

Summary of Public Comments

State of Montana

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Topic: Partners and Stakeholder Consultation

Comment 1: Archie Harper, Valley Flood Committee -- Under Phase 2 Factor 1 (Capacity), the Department of Transportation should be identified as an essential partner for technical planning and coordination of projects especially where their infrastructure affects flood water timing and routing. We have observed situations where roads and associated hydraulic constrictions, including lack of by-pass features, exacerbate flooding and slow down flood drainage in the valley. Agencies responsible for transportation systems that alter flood behavior and natural drainage also should be engaged in helping provide solutions.

Response 1: Please see Page 12 of Factor 1, which identifies MDT as an additional agency partner.

Comment 2: Traci Sears, Floodplain Administrator, Department of Natural Resources and Conservation -- Add information about collaboration with other communities/groups.

Response 2: Please see Factor 1, which discusses work and collaboration by agencies statewide. Factor 3 discusses in detail how the proposed Resilient Montana program will collaborate with other communities and groups statewide.

Topic: Leverage

Comment 3: Nadene Wadsworth, Montana Disaster and Emergency Services, Montana Department of Military Affairs -- Might have federal projects which could be considered leverage. Will this project be able to be used as matching funds for other federal programs?

Would the Future Fisheries Program help this? No public assistance claims? A bridge has a life expectancy of 50 years.

Response 3: Please refer to Factor 4 for additional federal projects identified that can count as leverage, including the Laurel project through FEMA Public Assistance. Futures Fisheries monies were not able to be identified an eligible source of leverage. The BCA uses a very conservative estimate of 30 years for all projects, as specific projects have not yet been identified.

Comment 4: Pam Smith, Montana Department of Natural Resources and Conservation -- How do you want to see the projects' budgets between the 8 categories? Would like to have a conversation about what is considered planning for this project? Have multiple programs, which might be considered leverage. Yellowstone County, specifically at the intake structure? Are other areas where the flood affected the area eligible? Pryor Creek?

Response 4: Please refer to Factor 4 for additional projects identified by the Department of Natural Resources and Conservation as eligible for leverage. Only the portion of Pryor Creek in Big Horn County falls within an eligible MID-URN area.

Topic: Approach and Projects

Comment 5: Archie Harper, Valley Flood Committee -- Under Phase 2 Factor 3 (Critical Infrastructure), the VFC takes issue with the McHugh Bridge over Tenmile Creek because the structure failed to pass 25-year flood flows in 2011 diverting flood waters north, which then exacerbated flooding within residential areas and other transportation infrastructure.

Additionally the current bridge site is experiencing channel aggradation (alluvial deposition),

which we fear will continue diminishing the flow capacity of the current structure if not properly rectified. A replacement bridge should be designed to pass 100-year flood flows. Approximate price for a new bridge properly designed and installed at this site would be around \$150,000.

Plan for \$200,000 to cover design costs. There also may be a need to consult with a hydrologist to cover concerns about channel aggradation at that site. We request that you include this bridge into your application as an essential adjustment under the critical infrastructure and budget sections. Additionally, we emphasize that improving the existing drainage infrastructure through the Sewell subdivision be a priority as citizens in that small subdivision are at a distinct disadvantage economically to consider any discussions about a special flood improvement district. A by-pass channel option would cost over \$2.25 million and is likely preferred, but exceeds the local residents' ability to finance such a project via a local improvement district.

Response 5: At this time, the State not including specific projects in the grant application, only discussion of possible approaches. If awarded funds, the State will work with the Helena Valley with its interagency team to identify possible projects. Further discussion of this approach is located in Factor 3.

Comment 6: Archie Harper, Valley Flood Committee -- The VFC has done some research and we found a community, Hoboken, NJ, who have implemented a strategy that successfully meets the theme for flood resilience that would apply to the West Helena Valley. They (Hoboken) have embraced four pillars of resiliency: Resist, Delay, Store, and Discharge. The 2013 Lewis & Clark County Flood Mitigation Master Plan (Plan) addresses much – not all – of the delay, store, and discharge elements, but does nothing about the resist element (defense against flood surges). That is, nothing is proposed to confine more of the flood waters to the Tenmile corridor

before it leaves its channel. Instead the Plan only deals with flood waters after leaving Tenmile Creek. This project would require County involvement to acquire needed property or easements adjacent Tenmile Creek. Therefore, under the Phase 2 Factor 3 (Flood control) section, include language that speaks to the concept of a green infrastructure/elevated recreation trail system (levy) along Tenmile Creek that begins at Green Meadow Drive and extends downstream to Highway 15 or beyond the Law Enforcement Academy. It should minimally contain flood waters up to a 25 or 50 year flood event. Anything in excess over those flood flows could be discharged to the flood mitigation infrastructure as outlined in the Flood Mitigation Plan for the Helena Valley. A reasonable cost estimate for this item to add to your draft request of \$80.4 million (statewide) would be around \$2.5 or 3.0 million, not including consideration for land acquisition.

Response 6: At this time, the State not including specific projects in the grant application, only discussion of possible approaches. If awarded funds, the State will work with the Helena Valley with its interagency team to identify possible projects. Further discussion of this approach is located in Factor 3.

Comment 7: Jeannene Maas, Helena Valley Flood Committee -- Eight different buckets of funds; Can funds be moved between buckets? Health and Safety; where did health and safety factor into the budget? Which budget? Things we have under-proposed financially for this project; can we increase this information?

Response 7: At this time, the State does not anticipate that funds will be able to be moved between project categories; however this is subject to change pending the terms and conditions of the grant award. Health and safety was considered qualitatively throughout the Factor 2 and 3

narratives, and is inherent to many of the issues discussed in the BCA. The general cost estimates identified through the targeted MID-URN meetings are not binding. As discussed in Factor 3, the State is committed to expending as many CDBG-NDR dollars as we realistically can to meet resiliency needs in each community. If funding shortfalls remain once projects are identified, the State is committed to assisting communities in the identification of other funding sources.

Topic: Draft Narrative Content

Comment 8: Nadene Wadsworth, Division of Disaster and Emergency Services, Montana Dept. of Military Affairs – Clarified that DES should be called the “Division of Disaster and Emergency Services” as opposed to the “Department of Emergency Services.”

Response 8: This correction has been made.

Comment 9: Tim Thennis, Recovery Bureau Chief, Division of Disaster and Emergency Services, Montana Department of Military Affairs – Sought clarification in application narrative about what could potentially be funded regarding the Laurel water intake. Application unclear about whether we are referencing the replacement of the intake with a new intake upstream or the repair of the existing intake.

Response 9: The application has been revised to clarify that Laurel has interest in using CDBG-NDR dollars to replace the existing intake with a new intake upstream.

Comment 10: Archie Harper, Valley Flood Committee – Under Phase 2 Factor 3 (Stormwater management), we have no information that indicates mine tailings are located in the Helena Valley. These hazardous materials are mostly confined to the public forests in the upper Tenmile

and Silver Creek drainages and should be addressed under the CERCLA program. The Helena NF is actively engaged with the appropriate state DEQ regarding CERCLA activities within its administrative boundaries. We are aware there exists isolated incidents where horse pastures subject to flooding resulted in entraining manure onto downstream resident properties.

Response 10: References to mine tailings in the Helena Valley have been removed.

Comment 11: Glasgow Levee Committee -- (Clarification) In 1936 the Federal Congress authorized the Glasgow Urban Flood Control Project and in 1938 the U.S. Army Corps of Engineers completed constructing an improved levee system surrounding the southern half of the City of Glasgow.

Response 11: This language has been removed.

Comment 12: Glasgow Levee Committee -- The City cannot verify with 100% certainty what exactly happened or did not happen in regards to the positioning of the Army Corps of Engineers built levee vs. the previously built levee. The end-result is that the existing levee does not appear to lie completely within the original right of way. Regardless, the Committee is hesitant to put a statement out there that cannot be documented or verified 100%. Alternative language was provided.

Response 12: This language has been removed.

Comment 13: Glasgow Levee Committee -- Glasgow's Levee is not 'Certified' per say; the U.S. Army Corps of Engineers (USACE) has represented numerous times that while the USAC does "certify" some levees that they oversee, the Glasgow Levee is not a 'Certified' levee system.

(The USACE operates multiple types of levee programs). The Glasgow Levee system was a congressionally authorized Flood Control Act approved in 1936 (House Document 88, 73rd Congress, 1st Session), as a federally authorized levee system, it is covered under the Public Law 84-99 and eligible for federal assistance as part of that program. If the levee encroachments and deficiencies are not corrected to the USACE standards, then the levee system will become listed as “inactive” in the PL 84-99 Program. An “inactive” project will not be eligible for rehabilitation assistance from the federal government. Alternative language was provided.

Response 13: This language has been removed..

Comment 14: Glasgow Levee Committee -- (Clarification) There is no elementary school located on the south side of Glasgow any more (there used to be years ago, but it has since been rebuilt on the north side (worth noting as a proactive approach to moving). Also, approximately ½ the community’s businesses located on the south side as well as the seat of County Government, all Law Enforcement Offices (City, County and Federal) and the majority of senior and assisted living facilities.

Response 14: This language has been removed.

Comment 15: Glasgow Levee Committee -- (Clarification) During times of flooding, surface run-off water from within the levee systems gets “backed up” inside of the levee, inundating limited bypass draining mechanisms. Glasgow has an underdeveloped stormwater system that struggles to disperse water from the community in times of storm events or large snowmelt.

Response 15: This language has been removed.

Comment 16: Glasgow Levee Committee -- (Clarification) Please note that the City of Glasgow has been quite active in future planning. The City adopted a Growth Policy in 2014; and in 2015 has worked with consultants to complete both a Downtown Revitalization Plan and a Community Housing Plan; which were both recently adopted by the City Council.

Response 16: This correction has been made.

Comment 17: Glasgow Levee Committee – Please consider noting the consequence of being dropped from the PL 84-99 Program by the USACE.

Response 17: This correction has been made.

Comment 18: Glasgow Levee Committee – Again, the City cannot verify with 100% certainty what and how all events transpired in regards to all the right of way acquisition. We have documentation for some areas, but it is unclear if these apply to all the right of way. Regardless, the Levee Committee is hesitant to put a statement out there that cannot be documented or verified 100%. Alternative language was provided.

Response 18: This correction has been made.

Comment 19: Glasgow Levee Committee – (Clarification) Historically a railroad town providing services to surrounding cattle and sheep ranches, the community grew exponentially with the construction of the Fort Peck Dam from 1933-1939, the largest earthen dam in the continental United States and the first of a series of dams that provide energy and flood protection to the greater Missouri River watershed from Montana to St. Louis. Combined with

the construction and activation of the Glasgow Air Force Base in 1955 through 1976, the Glasgow/Valley County area became home to approximately 20,000 people.

Response 19: This has been revised with population estimates and dates from the U.S. Census Bureau.

Topic: General

Comment 20: M. Jeff Hagener, Director, Montana Department of Fish, Wildlife and Parks – Montana Fish, Wildlife and Parks (FWP) has reviewed the list of projects proposed for the Disaster Resiliency Grant completion open for comment under the State's Phase 2 draft application for CDBG-NDR funding. We would like to state our support for all seven projects, specifically for the Fergus County, Musselshell County, and Roundup, Yellowstone County and City of Laurel and Valley County and City of Glasgow projects. We believe the four projects listed above have a high value for resiliency, environmental benefit, social benefit, and economic development. If funded these projects would be highly beneficial to both the citizens of Montana and the counties in which these projects lie.

Response 20: Thank you for your support of the application.

Comment 21: Eric Bryson, Lewis & Clark County – The Board of County Commissioners supports and endorses your application for community natural disaster resiliency funding through the Department of Housing and Urban Development. As a significantly impacted area identified by the State of Montana, our community has developed plans and implemented mitigation measures since the flood events of 2011. We have collaborated with our impacted residents, commissioned a Flood Mitigation Study, and have led negotiations with interested

groups, individual citizens, public agencies, and private entities to improve the flow of flood water throughout the Helena Valley. While our collaborative approach has raised awareness of flooding issues in our populated Helena valley area, we have all recognized that the work left to be done cannot happen without additional funding and cooperation from our partners at the State and Federal level. I reference the Helena Valley Flood Mitigation Report as an important component for both the State of Montana and any additional funding sources to refer to in consideration of funding for community resiliency. As a community, we have studied and identified mitigation measures that will lessen the impacts of regular and re-occurring floods in the Helena Valley. While we are not proposing to use the Mitigation Report as the ultimate solution to our flooding problems, it demonstrates the comprehensive way in which we have evaluated our flooding risks and identifies sound engineered mitigation measures that benefit the flood impacted area of our community. While the Commission funded the mitigation plan in total, the projects identified and implemented as a result of the plan have been accomplished with the assistance of private entities, FEMA grant funding, and County general fund allocations. If the State is successful in its application for additional funding, we stand ready to develop implementation strategies to effectively utilize any funds distributed in our area.

Response 21: Thank you for your support of the application.

Comment 22: Jim Chalmers, Friends of the Lewistown Trails – As President of the Friends of the Lewistown Trails, Inc. (FOT), I have considerable experience with the devastating effects of the 2011 floods on Fergus County. The County continues to have unmet recovery needs and there are many opportunities to improve the long term resiliency of Fergus County to lessen the impact of future disasters. Of particular interest to the Trails organization is Big Spring Creek,

both because of its incredible value as a natural resource and because of the threat it presents during flood events. One of the great achievements of FOT has been the reclamation and rechannelization of the Creek in an area south of Lewistown at Brewery Flats. Working cooperatively with FWP, DEQ and MDT, FOT has provided the catalyst that has allowed the Creek to be rechanneled to its original course and the larger, polluted industrial area to be remediated. The result is a meandering creek with a well-functioning flood plain which substantially reduces downstream flood damage as well as providing a natural area of trails and habitat that is of great value to residents, visitors and wildlife. If Montana is successful in obtaining CDGB-NDR funding, there is much that can be done along a stretch of the Creek north of town that has the same potential to benefit the region by increasing the resiliency of the downstream flood plain to serious flood events. This project is possible because of a generous easement granted by the Machler family which would allow a portion of the Creek that had been diverted into a linear channel to be rechanneled into its original meanders. Not only would this greatly increase the resiliency of the Creek to flood events, it would provide the location for trails and other recreational opportunities. I appreciate the efforts of your Department in pursuing these funding opportunities and enthusiastically support the Montana application. If I can be of any assistance in support of the Montana application, please let me know.

Response 22: Thank you for your support of the application.

Comment 23: Kathie Bailey, Snowy Mountain Development Corp. SMDC serves the six counties in central Montana including Fergus and Musselshell Counties. We have worked closely with these counties and communities through the disasters of 2011, 2012 and 2013. We've seen first-hand the devastation to the communities, businesses and infrastructure these

incidents have created. We strongly support efforts that could help the communities, counties and businesses become more resilient to the devastation. Projects that address residential and commercial acquisition/re-location; stormwater management, bank stabilization, flood control measures, trails and critical infrastructure improvements will help the communities become more resilient. The projects will prevent future damage if they are well thought out and planned with resiliency factors incorporated into the projects. The communities and our agency is excited about this opportunity that it provides for these hard hit areas to prepare for future natural disasters by incorporating resiliency factors in the project development. This program is extremely important to the efforts to make the communities, counties, and businesses more resilient and better prepared to face the challenges of future natural disaster events created by the changing global climate. We highly support your application and its efforts and hope that funders will look favorably upon this program.

Response 23: Thank you for your support of the application.