

August 21, 2024

Chris McComas  
County Planner  
Sanders County  
1111 Main Street  
PO Box 519  
Thompson Falls, MT 59873

Re: Amendment Request for Conditional Preliminary Plat for McMillan Post RV Park

Mr McComas,

Mark and Kathleen French, Developers, are formally requesting to Amend the Conditional Preliminary Plat for the proposed McMillan Post RV Park. This amendment is specific to the Fire Response Suppression Criteria incorporated in the March, 2024 Sanders County approval process.

After discussions with the Plains-Paradise Rural Fire Department, we are seeking the criteria for Fire Suppression be amended to remove fire suppression volume on-site and be replaced with the Subdivision per lot fee requirement. This is in line with the PPRFD's wishes.

In review of the McMillan Post RV Park's Subdivision application packet submitted to Sanders County in November 2023, we are able to identify only one item that needs to be amended and re-submitted in seeking this amendment: the Fire Prevention Plan. It is attached for your referral. I have also submitted a \$200 check for application expenses. It was unclear if I needed to provide any funds, but we did not want the absence of funds to delay this Amendment process.

Please let me know if you have any questions or seek any additional information as we move this process forward.

Thank you,

Kathleen C French

## Fire Prevention Plan – McMillan Post RV Park

**Proposed Development:** McMillan Post RV Park

**Owners/Contact:** Mark & Kathleen French, (c) 406.260.5918 (c) 406.360.1284

**Operators/Contact:** Mark & Kathleen French, (c) 406.260.5918 (c) 406.360.1284

**Site Address:** 2150 MT Hwy 135, Paradise, Montana

**Mailing Address:** 8682 MT Hwy 200, Plains, Montana 59859

**Size of Proposed Development:** 7 plus acres, including internal roadways, structures and RV pads

**Fire District:** McMillan Post RV Park is served by the Plains Paradise Rural Fire District

**Site Accessibility:** The RV Park is easily accessible, located at the intersection of MT Hwy 135 and MT Hwy 200. Main access to the Park is located at 2150 MT Hwy 135. Uni-135 and MT Hwy 200. Main directional traffic will flow easterly from the main entrance through the Park and exit at 8515 MT Hwy 200. Roadway grades within the RV Park are minimal to support large RV traffic. The state highways are wide, paved, and designed for large vehicles. Access and Egress points for the park were permitted, designed, built and approved by MDT for semi-trucks, buses, and recreational vehicles. Appropriate signage will be installed at each intersection within the RV Park and numerical site identification will be posted. A rural addressing map is attached.

**Current Land Use and Vegetation:** The site is currently vacant land. Existing vegetation is primarily native grasses or agricultural forage of mixed alfalfa and timothy grasses. Development of this site into recreational vehicle lots will lead to accommodating landscaping for privacy, recreation, and visitor satisfaction. Very few trees exist on the 7 acre site. A significant number of new trees will be planted as part of the site development. As a visitor recreation center, landscaping will be developed and maintained to enhance the visitor appeal of the site. There are no plans for heavy trees, over hanging foliage, or obstructions to compromise vertical clearance during fire response.

**Topography:** McMillan Post RV Park is located at the intersection of MT Hwy 135 and MT Hwy 200. Both the Upper Clark Fork River and the Flathead River are located within a quarter mile of the development. Between the development and the rivers lie rural residential properties and fields managed for agricultural use. Directly across the Upper Clark Fork River and the Flathead River are high sloped and sparsely forested mountains of the Lolo National Forest. Directly to the south of the RV Park is a steep wooded rise to a residential property. The land on which McMillan Post RV Park is proposed is relatively flat. Roadway grades within the Park are minimal to support large RV traffic. There are no riverbanks, streams, ponds or wetlands to maneuver through or around. There are no boulders or rock formations to maneuver through or around.

**Fire Suppression Storage Volume on Site:** Over 10,000 plus gallons of water is available for fire suppression during the initial 30 minute response. ~~No one~~

McMillan Post RV Park plans to meet initial fire response water volumes at the development through four specific sources: above ground tanks, well reservoir(s), water development infrastructure throughout the development, and proximity to offsite fill stations.

(1) Our Non Transient Public Water System was approved in 2005 by MDEQ and Sanders County. It is currently undergoing a Re-Review with MDEQ. It contains a 5000 gal above ground storage tank to service the development. This water is available for initial fire response.

(2) The Public Water Source (well) approved for the development (GWIC 154141) was tested at 85 gpm over a 24 hour period with no significant draw down. The well is equipped with a 1.5-hp pump, providing an additional 1000 gal for initial response over the first 30 minutes and additional volume afterwards. Additionally, The RV park owners have water rights/water access with a second well onsite (GWIC 73587) and can divert over 500 gal of water for initial fire suppression in the first 30 minutes, and additional volume thereafter.

(3) Our layout for McMillan Post RV Park provides water service for 12 of 16 sites. This means that water will be directly available with a hose connection at 12 sites. Additionally, water hose connections will be available at the Bath House, Welcome Center, Pump House, and Dump Station.

**Fire Suppression Volume Offsite:** Three offsite filling water sources providing in excess of 10,000 gpm are available. McMillan Post RV Park is located at the intersection of two major river systems. Water Tankers for the Plains Paradise Rural Fire Department can be filled in several places in close proximity to the Park development.

- a) Roaded access on private property to the Flathead River is available 300 yds from the RV development;
- b) Water fill access is available via ROW at the Claeck Fork River bridge located less than a quarter mile away on MT Hwy 200; and
- c) A fill station is available in Paradise less than 3 miles away on MT Hwy 200.

Existing power lines at the periphery of the development are overhead, coming from neighboring properties. All electrical lines within the development are to be laid underground.

**Operational Activities:** McMillan Post RV Park will be welcoming visitors from across the U.S., many visiting Montana and the region for the first time. We will alert all visitors to the fire safety issues regarding open flames and cooking. We will alert all visitors to forest fire concerns. Any campfire burning will occur within campfire rings and will be positioned away from undergrowth, trees, and RVs.

**Personnel Activities:** McMillan Post RV Park will provide (3) 10 Lb A-B-C universal fire extinguishers at the site: at the Existing Shop, Welcome Center, and Pump House. In addition, the RV Park will provide water hoses to support fire suppression activities from within the wet site zone and to support fire needs outside this zone. The location of these fire response tools, and water sources will be located on site maps and posted for site and response personnel. Site personnel will be instructed as to the location and use of the fire prevention and control tools onsite for use on small fires and to assist the Plains Paradise Rural Fire Department needs for larger fires.

**Date of Submittal:** November 20, 2023

Resubmitted: August 21, 2024



## Plains-Paradise Rural Fire District

PO Box 1115 / 20 Airport RD, Plains, MT 59859  
406-826-3900 | [www.pprfd.com](http://www.pprfd.com)

August 12, 2024

**Kathleen French,**

### **RE: McMillan Post Development MDEQ request for fire flow verification**

The Plains-Paradise Rural Fire District was provided a development overview and history from the developer on July 29th in response to our request for development information via email on July 25th. A lot layout with well site locations was also provided.

The overview outlines the use of the public water system and that fire suppression was not engineered into the system and the other wells could provide for fire flow if needed. The request from MDEQ was to verify that the proposed public water supply well GWIC#154141 did not need to supply fire flow water.

Based on the provided documentation provided by the developer, and their assurance that other water sources are available for any future fire flow needs, the public water well source does not need to provide fire flow.

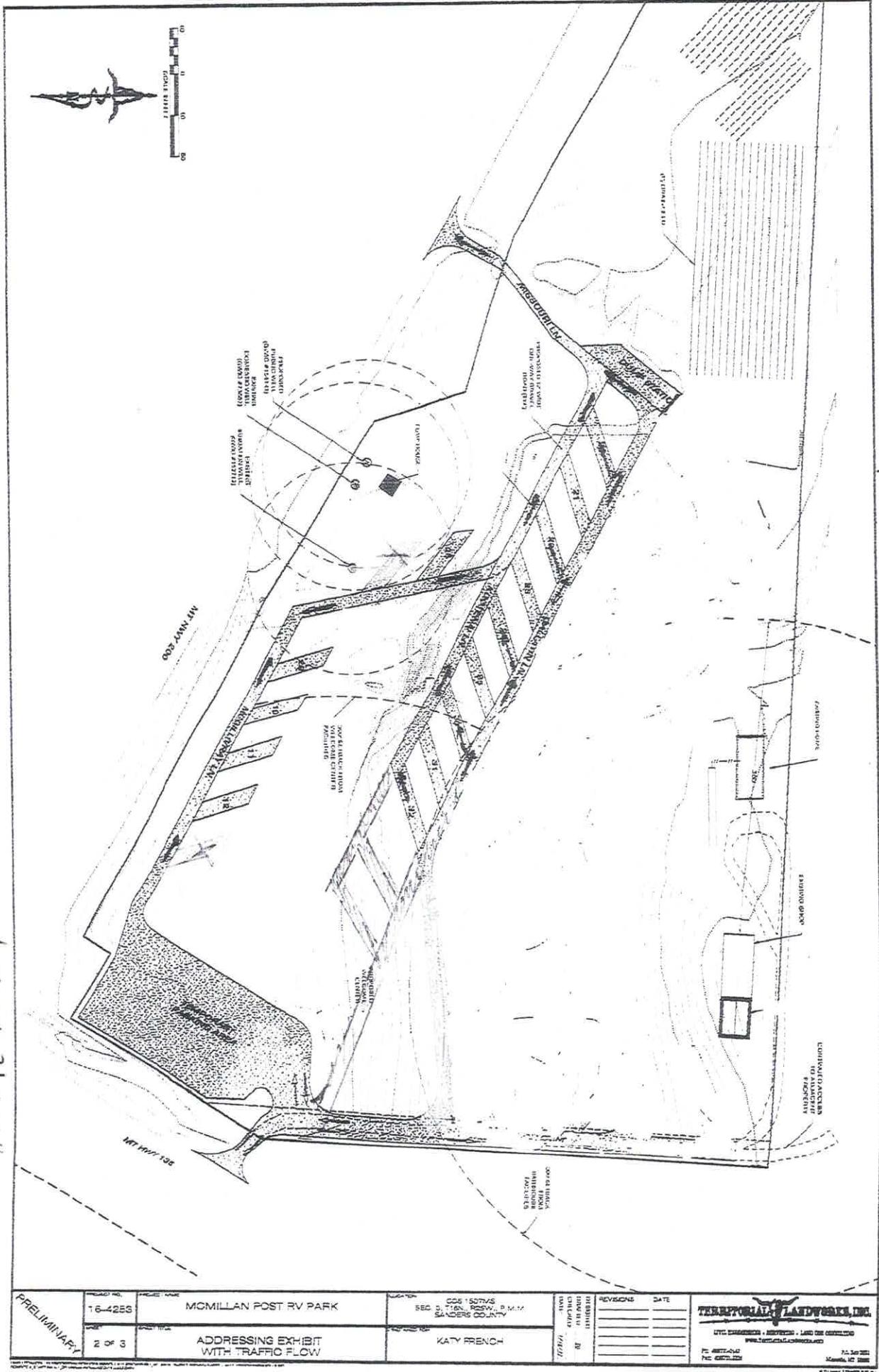
Building codes for any structures built may require specific water supply for sprinklers or fire suppression systems. If specific fire flows are required on future development, the public water supply provided by the above well can not be used.

**Clint Weedeman,**

**Board of Trustee Chairman**  
**Plains-Paradise Rural Fire District**

# McMillan Post Development & RV

August 21, 2024



September 10, 2024

Chris McComas, County Planner  
Sanders County  
1111 Main Street  
PO Box 519  
Thompson Falls, MT 59873

RE: Amendment Request for Conditional Preliminary Plat for McMillan Post RV Park/First Element Review specific to Fire Response Activities

Mr McComas,

Mark and Kathleen French, Developers, are formally requesting to Amend the Conditional Preliminary Plat for the proposed McMillan Post RV Park. This Amendment is specific to the Fire Response Suppression Criteria incorporated in the March 2024 Sanders County Preliminary Plat approved.

In your First Element Review dated August 23, 2024, you identified 4 items that you requested be updated in order to move this Amendment process forward. These include:

- (1) A revision with minor changes to the original Application Overview. This item has been revised and is attached for your consideration.
- (2) A revision with minor changes to the Survey of Probable Impacts. This item has been revised and is attached for your consideration.
- (3) Preparation and submittal of a revised Sanders County Fire Risk Rating Form. This item has been provided under two scenarios for consideration with the Plains Paradise Rural Fire Department. As you were copied on these scanned email submittals, you are aware that your request to re-identify the primary access roads as the internal roads, and not the highways, has been submitted for the Fire Chief to consider. This request seems in conflict with the former Planner's direction, but I am amenable to whatever the Fire Chief recommends through this process. As stated in the email correspondence, either "primary access" option does not raise the Fire Risk above the Low Risk Range.

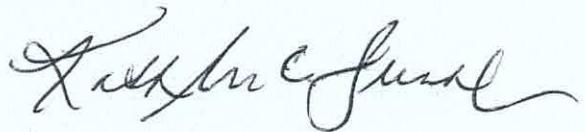
I have attached a second check reflecting the \$175 Amendment processing fee.

Finally, in regard to your final request in the First Element Review, item (4), I will remind you that I strongly object to your request for a detailed Site Plan at this time. As I stated in a phone conversation with you, these requested items ARE NOT in any way tied to the Amendment process for Fire Suppression activity. While I have communicated movement of two RV sites within the park, the alignment and configuration of these re-positioned sites do not materially change anything. You agreed that this re-positioning was a minor change and would not require an Amendment process. I believe you do not possess the authority to require this detailed site plan of us as part of the Amendment Review process that is specific to Fire Suppression activities. I reject your authority in requiring us to provide this at this time.

We request that Sanders County Planning Dept. move the Amendment process forward absent this detailed site plan.

Please let me know if you need any other items in regard to Fire Suppression activities as you move this process forward. We look forward to a proposed schedule for consideration.

Regards,

A handwritten signature in black ink, appearing to read "Kathleen C French".

Kathleen C French

cc:     Commissioner John Holland  
          Commissioner Dan Rowan  
          Commissioner Tony Cox

# **Sanders County Subdivision Preliminary Application - Overview**

## **1.0 Application Form**

A Preliminary Application Form provided during the Pre-Application Meeting has been completed and signed.

## **2.0 Review Fee**

Based on the fee schedule provided, a review fee of \$1420.00 has been provided.

## **3.0 A Preliminary Plat**

A plat map enclosed. From North to South, the road names are: McGillivray Lane and Kootenai Lane. These road names have been secured through the Sanders County Rural Addressing office. The development is over-laid on a topographic map of the parcel(s). It shows the RV site numbers for addressing purposes.

### **3.1 RV Site Lengths and Widths**

The RV site's widths are all standard at 12 ft wide. The site lengths vary throughout McMillan Post RV Park. From north to sound and moving from west to east the site lengths are as follows:

McGillivray Lane:	(4) 55 ft	
	(1) 60 ft	Total of 5 sites
Kootenai Lane	(11) 70 ft	
		Total of 11 sites

Of the 16 RV sites, 12 will provide water and electric service. Four of the sites will only provide electric service, but will be in close proximity to the bath house and drinking water sources. All of the RV sites are within a 300 ft radius of the bath house.

All of the RV sites are separated by a minimum of 22 ft.

### **3.2 Road Width**

The internal road network consists of roads built to 15 ft in width entering through the Main Entrance at 2150 MT Hwy 135. The traffic within the RV Park will be unidirectional. Travel exits at 8515 MT Hwy 200. Both the access and egress points have been designed, constructed, and paved under the authority of MDT for large/long vehicular traffic.

## **4.0 Road Profile**

Travel through the RV Park is all uni-directional with traffic flowing from west to east. New RV traffic from the parking area will travel along McGillivray Lane. From here, it will merge into Kootenai Lane.

Kootenai Lane will terminate at its most easterly point where traffic will turn onto Missouri Lane. Traveling north on Missouri Lane, RV Park traffic will exit onto MT Hwy 200. Note that RV sites on McGillivray Lane are back-out sites only (sites 10-12, 28-29).

New RV traffic (sites 20-25m 30-34) will access the RV Park through the Main Entrance at 2150 MT Hwy 135 and travel up Wilddose Lane until they reach Gallatin Lane. Traffic will continue east along Gallatin Lane. All RV sites along Gallatin Lane are 70 ft pull through sites. An RV will enter their designated site through Gallatin Lane and exit their designated site onto Kootenai Lane. Gallatin Lane continues on to the east until it terminates at Missouri Lane. Traffic on Missouri Lane travels northbound until it meets up with MT Hwy 200.

The roads are designed and will be built to the General Specifications (F-2 and F-3) provided by Sanders County. Extra and overflow parking for RVs and their boats/cars, etc is available.

## **5.0 Topographic Map/FEMA Panel Map**

A Topographic Map submitted to FEMA for the LOMR-F has been enclosed. This identifies the fill areas on the property that were raised above flood plain elevations in Fall 2019 under Flood Plain Fill Permit #2019-07. The LOMR-F Determination was received from FEMA in January 2020. The map shows the topographical features on the parcel(s) at this time.

## **6.0 Vicinity Map**

A vicinity map is enclosed indicating the location of the proposed McMillan Post RV Park development at the intersection of MT Hwy 135 and MT Hwy 200 just southeast of the confluence of the upper Clark Fork and Flathead Rivers.

## **7.0 Abstract of Title and Documentation**

Clark Fork Title has prepared documentation that includes easements, covenants, and deed restrictions.

There are no financial encumbrances on the properties.

Water rights have been secured, and there is no proposed distribution of water rights within the development. A Public Water Source (PWS) has been approved at the site to serve the development.

There is no proposed distribution of mineral rights within the development.

There are no proposed easements within the development.

This information has been submitted under separate cover by Clark Fork Title to Sanders County.

Gallatin Lane serves the RV Park, but resides either within the adjacent parcel (Parcel A), or straddles the property line of Parcel A and Parcel B. As the owners of both Parcel A and Parcel B, we are prepared to provide assurances that land committed to this roadway will be able to meet the obligations of its future service to Parcel B and the RV Park.

Current easements on the parcel(s) include overhead power lines and underground water lines. There are two current underground water line easements within the development. The development owner

enjoys ownership of the properties that those easements support. Overhead electrical easements are located out of the RV Park proper area. Electrical lines proposed within the RV Park will all be underground.

## **8.0 Environmental Assessment; Summary of Probable Impacts & Community Impact Report**

The Environmental Assessment is enclosed detailing the relation to and issues regarding the proposed McMillan Post RV Park. As indicated, the parcel(s) are not in an environmentally sensitive area. The parcels do not include ponds, river banks, or streams. We have not identified any geologic concerns. There is no vegetation of significant ecological, historical, or visual concerns.

The groundwater has been thoroughly studied for this development. Use of the groundwater and disposal of wastewater on site has been designed to ensure minimal impacts to the site in accordance with MDEQ standards. The development will not be seeking to utilize any public water or wastewater infrastructure, but will be providing their own systems onsite. No extension of capital facilities is sought.

Site specific water and wastewater facilities were designed and approved for development in 2005. They are currently undergoing re-review with MDEQ.

McMillan Post RV Park will seek to utilize the existing road network (MT Hwy 135 and MT Hwy 200), law enforcement services, emergency ambulance services, and emergency fire services. The increase in property tax assessment for the development, as presented, should offset any additional costs to the community.

McMillan Post RV Park is located in a designated Empowerment Zone. This is an “economically distressed community” due to low employment opportunities and low capital investment.

## **9.0 Fire Risk Rating Analysis/Fire Prevention Planning**

The Sanders county Fire Risk Rating Form has been submitted with this application detailing the issues and concerns in planning for fire prevention and response at the proposed development. Accompanying this Risk Form is the McMillan Post RV Park’s Fire Prevention Plan that was submitted to James Russell of the Plains/Paradise Rural Fire District. Within the plan is an identification of fire response water volumes at offsite fill stations in the vicinity to support fire suppression on-site.

## **10.0 Noxious Weed Management Planning**

A Weed Control Plan has been submitted to Rory Nygaard with the Sanders County Weed Department. It details McMillan Post RV Park’s goals and obligations for meeting weed management needs at the RV park.

## **11.0 MDT Encroachment Permits**

McMillan Post RV Park has obtained and satisfied three encroachment permits for the proposed development. Paperwork is enclosed.

## **12.0 Water and Wastewater System Approvals**

In 2005, MDEQ approved water and wastewater systems for the site, and approved a Certificate of Subdivision which allows for a store, hotel, museum, restaurant, and other activities at the site. Other activities was in reference to the RV activities that were included in the water and wastewater approvals. However, no preliminary plat was ever obtained for the parcel. Once a preliminary plat has been approved, MDEQ can move forward to grant final approval for the RV activities at the site. The water and wastewater systems are currently undergoing a re-review with MDEQ. Final approvals are expected in the Fall of 2023. A meeting was held with the MDEQ team (including Commissioner Dorrington), our IMEG contractors, and Representative Loge on Oct 17, 2023. We have been assured that final approval for water and wastewater systems is near term. Preliminary plat approval for the RV park was obtained from Sanders County in March 2024.

### **13.0 Notification of Proposed Subdivision**

During the Pre-Application meeting with Sanders County, it was determined that we should send letters to the school and fore district. Those notifications have been made.

### **14.0 Recreation Opportunities**

Besides being located near two river systems, McMillan Post RV Park is also located near Quinn's Hot Springs Resort and the Paradise Center. Internally, the RV park will provide up to a ½ mile walking trail loop, frisbee golf, and an enclosed dog park.

### **15.0 Aesthetic Issues**

It is important that McMillan Post RV Park provide curbside appeal for visitor traffic in the area. It is located at a highly visible intersection. There will be a significant amount of planting of shade trees and privacy trees. These planting will occur along the property boundaries to minimize noise, and between the RV sites to maximize privacy. Planting of trees and tall ornamental plants will also be strategically placed to limit noise and light pollution of activities to neighboring properties.

The sites will provide lighting at each address post, with lighting directed downward to aid in location, but to minimize light pollution.

Garbage will be collected and removed offsite of the RV Park on a daily basis, at a minimum.

A quiet time will be posted and enforced for activities after 9pm and prior to 8 am.

### **16.0 Environmental Issues**

McMillan Post RV Park will be utilizing environmentally clean technology where possible. We are designing the facility with solar power and geothermal applications to offset offsite power needs. We are working to secure EV chargers for the site.

## ENVIRONMENTAL ASSESSMENT

Describe the following environmental features, provide responses to each of the following questions and provide reference materials as required.

### 1. Surface Water

Locate on a plat overlay or sketch map:

- a. Any natural water systems such as streams, rivers, intermittent streams, lakes or marshes (also indicate the names and sizes of each). - NA
- b. Any artificial water systems such as canals, ditches, aqueducts, reservoirs, and irrigation systems (also indicate the names, sizes and present uses of each). - NA
- c. Time when water is present (seasonally or all year). - NA
- d. Any areas subject to flood hazard, or in delineated 100 year floodplain. - *A property map is included that indicates the area delineated as part of the 100 year flood plain along the northern property line (Hwy 200) of COSA 1507, Parcel B. The majority of original floodplain delineated area 300 feet east of the intersection was filled (Floodplain Fill Permit # 2019-07) in the Fall of 2019. A LOMR - F for both Parcel B and the DOT ROW lands was recorded and recognized by FEMA on January 30, 2020. One Hundred year floodplain area from the 0 to 300 ft of the parcel (the west end) along Hwy 200 was filled during construction of the proposed parking area (under Floodplain Fill Permit #2019-07) in June 2021.*
- e. Describe any existing or proposed streambank alteration from any proposed construction or modification of lake beds or stream channels. Provide information on location, extent, type and purpose of alteration, and permits applied for. - NA

*There are no natural water systems such as streams, rivers, intermittent streams, lakes or marshes on the property. There are no artificial water systems such as canals, ditches, aqueducts, reservoirs, or irrigation systems on the property. There are no existing or proposed streambank alterations from any proposed construction or modification of lake beds or stream channels that involve this property.*

### 2. Groundwater

Using available data, provide the following information:

- a. The minimum depth to water table and identify dates when depths were determined. What is the location and depth of all aquifers which may be affected by the proposed subdivision? Describe the location of known aquifer recharge areas which may be affected.

*The original Subdivision review and approval of the Transient Non-Community Public Water Supply System and the Public Subsurface Sewage Disposal System*

designed for this site was accompanied by an Aquifer Test Results of the Mandich/French Well, Confluence of Flathead and Clark Fork Rivers, Newman, Howard, Missoula, Mt. (2004).

*There are three wells drilled and available for use in this development. In 2005, the Stephens/Mandich well was tested and approved as a public water source by MDEQ for this development. The total depth of the well is 42.0 ft (47.0 ft after fill placement) and the static water level is 10.0 ft. (15.0 ft after fill placement) according to the well log (Krass, 1995).*

*The direction of groundwater flow on the property is to the southeast from the Clark Fork River just above its confluence with the Flathead River towards an area of backwater sloughs on the southside of the Flathead River (pg.7) It was found that the wells derive their water from Quaternary alluvial sand and gravel deposits. The report confirmed that the aquifer supplying this well was strongly unconfined and capable of sustaining pumping rates far in excess of the 8 inch well's capacity to withdraw water. Since MDEQ is in the process of re-reviewing the water and sanitation plans for this project, the MDEQ application documentation has not been included in this packet. MDEQ's approval should suffice as adequate evidence that this project is not significantly impacting the aquifer so additional information regarding the aquifer has not been provided.*

- b. Describe any steps necessary to avoid depletion or degradation of groundwater recharge areas.

*Per the Aquifer Test Results of the Mandich/French Well, Confluence of Flathead and Clark Fork Rivers, Newman, Howard, Missoula, Mt. (2004) report, "Tests confirmed that the aquifer was capable of sustaining pumping rates far in excess of the 6" well's capacity to draw water..."*

*A water right will be obtained for the designed Transient Non-Community Public Water Supply system that will serve this development. Sanitary approval is being sought by MDEQ through the re-review process for the proposed subsurface sewage disposal system. It was originally approved in 2005. The water right and sanitary review processes ensure that the necessary measures have been taken to avoid depletion or degradation of groundwater recharge areas.*

*We will be pumping at no greater than 35 gallons per minute. The water system has been designed for a 5000 gal reservoir tank to serve the development during high demand periods.*

## **SUMMARY OF PROBABLE IMPACTS**

Summarize the effects of the proposed subdivision on each topic below. Provide responses to the following questions and provide reference materials as required:

## 1. Effects on Agriculture

*The property presented for recreational development and a small store is not currently used for production of timber land, and minimum production of agricultural commodities. As a seven acre parcel, roughly four acres have traditionally been utilized for forage/hay production. Upon completion of the proposed development, three acres will continue to be utilized for hay production.*

*The subject property has Elkrock gravelly ashy silt loam soils. This type of soil is not listed as "prime" or "farmland of statewide importance". The property is surrounded by rural residential properties with limited agricultural activities. The surrounding properties have Grantsdale silt loam and Selon fine sandy loam soil types. These soil types are defined as "prime if irrigated" by the USDA.*

*To the north, beyond the Highway 200 buffer, there is a residential/ small organic farming operation and commercial orchard. To the west, residential properties have traditionally been used for hay production and grazing. To the east, residential properties have traditionally been used for dry land hay production. To the south, the residential property has been used for grazing.*

*No possible nuisance problems which may arise from locating a recreational development near agricultural lands are known. No negative impacts to the value of nearby agricultural lands are known or expected.*

- a. Is the proposed subdivision or associated improvements located on or near prime farmland or farmland of statewide importance as defined by the Natural Resource Conservation Service? If so, identify each area on a copy of the preliminary plat.

*The subject property has Elkrock gravelly ashy silt loam soils. This type of soil is not listed as "prime" or "farmland of statewide importance". The property is surrounded by residential lots and vacant lots. The surrounding properties have Grantsdale silt loam and Selon fine sandy loam soil types. These soil types are defined as "prime if irrigated" by the USDA. The prime if irrigated soil is located on the eastern half of COSA 1507, Parcel B and will continue to be utilized for agricultural development.*

- b. Describe whether the subdivision would remove from production any agricultural or timber land.

*This recreational development will remove approximately 2 acres of land from production of agricultural commodities.*

- c. Describe possible conflicts with nearby agricultural operations (e.g., residential development creating problems for moving livestock, operating farm machinery, maintaining water supplies, controlling weeds or applying pesticides; agricultural operations suffering from vandalism, uncontrolled pets or damaged fences).

*There are no expected agricultural conflicts. Livestock is trailered to the two residential properties to the south and west. No pesticides, herbicides are fungicides are applied in the area to support the small organic farming operation and commercial orchard to the north. Grounds on the recreational development*

*will be regularly maintained to manage and eliminate noxious weeds in the developed area. Water supplies for irrigation and livestock watering have been tested and will not be negatively impacted according to the Aquifer Test Results of the Mandich/French Well, Confluence of Flathead and Clark Fork Rivers, Newman, Howard, Missoula, Mt. (2004) report submitted to MDEQ in 2005.*

*Due to the seasonal and short stay of visitors to the recreational development, no uncontrolled pets or vandalism of neighboring properties is expected. Due to the location of the small store, no uncontrolled pets or vandalism of neighboring properties is expected.*

- d. Describe possible nuisance problems which may arise from locating a subdivision near agricultural or timber lands.

*No possible nuisance problems which may arise from locating a recreational development near agricultural or timber lands are known. Please note that the subdivision for the museum, store, and hotel and other activities was approved by MDEQ in 2005. Subdivision approval for a plat of Rv spaces is being sought at this time.*

- e. Describe effects the subdivision would have on the value of nearby agricultural lands.

*No impacts to the value of nearby agricultural lands are known.*

## 2. Effects on Agricultural Water User Facilities

*Neighboring properties to the north irrigate with shallow groundwater wells from the adjacent river. In Newman's report, Aquifer Test Results of the Mandich/French Well, Confluence of Flathead and Clark Fork Rivers, Newman, Howard, Missoula, Mt. (2004), neighboring wells were tested and water usage for the recreational development was shown to have no negative impact on the agricultural properties. There are no known possible nuisance problems which the recreational development would generate with regard to agricultural water user facilities.*

- a. Describe conflicts the subdivision would create with agricultural water user facilities (e.g. residential development creating problems for operating and maintaining irrigation systems) and whether agricultural water user facilities would be more subject to vandalism or damage because of the subdivision.

*There are no known conflicts that this recreational development would create to agricultural water user's private facilities.*

- b. Describe possible nuisance problems which the subdivision would generate with regard to agricultural water user facilities (e.g. safety hazards to residents or water problems from irrigation ditches, head gates, siphons, sprinkler systems, or other agricultural water user facilities).

*There are no known possible nuisance problems which the recreational development would generate with regard to agricultural water user facilities.*

### 3. Effects on Local Services

*The needs of the proposed store and recreational development can be met by the existing services. Those services will be provided additional tax dollars based on the increased value of the parcel at the time of full development, which will help offset any increased impacts to those services. There are no known off-site costs or costs to other jurisdictions that may be incurred. There are no special improvement districts that will be created which would obligate local government fiscally or administratively.*

*The developer of this site has sought re-review for the installation of a Transient Non-Community Public Water Supply System (approved in 2005), Public Subsurface Sewage Disposal System (approved in 2005), private roads, and other utilities (Electrical) for this subdivision.*

- a. Indicate the proposed use and number of lots or spaces in each:  
 Residential, single family  
 Residential, multiple family  
 Types of multiple family structures and number of each (eg duplex, 4-plex)  
 Planned unit development (No. of units)  
 Condominium  
 Mobile Home Park  
 16 Recreational Vehicle Park  
 Commercial or Industrial  
 Other (Please describe: hotel rooms)
- b. Describe the additional or expanded public services and facilities that would be demanded of local government or special districts to serve the subdivision.
  - I. Describe additional costs which would result for services such as roads, bridges, law enforcement, parks and recreation, fire protection, water, sewer and solid waste systems, schools or busing, (including additional personnel, construction, and maintenance costs).
  - II. Who would bear these costs (e.g. all taxpayers within the jurisdiction, people within special taxing districts, or users of a service)?  
*The needs of the proposed recreational development can be met by the existing services. Those services will be provided additional tax dollars based on the increased value of the parcel at the time of full development, which will help offset any increased impacts to those services. The Volunteer Fire District in the area will benefit from additional tax dollars.*
  - III. Can the service providers meet the additional costs given legal or other constraints (e.g. statutory ceilings on mill levies or bonded indebtedness)?  
*The developer of this site has sought approvals and installation of the Transient Non-Community Public Water Supply system, Public Subsurface Sewage Disposal System, private roads, and other utilities for this subdivision. The public will experience no tax burden on this store and recreational development, but rather benefit from it.*

*Those service providers (ie, sheriff's office, solid wastes, volunteer fire department, etc.) will be provided additional tax dollars based on the increased value of the parcel and the increase in refuse fees at the time of full development, which will help offset any increased impacts to those services.*

IV. Describe off-site costs or costs to other jurisdictions may be incurred (e.g. development of water sources or construction of a sewage treatment plant; costs borne by a nearby municipality). -

*There are no known off-site costs or costs to other jurisdictions that may be incurred.*

c. Describe how the subdivision allows existing services, through expanded use, to operate more efficiently, or makes the installation or improvement of services feasible (e.g. allow installation of a central water system, or upgrading a country road). -

*This subdivision does not allow existing services, through expanded use, to operate more efficiently, or make the installation or improvement of services feasible. This recreational development will not impact existing services to any significant degree since services utilized by site visitors will be on systems wholly built and paid for by the property developer within the development.*

*There are not any commercial properties for over 20 miles (to the east) that provide a restroom for the traveling public. It is hoped this public restroom will offset some of the "dumping" that occurs in the pullouts and forest roads in the area. Similarly, there are no facilities within 20 miles to the south or east that offer shower facilities to the public (yet dozens of USFS primitive camping sites).*

d. What are the present tax revenues received from the unsubdivided land?

- I. By the County \$ Approximately \$500 in taxes were paid to Sanders County annually when the property was developed for residential use only.
- II. By the school(s) A portion of the \$500 in taxes were allotted to the school district.

*III. Please note that the subdivision designation sought does not subdivide the land.*

e. Provide the approximate revenues received by each above taxing authority if the lots are reclassified, and when the lots are all improved and built upon. Describe any other taxes that would be paid by the subdivision and into what funds (e.g. personal property taxes on mobile/manufactured homes are paid into the County general fund).

*As recreational development, individual spaces will not be available for building improvements. However, as indicated by Nicole Scribner, County Treasurer, in coordination with the Montana Department of Revenue, each new RV site will have an appraised value between \$6-\$11,000 with the appraisal of the land at \$100K for an RV development with full services. Appraised value will increase from \$100K to approx \$400K at full development. Refuse fees are administratively assigned per developed site. Additionally, bed taxes will be collected at 8% per night stay: 4% collected as a lodging facility sales tax and 4% collected as a lodging facility*

*use tax. The lodging facility sales tax goes to the state general fund, and the lodging facility use tax is deposited into several state special revenue funds, the largest of which is used by the MT Dept of Commerce for tourism promotion. Some of these funds will return to the area through Glacier Country Tourism, Sanders County's officially recognized destination marketing and management organization.*

f. Would new taxes generated from the subdivision cover additional public costs?

*Additional tax dollars based on the increased value of the parcel at the time of full development will be generated to offset public costs. However, note that the recreational development will be providing all of its own utilities (water, wastewater, electricity, private roads, etc.) and is expected to only utilize a minimal increase in services in policing and refuse collection (which is fee based).*

g. How many special improvement districts would be created which would obligate local government fiscally or administratively? Are any bonding plans proposed which would affect the local government's bonded indebtedness?

*There are no special improvement districts that will be created which would obligate local government fiscally or administratively.*

a. How would the subdivision affect surface and groundwater, soils, slopes, vegetation, historical or archaeological features within the subdivision or on adjacent land? Describe plans to protect these sites.

*There are no known impacts that this subdivision will create that would affect surface and groundwater, soils, slopes, vegetation, historical or archaeological features within the subdivision or on adjacent land.*

I. Would any stream banks or lake shorelines be altered, streams rechanneled or any surface water contaminated from sewage treatment systems, run-off carrying sedimentation, or concentration of pesticides or fertilizers?

*This project does not involve any stream banks or lake shorelines to be altered, streams rechanneled or any surface water contaminated from sewage treatment systems, run-off carrying sedimentation, or concentration of pesticides or fertilizers. No sewage treatment systems are present and active on the property post development except those approved by MDEQ as part of the re-review process.*

II. Would groundwater supplies likely be contaminated or depleted as a result of the subdivision?

*The MDEQ approved the Grading and Drainage plans for this project in 2005. Grading and Drainage plans require mitigation of possible runoff contaminates. Aquifer Test Results of the Mandich/French Well, Confluence of Flathead and Clark Fork Rivers, Newman, Howard, Missoula, Mt. (2004) reports that public groundwater source, "is more than capable of providing enough water to meet all expected demands of ... the future development proposed..."*

*Additional “Cut and Fill” was performed in 2019 to remedy flood plain concerns through the application of a FloodPlain permit. Sanders County, MDEQ, and MDT were heavily involved in this permit approval. A LOMR for the fill activity was recorded in 2020.*

III. Would construction of roads or building sites require cuts and fills on steep slopes or cause erosion on unstable, erodible soils? Would soils be contaminated by sewage treatment systems?

*The MDEQ is undergoing a re-review of the Public Subsurface Sewage Disposal System designed for this development. It was originally approved in 2005. The MDEQ review process included a Non-Degradation Analysis which determined the possible magnitude of contaminates created by the possible pollutants created by the installation of the sewage disposal system. The issuance of the MDEQ sanitation approval is evidence that this proposed subdivision will not contaminate soil by the sewage treatment systems.*

*A Stormwater Pollution Prevention Permit and Plan for construction activities is in place to alleviate and mitigate any concerns during the construction phase of this development.*

IV. Describe the impacts that removal of vegetation would have on soil erosion, bank, or shoreline instability.

*There are no water features onsite so there are no possible impacts that would be created by the removal of vegetation near banks or shoreline. Due to the relatively level grade of the site, soil erosion concerns are unlikely. In an effort to make the recreational visitor site more appealing and control possible future runoff, there will be a focus on revegetation in construction zones.*

V. Would the value of significant historical, visual, or open space features be reduced or eliminated?

*There are no known significant historical, visual, or open space features that will be reduced or eliminated.*

VI. Describe possible natural hazards the subdivision could be subject to (e.g., natural hazards such as flooding, rock, snow or landslides, high winds, severe wildfires, or difficulties such as shallow bedrock, high water table, unstable or expansive soils, or excessive slopes).

*There are no known natural hazards such as flooding, rock, snow or landslides, high winds, severe wildfires, or difficulties such as shallow bedrock, high water table, unstable or expansive soils, or excessive slopes that are associated with this property.*

b. How would the subdivision affect visual features within the subdivision or on adjacent land? Describe efforts to visually blend the proposed development with the existing

environment (e.g. use of appropriate building materials, colors, road design, underground utilities, and revegetation of earthworks).

*There are no known visual features within the recreational development or on adjacent land that will be impacted. Fencing and building materials will be in line with western building materials, i.e., wood, manufactured wood product, or siding appropriate for climate. Electrical utilities on the site will be largely underground. Choice of trees and other vegetation will be similar to species native or present in the area.*

## 5. Effects on Wildlife and Wildlife Habitat

*Whitetail deer and other smaller wildlife indigenous to this area utilize this site. There are no known endangered species or endangered species habitat on this site. The existing wildlife that utilize the site will likely continue to utilize the site. Constructing recreational sites will not significantly reduce the amount of available land for wildlife to the use.*

- a. Describe what impacts the subdivision or associated improvements would have on wildlife areas such as big game wintering range, migration routes, nesting areas, wetlands, or important habitat for rare or endangered species.

*Located at the intersection of two state highways, Whitetail deer and other smaller wildlife indigenous to this area utilize this site, but in small numbers. There are no known endangered species or endangered species habitat on this site. There are no burrows, wintering ranges, migration routes, nesting areas, or wetlands on this site.*

- b. Describe the effect that pets or human activity would have on wildlife.

*The existing wildlife that utilize the site will likely continue to utilize the site. Constructing a store and recreational sites will not significantly reduce the amount of available land for wildlife to use.*

## 6. Effects on the Public Health and Safety

*There are no known health or safety hazards on or near the subdivision, such as: natural hazards, lack of water, drainage problems, heavy traffic, dilapidated structures, high pressure gas lines, high voltage power lines, or irrigation ditches. There are no known public health or safety hazards, such as dangerous traffic, fire conditions, or contamination of water supplies which would be created by the recreational development.*

*The development property is adjacent to two state highways, and situated at the apex of a controlled access intersection. The development has been fenced to delineate property lines and encourage visitor activity away from the right -of-way.*

- a. Describe any health or safety hazards on or near the subdivision, such as: natural hazards, lack of water, drainage problems, heavy traffic, dilapidated structures, high

pressure gas lines, high voltage power lines, or irrigation ditches. These conditions, proposed or existing should be accurately described with their origin and location identified on a copy of the preliminary plat.

*There are no known health or safety hazards on or near the subdivision, such as: natural hazards, lack of water, drainage problems, heavy traffic, dilapidated structures, high pressure gas lines, high voltage power lines, or irrigation ditches. The development property is adjacent to two state highways, and situated at the apex of a controlled access intersection. The development has been fenced to delineate property lines and encourage visitor activity away from the right-of-way. While the development occurs adjacent to a control access intersection, the traffic count numbers are not considered "heavy traffic."*

b. Describe how the subdivision would be subject to hazardous conditions due to high voltage lines, airports, highways, railroads, dilapidated structures, high pressure gas lines, irrigation ditches, and adjacent industrial or mining uses.

*The development property is adjacent to two state highways, and situated at the apex of a controlled access intersection. The development has been fenced to delineate property lines and encourage visitor activity away from the right-of-way. While adjacent to a control access intersection, the traffic count numbers are not considered "heavy traffic." If Interstate 90 were to close due to traffic accidents (blocking one or both directions) or weather related hazards, this intersection would see significantly more thru traffic moving from the I-90 bypass at Missoula to Coeur D'Alene via Sandpoint, Idaho.*

c. Describe land uses adjacent to the subdivision and how the subdivision will affect the adjacent land uses. Identify existing uses such as feed lots, processing plants, airports or industrial firms which could be subject to lawsuits or complaints from residents of the subdivision.

*There are rural residential lots surrounding this site. To the north is MT Hwy 200 and further, a rural residence, small organic farming operation, and commercial orchard. To the east is a rural residence. To the south are 2 rural residences. To the west is MT Hwy 135 and further, a rural residence with large pasture.*

*The store and recreational sites and public access areas of the development are situated over 500 ft from the rural residences to the east, and in excess of 1000 ft from rural residences in other directions. The rural residences (structures) are actually located closer to each other than they are to the recreational visitor sites.*

*The proposed recreational development is fenced on three sides to discourage visitor traffic onto adjacent private properties.*

d. Describe public health or safety hazards, such as dangerous traffic, fire conditions, or contamination of water supplies which would be created by the subdivision.

*There are no known public health or safety hazards, such as dangerous traffic, fire conditions, or contamination of water supplies which would be created by the subdivision.*

## PART V COMMUNITY IMPACT REPORT

Provide a community impact report containing a statement of estimated number of people coming into the area as a result of the subdivision, anticipated needs of the proposed subdivision for public facilities and services, the increased capital and operating cost to each affected unit of local government. Provide responses to each of the following questions and provide reference materials as required.

*This development will create 16 seasonal recreational visitor sites. The average number of people intermittently residing at each visitor site will be approximately 2.0 individuals. Two hundred persons per day are expected to enter the store. Once the project is at complete “built-out”, the approximate number of visitors in the recreational development will range from 0-250 on any given day. The bulk of the visitor activity will occur during the prime tourist season of late summer and early fall. Each pair of recreational site visitors is assumed to create approximately 2 vehicle trips per day. The store activity visitors are not expected to dramatically increase vehicle traffic. These visitors are largely existing visitor traffic that have stopped in.*

*Adding this seasonal and intermittent population and their associated vehicles trips to the rural Paradise area will not require the extension of public facilities or services nor will it significantly increase the capital and operating cost to the local government. It is assumed that the infrastructure that is proposed for the store and recreational development in combination with the existing public infrastructure will be sufficient for the addition of intermittent seasonal visitors of this proposed development.*

- a. Describe the capability of existing and proposed roads to safely accommodate this increased traffic.

*The existing roadways in the areas of expected use by the recreational development's visitors are paved state highways. They have been built to safely accommodate increased traffic at this level. The access and egress points on both MT Hwy 135 and MT Hwy 200 to COSA 1507, Parcel B, were designated and permitted by Montana Dept of Transportation to accommodate heavy traffic. They were constructed to accommodate long vehicle lengths for RVs, buses, and semi-trucks. These access/egresses were completed and approved by MDT in Oct 2021.*

*RV traffic already utilizes this intersection of MT Hwy 135 and MT Hwy 200 enroute to Glacier Country and Flathead Lake. The goal of this development is to catch this “thru traffic” in Sanders County and encourage their stay to enjoy existing attractions in the area. These include the area hot springs, Paradise Center, SC Fairgrounds, recreational events, and seasonal activities.*

- b. Describe increased maintenance problems and increased cost due to this increase in volume.

*There will be some additional maintenance required due to the additional traffic on the public roadways. This increased traffic volume and maintenance will be partially offset by the increased property tax base created by the division of the original parcel into recreational visitor sites. Internal roadways will be maintained by the development owners.*

*MDT, through their permitting and approval process, is aware of the activities presented here and has identified access/egress requirements as part of their formal permitting process. This process was completed in Oct 2021.*

- c. Describe proposed new public or private access roads including:
  - i. Measures for disposing of storm run-off from streets and roads.
  - ii. Type of road surface and provisions to be made for dust.
  - iii. Facilities for streams or drainage crossing (e.g. culverts, bridges).
  - iv. Seeding of disturbed areas.

*The development of this site requires the construction of internal and external private roads for access to the recreational visitor spaces. The store and recreational development will be accessed from internal roadways. The development is located adjacent to two state highways: MT Highway 135 to the west and MT Highway 200 to the north.*

*Roads within and adjacent to the recreational development will be single lane single directional roads of 12 foot width with a 1 ft shoulder on each side. They will be sloped to allow for stormwater runoff and collection in a northerly direction away from the well zones. The ground is highly permeable and little to no runoff is expected to pool. The road bed and shoulder will be localized rock and gravel. Dust suppression will be addressed with irrigation activities, if warranted. No natural water systems (lakes, creeks, rivers, drainages, etc) exist on the site, so no culverts or bridges are warranted.*

*As part of our Stormwater Pollution Prevention Plan (SWPPP) (confirmation #MTR108112), the site will be reseeded as a BMP to best identify and address any runoff contamination that may potentially occur from unseeded areas during and post construction.*

- d. Estimate the cost and completion date of the system, and indicate who will pay the cost of installation, maintenance and snow removal.

*The internal roadways and recreational sites are a key part of the development. The future construction and maintenance of the internal roadways will be the responsibility of the property owner(s). Development of the internal roadways will occur once final permits for utilities are obtained and funding is secured. Costs are associated with the construction of road beds, parking facilities, and recreational visitor sites. It includes the relocation of several thousand cubic yards of onsite gravel to support the road beds, sites, parking, and drainfield (for the wastewater system).*

### **3. Water, Sewage, and Solid Waste Facilities**

- a. Briefly describe the water supply and sewage treatment systems to be used in serving the proposed subdivision (e.g. methods, capacities, locations).

*A Transient Non-Community Public Water System was designed by Territorial Landworks, Inc. and approved for the site by MDEQ in 2005. It is currently undergoing a re-review with MDEQ. Final approval is targeted for Fall 2023. The water system will be served by an approved public well located on the property. The proposed water system includes a 5000 gal underground tank that will be a supply source for the recreational development. It will have a disinfection system. The water system includes a distribution system to facility structures and sites.*

*A Public Subsurface Sewage Disposal System was designed by Territorial Landworks, Inc. and approved for the site in 2005. It is currently undergoing a re-review with MDEQ. Final approval is targeted for Fall 2023. The public sewer system will consist of multiple commercial sewer connections that collect wastewater from the facility structures and sites. The mixing tank will be connected to a dosing tank where the effluent will be pumped into a pressurized subsurface disposal site (drainfield) that will be separated into 12 hydraulically equivalent zones. RV waste will not be collected and disbursed through the Subsurface Sewer Disposal System.*

*A separate and independent dump station will be located onsite. It will be pumped and served by M&MT Enterprises of Hot Springs, Mt. on an as needed basis.*

- b. Provide information on estimated cost of the system, who will bear the costs, and how the system will be financed.

*The developer has paid for the design and permitting of the designed systems. The developer intends to construct the system(s). The developer is securing funding for the overall development through conventional financing; these systems are an integral part of the development. The developer will bear the costs of the system. The combined costs of the Water and Wastewater Systems is estimated at \$280K.*

- c. Where hook-up to an existing system is proposed, describe estimated impacts on the existing system, and show evidence that permission has been granted to hook up to the existing system.

*The system(s) will be separate and independent of any offsite private or municipal systems.*

- d. All water supply and sewage treatment plans and specifications will be reviewed and approved by the Department of Environmental Quality (DEQ) and should be submitted using the appropriate DEQ application form.

*Final application materials for the re-review for both systems has been provided to MDEQ for a targeted approval in Fall 2023.*

- e. Describe the proposed method of collecting and disposing of solid waste from the development.

*The RV development have a solid waste disposal area identified onsite. Wastes will be collected and disposed of at the public Sanders County Solid Waste*

*Collection and Transfer Facility in Plains by the property owner(s) or through contract services by a commercial solid waste collection company.*

f. If use of an existing collection system or disposal facility is proposed indicate the name and location of the facility.

*The RV Development will be utilizing the Sanders County Solid Waste Transfer and Collection Facility in Plains located at 122 Old Hicks Road for site solid waste disposal.*

## **5. Payment for extension of Capital Facilities**

Indicate how the subdivider will pay for the cost of extending capital facilities resulting from expected impacts directly attributable to the subdivision.

MARK FRENCH  
KATHLEEN FRENCH  
8682 HWY. 200 E.  
PLAINS, MT 59859

5005

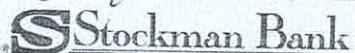
93-524929  
00063

Date

Sept 19, 2024 \$175.00

 CHECK ARMOR  
ANTI-FRAUD PROTECTION

Pay to the  
Order of Sander County Treasurer \$175.00  
One hundred Seventy five and 00/100 Dollars

 Stockman Bank

1-877-300-9369 (Customer Service)  
1-888-669-0724 (Telebank)  
[www.stockmanbank.com](http://www.stockmanbank.com)

For Planning Assistance Fee

100929092491910034826910 05005

 Photo  
Safe  
Deposit  
Details on back

Subject **Fw: Fire risk rating forms**  
From Kathleen French <esa\_french@yahoo.com>  
To Printery <printery@plainsmt.net>  
Date 2024-10-21 12:01 pm



Please print. Thanks

----- Forwarded Message -----

**From:** Chris McComas <cmccomas@sanderscounty.gov>  
**To:** PPRFD Chief <pprfdchief@gmail.com>  
**Cc:** Kathleen C French <esa\_french@yahoo.com>  
**Sent:** Thursday, October 17, 2024 at 09:55:37 AM MDT  
**Subject:** RE: Fire risk rating forms

James,

Thank you for your response. No formal letter is required but is welcome if you or the board so choose.

## Chris McComas

Director of Land Services

Sanders County

PO Box 519

Thompson Falls, MT 59873-0519

406-827-6965(Office)

406-499-6573(Cell)

Email: [cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)

<https://co.sanders.mt.us/206/Land-Services>



**From:** PPRFD Chief <pprfdchief@gmail.com>  
**Sent:** Thursday, October 17, 2024 9:44 AM  
**To:** Chris McComas <cmccomas@sanderscounty.gov>  
**Cc:** Kathleen C French <esa\_french@yahoo.com>  
**Subject:** Re: Fire risk rating forms

Chris,

I do not have any other further input from my board. They recommended the \$500 lot fee in lieu of a water supply at the August board meeting. If there is further documentation of that, a formal letter of recommendation can be supplied.

I believe the subdivision regulations would still require the fire prevention and response plans. This is the outline of those plans we previously provided:

### 1. Fire Prevention Plan

a. **Campfire Prevention:** Fire pit locations need to be a reasonable distance from RV parking spaces with consideration of high winds. Fire pits must have a 48" buffer zone from any grass, permanent furniture, or any other combustible materials.

Communication plan for informing and enforcing campfire restrictions when implemented by Sanders County during high wildfire risk periods.

- b. **Fuel mitigation:** Keeping grass cut in areas that are subject to possible ignition sources.
- c. **Smoking:** Designated smoking areas with proper disposal receptacles for lit smoking materials.

## 2. Fire Response Plan

- 1. **Written emergency notification plan**
- 2. **Written evacuation plan**
- 3. **Detailed plat map of site including the following elements:**

1. Entrances, exits, emergency egress/ingress routes
2. Road widths, grade, corner turn radius
3. Water supply location
4. Water system layout
5. Fire extinguisher locations
6. Electrical shut off locations
7. Propane storage and shut off locations
8. Chemical storage locations

Send me a copy of the PDF application when it is available. I am out of state right now, but let me know if you need anything else.

James Russell

On Wed, Oct 16, 2024, 17:50 Chris McComas <[cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)> wrote:

James,

Do you have additional comments related to the proposal by Katy to not supply the fire-fighting water source on-site for McMillan Post RV Park. I am currently reviewing the application for amending the Conditional Preliminary Approval for McMillan Post RV Park related to not providing a fire-fighting water source.

We have had correspondence related to this proposal that indicated support by the fire department for the developer to pay \$500 per RV site in lieu of providing a fire-fighting water source on-site. I do not currently have a PDF application that I can provide to you. However, it can be sent to you in the coming days if you would like to review it.

Your comments are welcome and will be provided to the Sanders County Commissioners for their consideration.

## Chris McComas

Director of Land Services

Sanders County

PO Box 519

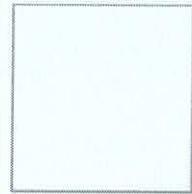
Thompson Falls, MT 59873-0519

406-827-6965(Office)

406-499-6573(Cell)

Email: [cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)

<https://co.sanders.mt.us/206/Land-Services>



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**From:** Chris McComas  
**Sent:** Friday, September 13, 2024 10:36 AM  
**To:** PPRFD Chief <[pprfdchief@gmail.com](mailto:pprfdchief@gmail.com)>  
**Subject:** RE: Fire risk rating forms

James,

Thank you for dropping that off.

## Chris McComas

Director of Land Services

Sanders County

PO Box 519

Thompson Falls, MT 59873-0519

406-827-6965(Office)

406-499-6573(Cell)

Email: [cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)

<https://co.sanders.mt.us/206/Land-Services>



**From:** PPRFD Chief <[pprfdchief@gmail.com](mailto:pprfdchief@gmail.com)>  
**Sent:** Thursday, September 12, 2024 4:21 PM  
**To:** Chris McComas <[cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)>  
**Subject:** Re: Fire risk rating forms

I left the French's Fire Risk Rating form on your desk. I took a second look at stokes and need to follow up on the indicated available water supply. I did not see that on first reading.

James Russell

406-826-3900 (office)

406-493-5601 (cell)

[pprfdchief@gmail.com](mailto:pprfdchief@gmail.com)

[www.PPRFD.com](http://www.PPRFD.com)

PO Box 1115 / 20 Old Airport Rd

Plains, MT 59859

On Thu, Sep 12, 2024 at 12:00 PM Chris McComas <[cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)> wrote:

Sounds good. Thank you.

## Chris McComas

Director of Land Services

Sanders County

PO Box 519

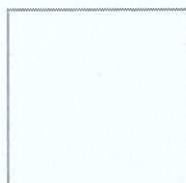
Thompson Falls, MT 59873-0519

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406-499-6573(Cell)

Email: [cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)

<https://co.sanders.mt.us/206/Land-Services>



**From:** PPRFD Chief <[pprfdchief@gmail.com](mailto:pprfdchief@gmail.com)>  
**Sent:** Thursday, September 12, 2024 11:57 AM  
**To:** Chris McComas <[cmccomas@sanderscounty.gov](mailto:cmccomas@sanderscounty.gov)>  
**Subject:** Fire risk rating forms

Hello Chris.

I have two completed fire risk rating forms for you. One for French and one for Stokes. I will be at the LEPC meeting today in Thompson. I will drop them by your office afterwards.

James Russell

## Re: Update Sanders County Fire Risk Rating Form

From: PPRFD Chief (pprfdchief@gmail.com)

To: esa\_french@yahoo.com

Date: Tuesday, September 17, 2024 at 12:35 PM MDT

I hand delivered this to Chris's desk last week on Thursday the 12th. I attached a signed PDF version to this email.

James Russell

Fire Chief | Plains-Paradise Rural Fire District



406-826-3900 (office)  
406-493-5601 (cell)

[pprfdchief@gmail.com](mailto:pprfdchief@gmail.com)  
[www.PPRFD.com](http://www.PPRFD.com)

PO Box 1115 / 20 Old Airport Rd  
Plains, MT 59859

On Tue, Sep 10, 2024 at 3:11 PM Kathleen French <[esa\\_french@yahoo.com](mailto:esa_french@yahoo.com)> wrote:

James,

Enclosed is a second updated Fire Risk Rating Form. Chris McComas is suggesting that the Highways (Both MT Hwy 200 and MT Hwy 135) that run adjacent to the property and provide primary access to the property are NOT the primary access roads, but instead he believes that the internal roads IN the property are primary access roads.

I have no idea which way you want to go with his interpretations. I have provided both Risk Rating Forms for you to work with. Either way, the fire risk for the proposed development is considered low.

Please let me know which form will gain your signature and will be moving forward through this Amendment process.

Thanks...Katy French



PPRFD Fire Risk Rating - French.pdf  
1.8MB



# Sanders County Fire Risk Rating Form

This form may be used to rate the risks from wildfire hazards in new subdivisions and other developments. Conditions anticipated after development of roads, water supplies, etc., should be the focus.

Name of Subdivision: McMillan Post RV Park

Landowner or Subdivider: Mark & Kathleen French

Legal Description: Parcels A & B, COS 1507, Sanders County, MT.

Location: 11 Wild Rose Lane, B515 MT Hwy 200 East, Plains, MT 59859

General Description of Subdivision: Development of 7.0 acres of land at the corner of MT Hwy 135 and MT Hwy 200. RV Park to consist of 16 sites. with a combination of dry and full service amenities with water services.

→ Date of Assessment: \_\_\_\_\_

Name, Qualifications, and Contact Information of Preparer: \_\_\_\_\_

Kathleen C French, 406.260.5918, owner/developer

Verified by local Fire District, DNRC, USFS, or other qualified person: \_\_\_\_\_

→ \_\_\_\_\_  
Signature

→ \_\_\_\_\_  
Date

# Sanders County Fire Risk Rating Form

This form may be used to rate the risks from wildfire hazards in new subdivisions and other developments. Conditions anticipated after development of roads, water supplies, etc., should be the focus.

Name of Subdivision: McMillan Post RV Park

Landowner or Subdivider: Mark & Kathleen French

Legal Description: Parcels A & B, Cos 1507, Sanders County, MT.

Location: 11 Wild Rose Lane, 8515 MT Hwy 200 East, Plains, MT 59859

General Description of Subdivision: Development of 70 acres of land at the corner of MT Hwy 135 and MT Hwy 200. RV Park to consist of 16 sites with a combination of dry and full service amenities. Water services

→ Date of Assessment: 9-12-2024

Name, Qualifications, and Contact Information of Preparer:

Kathleen C French, 406.260.5918, NWNR/developer

Verified by local Fire District, DNRC, USFS, or other qualified person:

JAMES RUSSON, FIRE CHIEF, PLAINS - PARTON RURAL FIRE DISTRICT

→   
Signature

9-12-2024

Date

**Instructions:** Circle the score beside the appropriate descriptions in each subsection, add points, and enter on page 6. Preparers have discretion to assign appropriate scores based on conditions and their judgment.

Section	Attributes	Points
	<b>Vehicular and Emergency Service Provider Access (20%)</b>	
	<b>Ingress/Egress</b>	
MT Hwy 200 MT Hwy 135	Two or more full-time primary access roads	0
	One full-time primary access road with functional secondary or emergency access road	2
	One full-time primary access road	4
	<b>Width of Primary Access Road (driving surface)</b>	
MT Hwy 200 MT Hwy 135	24 feet or more	0
B	20 to 24 feet	1
	20 feet	2
	16 to 20 feet	3
	Less than 16 feet	4
	<b>Width of Secondary Access Road (the road most likely to be used for escape if primary access is blocked or closed)</b>	
1	24 feet or more	0
	20 to 24 feet	1
	20 feet	2
	12 to 20 feet	3
	None or less than 12 feet	4
	<b>Maximum Road Grade of Primary Access Route</b>	
MT Hwy 200 MT Hwy 135	5%	0
D	8%	1
	10%	2
	12%	3
	>12%	4
	<b>Maximum Road Grade of Secondary or Emergency Access Route</b>	
	5%	0
	10%	1
	12%	2

NJ Hwy 135 NJ Hwy 200	F	>12% or none	3
		<b>Primary Access Terminus</b>	
		Primary road connects with another road (i.e., no turnaround necessary)	0
		Fully compliant cul-de-sac or other turnaround	1
		Substandard turnaround but largest fire department apparatus is capable of turnaround under normal summer conditions	2
	H	No turnaround or turnaround in which largest fire department apparatus is incapable of turnaround under normal summer conditions	3
		<b>Length of Primary Dead End Road as Only Full-Time Primary Access</b> (measured from edge of intersecting public road that provides two exit routes, along centerline to road terminus or end of turnaround)	
		600 feet or less, or if primary road does not dead end	0
		600 feet to 1,000 feet	1
		>1,000 feet	3
	I	<b>Road surface conditions</b> (on worst road if more than one)	
		Hard-surfaced (paved), excellent conditions throughout	0
		Hard-surfaced (paved or chip seal), with partial gravel, potholes, or deteriorating conditions that may minimally slow but not hinder emergency service access; or gravel, excellent condition	1
		Gravel, with areas of washboard, potholes, or other deterioration conditions that may slow but not hinder emergency service access	2
		Deteriorating or similar conditions that may slow or otherwise measurably hinder emergency service access	3
	J	<b>Vertical Clearance</b>	
		No obstructions to a height of 13.5 feet or more	0
		Minimal, temporary overhead obstructions under 13.5 feet in height, such as occasional tree branches that emergency vehicles can easily manage	1
		Overhead vegetation less than 13.5 feet in height that may significantly slow or obstruct emergency vehicles	2
		Permanent obstructions less than 13.5 feet in height	3
		<b>Driveways</b> (driveways that exceed 600 feet in length shall be factored as roads above and given a non-compliant rating)	

<i>No Driveways</i>	Driveway lengths do not exceed 600 feet as measured along the centerline from the primary access road to the end of where a fire department water tender will typically park to conduct structural fire suppression	0
	Driveway extends to within 150 feet of all points of occupied buildings	0
	Driveway width exceeds 12 feet	0
	Driveways include a turnaround in which largest fire department apparatus is capable of turnaround under normal, summer conditions	0
	For each aspect a driveway does not comply with the above, assign one point	1 or 2 or 3 or 4
	Driveway includes 13.5 feet of vertical clearance of all obstructions	0
	Driveway does not include 13.5 feet of vertical clearance of all obstructions	2
	<b>Street Signs and Posted Address Numbers</b>	
<i>Minor Trees</i>	Fully present and compliant with rural addressing requirements	2
	Not fully present or compliant	3
<b>Section 1 Subtotal Score (add Sec. 1. A-K above) =</b>		
<i>2 Trees to S.</i>	<b>Vegetation (30%) (see IWUIC definitions below)</b>	
	<b>On-site fuel loads based on mapping and site assessment</b>	
	Light	5
	Medium	10
	Heavy	20
	<b>Predominant fuel types within ½ mile of project site based on mapping and site assessment</b>	
	Light	5
	Medium	10
	Heavy	20
<b>Defensible spaces or fuels reduction at building sites at final plat</b>		
<i>3</i>	Not necessary	0
	No defined building sites or no way to ensure it is carried out	10
	Needed but will not be carried out	20
<b>Section 2 Subtotal Score (add Sec. 2. A-C above) =</b>		
<i>Topography (20%)</i>	<b>Surrounding topography 150 feet to ½ mile from building sites</b>	
	Characterized by typical slopes of 8% or less	1
	Characterized by typical slopes of >8% and <25%	5

<b>3 (cont.)</b>	<b>B</b>	Characterized by typical slopes of >25% and <35%	10
		Characterized by typical slopes of 35% and greater	15
		<b>Topography within 150 feet surrounding building sites</b>	
		Characterized by typical slopes of 8% or less	1
		Characterized by typical slopes of >8% and <25%	5
	<b>C</b>	Characterized by typical slopes of >25% and <35%	10
		Characterized by typical slopes of 35% and greater	15
	<b>Presence of fire chimneys or other hazardous features that may impact the subdivision within ½ mile from buildings and building sites</b>		
	<b>D</b>	No fire chimneys or hazardous features	0
		Fire chimneys or hazardous features exist but are not a common characteristic	3
		Fire chimneys or hazardous features are a common characteristic	5

*Section 3 Subtotal Score (add Sec. 3. A-D above) =*

<b>4</b>	<b>B</b>	<b>Water Sources for Fire Protection (15%)</b>	
		<b>Hydrants/draft sites (choose best water source available)</b>	
		500-GPM hydrant within 500 feet of each building	0
		500-GPM hydrant within 1,000 feet of each building	3
		500-GPM hydrant farther than 1,000 feet from each building, but within 5 minutes, round trip	5
		10,000+ gallon draft site within 1,000 feet of each building	12
		10,000+ gallon draft site farther than 1,000 feet of each building, but within 5 minutes round trip	15
		Water source providing 10,000+ gallons; 5 - 10 minutes round trip including fill time	20
	<b>C</b>	Water source providing <10,000 gallons; more than 10 minutes round trip including fill time	25
		<b>Internal sprinkler systems</b>	
	<b>D</b>	Internal sprinkler systems in all regularly occupied buildings	0
		No internal sprinkler systems in all regularly occupied buildings	5

*Section 4 Subtotal Score (add Sec. 4. A-B above) =*

<b>A</b>	<b>Miscellaneous Fire Dangers (15%)</b>	
	<b>Electrical/power lines</b>	
	All underground	0

<b>5</b>	Some underground, some above	3
	All above ground	5
<b>B</b>	<b>Propane and other gas tanks</b>	
	None	0
	All underground	1
	Above ground or allowed above ground	3
<b>5 (cont.)</b>	<b>Other Risks: Add one point for each if the risk is present or likely to be present on site or present within surrounding ½ mile; add two points for each with multiple occurrences</b>	
	Campsite, picnic area, or home with fire pit	0 or 1 or 2
	Commercial activity	0 or 1 or 2
	Debris burning	0 or 1 or 2
	Domestic wood heat	0 or 1 or 2
	Agricultural operation	0 or 1 or 2
	Lumber mill, mines, other industrial activity	0 or 1 or 2
	Overhead high-voltage powerlines	0 or 1 or 2
	Active railroad	0 or 1 or 2
	Major highway or off-road vehicle trail/road	0 or 1 or 2
	Historic wildfires over last 10 years	0 or 1 or 2
	Others: describe each	0 or 1 or 2

*Section 5 Subtotal Score (add Sec. 5. A-C above) =*

### TOTAL SCORES FROM SECTION 1-5

1
15
6
30
Total Score from Section 5 (Misc. Risks)
<b>TOTAL PROJECT SCORE:</b>
RISK RATING (see range below):

Risk Rating Range:

< 99 = Low Risk

100-130 = Moderate Risk

> 131 = High Risk

## REFERENCES AND MODEL CODES:

The Fire Risk form was developed from several model codes and existing literature. The purpose of this form is to provide a template and guidance for Sanders County regarding best practices and opportunities to mitigate wildfire risk to homes and property. Risk variables should be reviewed by the county, fire personnel, and emergency management officer to identify and prioritize risks most applicable to Sanders County.

### References and Resources

- Department of State Lands Fire Risk Rating for Existing and Planned Wildland Residential Interface Developments in Montana. 1993.
- National Fire Protection Association Wildfire Hazard Severity Form Checklist NFPA 299 / 1144. 2018.
- International Wildland Urban Interface Code Appendix C. 2012.
- U.S. Fire Administration. Wildland Urban Interface Toolkit: Codes and Standards. 2019.
- National Volunteer Fire Council. Wildland Fire Assessment Program. 2019.
- Fire Adapted Communities Learning Network. FAC Self-Assessment Tool. 2019.

### Fuel Type Definitions – see Appendix D, 2012 International Wildland Urban Interface Code

- *Light fuel:* Vegetation consisting of herbaceous plants and round wood less than  $\frac{1}{4}$  inch in diameter. See Fuel Models A, C, E, L, N, P, R, and S.
- *Medium fuel:* Vegetation consisting of round wood  $\frac{1}{4}$  to 3 inches in diameter. See Fuel Models B, D, F, H, O, Q, and T.
- *Heavy fuel:* Vegetation consisting of round wood 3 to 8 inches in diameter. See Fuel Models G, I, J, K and U.