high iron content and is generally not considered suitable as a drinking water source. The City of East Helena receives its domestic water from two groundwater wells southeast of the community near McClellan Creek, with back-up wells located in the Helena valley, north of the City.

VI. ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT

A. DIRECT AND INDIRECT ENVIRONMENTAL IMPACTS

1. Land Use – There will be no impact to land use due to the proposed project. The proposed improvements will be constructed within the right-of-way and disturbed areas of the urban landscape of East Helena. All proposed work is located within property under easement or ownership of the City of East Helena, or the Montana Department of Transportation. Prime farmland will not be impacted as a result of this project.

2. Floodplain – The project is located partly inside of a delineated 100-year floodplain according to the FEMA Floodway Map provided within the PER. Therefore, this project will require a floodplain development permit. The DNRC, Floodplain Program representative did not feel the project posed any floodplain concerns. Therefore, no significant affect is anticipated.

3. Wetlands – No wetlands exist within the immediate area or adjacent areas. Therefore wetlands will not be affected by the proposed project.

4. Vegetation – Vegetation will not be significantly affected by the proposed project. The Montana Natural Heritage Program listed wedge-leaved saltbush as the only identified plant of concern within the project area. It is not anticipated that the project would result in significant affects to vegetation.

5. Cultural Resources – According to the Montana State Historic Preservation Office (SHPO), there appears to a low likelihood cultural properties will be impacted within the project area.

6. Fish and Wildlife – The US Fish and Wildlife Service concluded that they did not anticipate any impact to threatened or endangered species. Bald eagles were identified as the only threatened or endangered species within the area, but the USFWS does not anticipate any project related adverse impacts. Aquatic and animal life will not be significantly affected by the proposed project. The project will not significantly affect any wildlife habitats and will provide water quality benefits that protect and reduce the risk of harm to fisheries and other animals.

7. Water Quality – Water quality will not be negatively impacted due to the project. The project will utilize best management practices. Prickly Pear Creek at the point of discharge is classified as an "I" stream segment under Montana's stream classification standards. This reach of Prickly Pear Creek is listed as impaired for uses including; agriculture, aquatic life, cold water fishery, drinking water, industrial, primary contact recreation and warm water fishery.

   A TMDL for this stream segment was completed as a portion of the Lake Helena TMDL. The TMDL was completed by the US EPA in 2006 and established a prescription for restoring the Lake Helena watershed. Fish and aquatic life designated uses are not meeting their full potential due to excessive levels of sediment covering fish spawning and macroinvertebrate (aquatic insect) habitat, filling pools, and altering stream channel morphology. The source of these sediments are; human-caused erosion (primarily from unpaved roads), agriculture, timber harvest, streambank erosion, abandoned mines, non-system roads and urban areas. The TMDL goals are to reduce sediment loading from each of the significant human-caused sources. Utilizing best management practices to remove sediment prior to discharge to Prickly Pear Creek allows the project to achieve the TMDL goal.

8. Air Quality – Short term negative impacts on air quality will occur during construction from heavy equipment in the form of dust and exhaust fumes. Proper construction practices will minimize this problem. Project specifications will require dust control. There will be no long-term impacts to air quality.

9. Public Health – Public health impacts will be minimized with the proposed project. The project separates stormwater flow from the sanitary sewer system. This results in improved treatment of domestic wastewater, less risk of overflow at the WWTP and lessened risk of pathogen exposure to plant operations staff and the public.

10. Energy – A direct short-term impact on energy resources will occur during construction. In the long-term, a slight decrease in energy will occur due to having to pump and disinfect less water at

the WWTP during storm events.

11. Sediment Disposal – The sediment collected within the sediment traps, which are a design feature of the project, will be periodically removed with a vacuum truck and disposed of at an approved landfill site. Maintenance of these sediment traps will be established during the design and construction phase of the project and an Operations and Maintenance manual will be prepared to ensure proper maintenance is scheduled.

12. Noise – Short-term impacts from excessive noise levels may occur during the construction activities. Construction will be limited to normal day-time hours to avoid early morning or late evening construction disturbances. In the long-term, noise levels will remain unchanged.

13. Growth – Growth within the City of East Helena averaged 0.67% per year between 1990 and 2000. The study area population growth rate for this same period was 1.73% per year. It is estimated that the City of East Helena experienced a 0.8% rate of growth per year between 2000 and 2003. The project is not anticipated to have any significant affect on the location, distribution, density or growth rate within the planning area.

14. Environmental Justice – Environmental Justice Executive Order 12898: The proposed project will not result in disproportionately high or adverse human health or environmental effects on minority or low income populations.

15. Cumulative Effects – Sediment reduction within the planning area and within the Lake Helena watershed is a cumulative goal. The project has considered the TMDL for Prickly Pear Creek and Lake Helena and achieves the goals of the TMDL. The East Helena WWTP will more reliably be able to nitrify ammonia within the facility prior to discharge to Prickly Pear Creek, resulting in an improvement in discharge water quality. No significant adverse impacts are anticipated.

B. UNAVOIDABLE ADVERSE IMPACTS

Short-term construction related impacts (i.e., noise, dust, traffic disruption, etc.) will occur, but should be minimized through proper construction management. Energy consumption during construction cannot be avoided.

VII. PUBLIC PARTICIPATION

A presentation on the draft Preliminary Engineering Report (PER) was made to the City of East Helena at an April 5, 2005 public hearing by the City's consulting engineers and a second public meeting was conducted on May 17, 2005 to discuss the recommendations in the PER. There was no opposition to the project documented within the public meeting process. The recommendation was to adopt a Resolution to accept the Engineer's PER and proceed to apply for funding. The City council voted to accept the PER and proceed to pursue funding during the council meeting immediately after the second public hearing.

VIII. AGENCY ACTION, APPLICABLE REGULATIONS AND PERMITTING AUTHORITIES

No additional permits will be required from the State Revolving Fund (SRF) section of the DEQ for this project after the review of the submitted plans and specifications. However, coverage under the storm water general discharge permit and groundwater dewatering permit is required from the DEQ Water Protection Bureau prior to the beginning of construction. A Section 404 permit from the U.S. Army Corp of Engineers and a 124 permit from the Montana Department of Fish, Wildlife and Parks will most likely be required for work within the high water mark of Prickly Pear Creek. A permit for construction in the floodplain of Prickly Pear Creek will most likely be required from Lewis & Clark County or the

DNRC.

IX. REFERENCE DOCUMENTS

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

1. City of East Helena, Sewer Separation Project PER, prepared by Robert Peccia & Associtates, Helena, Montana, April 2005.
2. Contract Documents and Specifications, prepared for the City of East Helena, by Robert Peccia & Associtates, Helena, Montana, October 2009.
3. Uniform Application Form for Montana Public Facility Projects for the City of East Helena, MT Sewer Separation Project, November, 2009.

X. AGENCIES CONSULTED

The following agencies have been contacted in regard to the PER, which determined the basis for the proposed wastewater treatment and collection system project:

1. The Montana Department of Fish Wildlife and Parks (FWP) was consulted, but did not respond to requests for comment. It is concluded they do not foresee any impacts to listed species of wildlife, or to nongame species of special interest or concern. A 124 authorization from FWP will likely be required to proceed with the construction of the outfalls from the stormwater project from FWP.

2. The U. S. Fish and Wildlife Service (FWS) was consulted, and responded on May 2, 2005. It concluded the proposed project would not negatively impact listed species, wetlands, or migratory birds and their habitats.

3. The Montana State Historic Preservation Office (SHPO) considered the impacts of the proposed project on historical sites and cultural resources and concluded there is a low likelihood cultural properties will be impacted in a April 26, 2005 response letter. The Montana State Historic Preservation Office asks to be contacted and the site investigated should cultural materials be inadvertently discovered during construction.

4. The U.S. Army Corps of Engineers (COE) reviewed the proposed project and responded that if construction activities include the discharge of fill material, either permanently or temporarily into waters of the United State and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters, then a Department of Army Section 404 permit may be required. A 404 Permit authorization is likely to be required prior to construction of the stormwater outfalls into Prickly Pear Creek.

5. Montana Natural Heritage Program was consulted and responded on March 26, 2005. They identified the bald eagle as the only species of concern on the threatened or endangered species list. They also identified the wedge-leaf saltbush as a plant species of concern. No impacts to these two species are anticipated.

6. Department of Natural Resources and Conservation (DNRC) reviewed the proposed project and concluded that a floodplain permit would be required for portions of the project within the identified 100-year floodplain. They also concluded the project would not pose floodplain concerns in a May 3, 2005 email response from the Floodplain Program representative.

Recommendation for Further Environmental Analysis:

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

Rationale for Recommendation: Through the Preliminary Engineering Report and Contract Documents, prepared by Robert Peccia & Associates, and the public process involved, the City of East Helena determined the preferred stormwater separation project would ensure that the WWTP would not continue to receive periodic stormwater flow in excess of the design capacity of the plant. Through this EA, the MDEQ has verified none of the adverse impacts of the proposed stormwater separation project are significant; therefore an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607, 17.4.608, 17.4.609 and 17.4.610. This EA is the appropriate level of analysis because none of the adverse effects of the impacts are significant. A Finding of No Significant Impact (FONSI) will be issued and legally advertised in the local newspaper and distributed to a list of interested agencies. Comments regarding the project will be received for 30 days before final approval of the EA is granted.

EA Prepared By:

_____ _____

Terry Campbell, P.E. Date

Approved By:

_____ _____

Mike Abrahamson, P.E. Date