



Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718

August 19, 2009

To: Governor's Office, Mike Volesky, State Capitol, Room 204, P.O. Box 200801, Helena, MT 59620-0801
Environmental Quality Council, State Capitol, Room 106, P.O. Box 201704, Helena, MT 59620-1704
Dept. of Environmental Quality, Metcalf Building, P.O. Box 200901, Helena, MT 59620-0901
Dept. of Natural Resources & Conservation, P.O. Box 201601, Helena, MT 59620-1601
Montana Fish, Wildlife & Parks:
Director's Office Parks Division Lands Section FWP Commissioners
Fisheries Division Legal Unit Wildlife Division Design & Construction
MT Historical Society, State Historic Preservation Office, P.O. Box 201202, Helena, MT 59620-1202
MT State Parks Association, P.O. Box 699, Billings, MT 59103
MT State Library, 1515 E. Sixth Ave., P.O. Box 201800, Helena, MT 59620
James Jensen, Montana Environmental Information Center, P.O. Box 1184, Helena, MT 59624
Janet Ellis, Montana Audubon Council, P.O. Box 595, Helena, MT 59624
George Ochenski, P.O. Box 689, Helena, MT 59624
Jerry DiMarco, P.O. Box 1571, Bozeman, MT 59771
Montana Wildlife Federation, P.O. Box 1175, Helena, MT 59624
Wayne Hurst, P.O. Box 728, Libby, MT 59923
Sam Little, Jefferson County, P.O. Box H, Boulder, MT 59632
Jim & Maxine Molenda, PO Box 2, Whitehall, MT 59759
Cardwell Store & RV Park, Mr. Sonny Huckaba, P.O. Box 55, Cardwell, MT 59721
Senator Terry Murphy, 893 Boulder Cutoff Rd., Cardwell, MT 59721
Camp Three Forks, 15 KOA Road, Three Forks, MT 59752
Mr. & Mrs. Harvey & Paige Perez, P.O. Box 1009, Whitehall, MT 59759
Sarah Bannon, Gold West Country, 1105 Main Street, Deer Lodge, MT 59722

Ladies and Gentlemen:

The enclosed Decision Notice has been prepared for the Lewis & Clark Caverns Campground Improvement Project Draft Environmental Assessment. Montana Fish, Wildlife & Parks (FWP) proposed to install approximately (9) campsite electrical pedestals within campground Loop E at Lewis & Clark Caverns State Park. This project will improve (9) of the (40) existing campsites or 23% of the available sites within the Park. Additionally, the proposed project will include electrical infrastructure improvements, such as an electrical panel, to support the new pedestals. Ten (10) public comments were received during the comment period that began June 24, 2009 and ended July 24, 2009.

The EA and Decision Notice may be obtained from FWP at the address provided above, or viewed on FWP's Internet website: <http://www.fwp.mt.gov>.

Based on the Environmental Assessment, public comment, and FWP evaluation, it is my decision to proceed with the project as described above, namely install electricity in 9 campsites at the Park.

Questions regarding this Decision Notice should be addressed to:
Montana Fish, Wildlife & Parks
C/O Gerald Walker
1400 S 19th Avenue
Bozeman, MT 59718

Or e-mailed to: walker@mt.gov

Sincerely,

Gerald Walker
Regional Park Manager



Montana Fish, Wildlife & Parks

Region Three Montana Fish, Wildlife & Parks
1400 South 19th Ave
Bozeman, MT 59718
August 19, 2009

Decision Notice for Lewis & Clark Caverns State Park Improvement Project (Revised Version) Draft Environmental Assessment

Proposed Action

Montana Fish, Wildlife & Parks (FWP) proposes to install approximately (9) campsite electrical pedestals within campground Loop E at Lewis & Clark Caverns State Park. This project will improve (9) of the (40) existing campsites or 23% of the available sites within the Park. Additionally, the proposed project will include electrical infrastructure improvements, such as an electrical panel, to support the new pedestals.

Montana Environmental Policy Act

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess significant potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, an Environmental Assessment (EA) was completed for the proposed project by FWP and released for public comment on June 24, 2009.

Public comments on the proposed project were taken from June 24 through July 24, 2009. The EA was mailed to 21 individuals and groups. In addition, the public was notified of the public comment period for this EA by the following methods:

- Two public notices in each of these papers: *Helena Independent Record*, *Butte Standard*, and *Bozeman Daily Chronicle*
- One statewide press release
- Public notice on the Fish, Wildlife & Parks web page: <http://fwp.mt.gov>.

Summary of Public Comment

The proposed project received ten (10) comments from the public. Seven (7) comments expressed support for the proposed project. The most frequently mentioned beneficial outcomes of the installation of electrical service at a limited number of campsites included elimination of generator noise and the ability to operate electrically dependent medical equipment and accommodate people with disabilities. Three (3) comments received were opposed to the proposed project, and all cited competition with privately owned campgrounds in the vicinity (Cardwell and Three Forks).

Comments Supportive of the Proposed Project: Seven (7) Total

Seven comments were supportive of the proposed action, namely to installed electrical service to 9 campsites (out of 40) in Lewis & Clark Caverns State Park campground.

Supportive Comment Statements

We have camped here four times and plan to visit more in the future. We use tents and require no electrical service.(And we are both over 60) One of the negative aspects of camping, as opposed to RV'ing (This problem is not unique to Lewis and Clark) is the use of generators that create both noise and air pollution.

We would support the electrification of selected areas of the campground, if when the electrified loop(s) are full, anyone planning on using a generator would locate at another nearby campground, rather than be allowed to stay at a non-electrified site and continue to operate generators, as is the current procedure.

One other concern is, will the rates for tenters go up and subsidize the electrical units, or will there be a sliding scale that increases with the use of electrified sites?

FWP Response: The sites with electricity will have a higher camping fee than those sites without electricity.

I want to comment regarding the proposed electrical pedestals at Lewis & Clark SP and Black Sandy. Electric sites at Mt. State Parks is WAY past due. Please don't limit it to just these two parks, after all this is the 21st century. To expand just a little, my husband and I are well into our 70's and are avid motor-home campers. My

husband has health issues which requires the use of electrically operated medical equipment several times a day. We love the State Park setting but unfortunately we have been unable to enjoy them due to the lack of electrical availability. Please, please don't let the private campground owners again deter you from adding this amenity to our State Parks. I'm looking forward to electrical availability at our State Parks. Thanks!

FWP Response: So noted.

*I know this is late -
but I am in favor of the
improvements - we stayed
there on July 16th -*

FWP Response: So noted.

Lynette Kemp: This message is to add the support of the Gallatin Good Sams RV Club to your efforts to obtain permission and funding needed to add electrical service to some or all of the RV sites at the Lewis & Clark Caverns State Park.

As you are aware, our group has visited a number of times in past years to enjoy a camp-out and, in many cases, lend our help to park maintenance personnel to accomplish a number of tasks at the park. These visits have been beneficial to our group as a very nice place to spend a few days twice a year. We believe that this has also been of great help to Lewis & Clark Caverns State Park maintenance, allowing them to keep the park in nice condition it is.

Although we received your request for input at a late date (received it on last Monday), the group, numbering 30 at our July meeting yesterday, were in unanimous agreement to add our support to your efforts to add electricity to some sites in your park. Since most of our members are in an advanced stage of life, there are certain of them that, for medical reasons, require power to operate oxygen generators or other medical apparatus. Thus, this gives us an added incentive to support this effort.

We wish you the greatest of success in your efforts to accomplish a positive outcome in securing the permission and where-with-all to complete this project. If we can help further, please contact us.

FWP Response: So noted.

I am in favor of installing electricity pedestals in State Park campgrounds. I believe electricity would be of benefit not only to those with RV's but to those who say they want a "quieter, natural like experience". I think if electricity was available there would be virtually no noise from generators. If one is plugged into electricity there is no need to run a generator to re-charge batteries.

I have camped in Oregon State Parks (they have electricity) on numerous occasions and you just don't hear generators. We also camp at the BLM Campgrounds on Holter Lake and you can hear generators almost anytime.

I am willing to pay the extra \$5 fee for electricity.

I also think there is no need to install street lights. Keep the dark night sky as much as possible.

As far as the state competing with private facilities, there are no private facilities at many of the lakes and parks. I think it is almost a non-issue and certain Legislators make comments just to protect specific individuals at the expense of the vast majority of Montanans.

FWP Response: The installation of street lights is not a part of this proposal.

My husband and I are members of the Gallatin Good Sams. We camp at the Lewis and Clark Caverns campground about twice a year. It is wonderfully maintained. Keep up the good job. We believe electricity should be added to a small number of sites. This would make it easier for people with disabilities to enjoy the campground. Please consider our request.

FWP Response: So noted.

I am a member of the Gallatin Good Sams and I want to express my feelings about the elect hookup in the Lewis and Clark campground.

I am in favor of putting in these hookups. I think it would be a great improvement. Hoping this will help you in this endeavor :We are::

FWP Response: So noted.

We are a local family that enjoys visiting the park and participating in the numerous activities offered at that site. We enjoy camping, especially with our grandchildren. We own an RV that we usually use when we visit the park. Our family likes to stay overnight; this provides us with an opportunity to have many short "vacations" throughout the summer. We are senior citizens and as such are subject to some of the limitations that come with age. One member of our family needs to use a CPAP breathing machine at night, he cannot be without it. This machine uses electricity so we must plan any overnight camping trips with that requirement in mind. The park personnel have been extremely gracious; as they have let us hook up to the electricity in the pavilion once or twice when no other group has reserved the pavilion. Otherwise have to leave after the activity that we came to enjoy was concluded. We have made this work, except for the nights of the stargazing, which is an activity that the whole family is into and leaving late at night when others in the park are trying to sleep can be an inconvenience for all. If the park offered electricity we would be able to visit the park more often and stay overnight as we so much enjoy doing. I'm sure we are not the only family that has medical needs for electricity, therefore; personally we are in favor of electrification of Loop E.

In addition, we have reviewed the Environmental Assessment Draft and do not see any reason, after the initial installation disturbance that adding this service would in any way increase any negative impact upon the park. In fact we can see that more people would enjoy visiting the park if that service was available.

Thank you for the opportunity to express our views on this matter.

Comments in Opposition to the Proposed Project: 3 total

Opposition Comment Statements

Public Comment to FWP

I am opposed to the electrification and paving of any public campground. The last thing I want to see, ~~is~~ whether in a tent or R.V. is blacktop pavement in front of my campsite. I don't care what campground I go to in Montana I especially don't want to see outdoor lights. Your turning real campgrounds into a commercial operations. You people ~~are~~ (FWP) have done an excellent job creating beautiful campgrounds for a reasonable price. There are much more important things we could be spending \$726,000² on. I'm also in big disagreement with the extremely short comment period. The person responsible for this should be fired from his job. Maybe there needs to be a law against anything less than 3-weeks. Your right, during the peak of summer when a lot of people are on vacation or are in the hectic process of getting ready for there summer vacation what better time and way to ram this thru. I'll call my legislator.

FWP Response: Camping is not about "roughing it" to many visitors who may want to watch a weather report or a Disney movie with their grand kids during a rainy day. Electrical service in some sites will help make experiences and memories better. The comment period for the Lewis & Clark Caverns State Park Improvement Project was 31 days (June 24, 2009 through July 24, 2009)

RE: Public Comments on Draft Environmental Assessment, Lewis & Clark Caverns State Park Campground Improvement Project

Hello,

Camp Three Forks would like to provide the following comments and questions regarding the draft Environmental Assessment for the Lewis & Clark State Park Campground Improvement Project, as released for public comment on June 24, 2009. In addition, we would like to make a specific request for information: we would like to receive a copy of the Lewis & Clark State Park Management Plan. *packaged 07/17 for mail 07/20/09*

1. The draft EA notes that the Park Management Plan requires the agency to make an effort to not compete with local businesses. However, since the goal of the project is “to increase revenue” generated by the Park, where is this revenue increase expected to come from? If not from business currently occurring from local businesses, then where? Is adding electrical hookups to the Park expected to simply increase tourism in Montana, so that local private campgrounds would not experience a decline in business due to Park improvements?
2. We would not object to campground improvement where a “destination campground” is affected, such as an area that is very

popular with fishing. However, the Lewis & Clark Caverns State Park is not a destination campground. It is simply there because of daily visits to the caverns. So Fish, Wildlife and Parks is not trying to increase the length of stays, and provide a needed public service, at a destination campground. Instead, the agency is simply trying to increase their share of the tourists dollars by providing more overnight services. This seems to be a direct conflict with local businesses.

3. The State Park will have a significant competitive advantage with the provision of electrical hookups. The Park fee will be \$20, while the Camp Three Forks fee for electrical is \$32. How can this be fair competition when the State Park is being subsidized by the Montana taxpayer?
4. The draft EA needs to include a valid analysis of competition and reduced income to local businesses that may result from the Park improvement with electrical hookups. There is no such analysis in the EA. We would recommend that some outside expertise be provided for such an analysis, to avoid agency bias. At a minimum, some type of economic analysis is needed to address this issue of FWP competing with local businesses.
5. The EA suggests that electrical hookups are needed not only to increase Park revenue, but to reduce conflicts within the Park regarding generators. We suggest, however, that generators will be run by campers unless prohibited by Park rules. And second, there will always be people that want to save money by using their generator rather than paying for an electrical hookup. So the problem of generators will not be solved simply by adding electrical hookups.
6. Just because the public would like to have cheap camping rates where electricity is provided does not justify the FWP's decision to increase competition with local private businesses. There are many, many private campgrounds in Montana where electricity is available, so State Parks are not filling some void in camping facilities.
7. The draft EA claims that there will be no impact to local businesses because of the small number of electrical sites to be constructed. However, it is noted that the Park expects to increase camper nights by almost 900 camper nights, based on a 75% occupancy rate of 9 electrical sites for a 130 day camping season. If on average a local campground has 3,000 camper nights, a potential reduction of up to 900 camper nights would be a significant impact. The Park needs to define specifically how financial impacts to private campgrounds are being measured in a valid, quantifiable manner.

8. The draft EA suggests that Camp Three Forks will not experience any loss in revenue because our facility provides full hookups, a swimming pool, and WIFI. However, many of our campers do not use a full hookup sight, and even fewer campers ever use the swimming pool. This use is largely associated with mid-summer campers who are traveling with children, who are just stopping for the night. Also, many folks now obtain their own internet access along with their phone service.

In summary, we view the proposed improvements to the Lewis and Clark Caverns State Park as direct competition with Camp Three Forks, and are opposed to this project.

FWP Response: This project reflects the changing needs and values of state park visitors. Every recreational vehicle sold today has provision for electrical connections. Montana State Parks wants to attract campers that are desirous of camping in a state park setting. Lewis and Clark Caverns State Park has greatly increased activities and programs in an effort to make the campground a destination site. FWP has touted the Lewis & Clark Caverns campground as a central location and directed travelers to the many attractions in the vicinity in an effort to increase the number of days people stay in the area. The Park will consider prohibiting the use of generators in the campground with the installation of electricity in nine campsites.

I recommend Alternative A: No Action. This proposal is just as unacceptable as it was last year. To claim it will not put the State of Montana into direct competition with private, taxpaying businesses is plainly ridiculous. Of course it will. This violates an understanding that has guided State policy since the early 1970's, that I am personally aware of. It could be longer. I note some interesting differences between the new Draft Environmental Assessment and the one sent out last year. I will ask some specific questions, and I hope you will answer them well before the July 24th deadline for comments. Last year the cost was projected at \$79,000. This time the figure is \$50,000. Please explain. Last year the expected increase in revenue was claimed to be a bit over \$2,500 annually, which is not even interest on \$79,000. The new information doesn't even mention increased revenue, just gives a gross net revenue figure of \$14,040 per year. This is grossly misleading, making it seem like you can spend \$50,000 and receive a return of over \$14,000 per year. Heck of a deal! Please explain. The truth, of course, is that you are already set up to receive most of the \$14,000 without spending anything, or changing anything. This proposal is really unfair to Jefferson County, to the taxpayers of Jefferson County, and especially to the taxpaying private campground owners you'd be competing with, and who already have made a huge investment in their businesses without the benefit of a big subsidy from a State Agency. Please answer quickly the points made about the strange financial figures. Sincerely,

FWP Response: The installation costs were refined based on bids received at other Montana State Parks (Cooney, Tongue River Reservoir & Hell Creek state parks) where electricity for campers was provided in the past couple of years.

Decision

Based on the Environmental Assessment, public comment, and FWP evaluation, it is my decision to proceed with the campground improvement project as described in the EA, namely install approximately (9) campsite electrical pedestals within Loop E at Lewis & Clark Caverns State Park.

Appeal

This project is subject to appeal, which must be submitted to the FWP Director (Mr. Joe Maurier, Director, Montana Fish, Wildlife & Parks, PO Box 200701, Helena, MT 59620-0701) in writing and postmarked within 30 days of the date on this decision notice. The appeal must specifically describe the basis for the appeal, explain how the appellant has previously commented to the department or participated in the decision-making process, and lay out how FWP may address the concerns in the appeal. If you have questions regarding this decision notice, please contact Gerald Walker, Regional Parks Manager at 406-994-3552.

Gerald Walker
Regional Parks Manager
