



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I Great Falls, MT 59401
Phone: 406-454-6905 | Fax: 406-454-6919
Email: planningcomments@casadecountymt.gov

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at planningcomments@casadecountymt.gov.

Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

Comment Subject (please check one):

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): SUP #006-2019 BIG SKY CHEESE, LLC - Oversight and Compliance

Comment

TO: PLANNING STAFF, ZBOA MEMBERS, COUNTY ATTORNEY

I have reviewed SUP #006-2019 for Big Sky Cheese LLC, the corresponding Staff Report, and Sections 10 Standards for Special Use Permits, Section 12 Zoning Board of Adjustments, and Section 13 Violations and Penalties.

Many of the SUP Criteria requiring staff analysis prior to presentation to the ZBOA have not been fully investigated or analyzed by staff. Criteria pertaining to permits and studies necessary by other governing bodies have not been included in the SUP. Instead of obtaining these necessary agency comments or approvals of the proposed project, the staff report simply evaluated the applicants narrative and vague references to obtaining agency approvals after receiving the SUP.

Granting the SUP prior to obtaining approvals, permits, or guidelines from agencies like DNRC, MDOT, DEQ, and the Milk and Egg Bureau is premature and provides the applicant opportunity to make significant changes in the design and construction of the proposed plant. Further, not providing the important information from these agencies prior to the SUP approval deletes the public's opportunity to participate in matters of significant community importance.

If the SUP is granted based upon Staff's recommendation Alternative 2 - adopt the staff report and approve the SUP subject to conditions 1 - 11, who is responsible for oversight and compliance? Who will review the agency reports and development changes for compliance with the Criteria specific to Cascade County's SUP process? Who will provide enforcement of the relevant Cascade County zoning standards? Why do the current Zoning Regulations not provide clear direction to planning staff or the building department to monitor and enforce the conditions associated with a SUP?

Thank you and I look forward to a discussion on oversight, compliance, and enforcement.

For Office Use Only

Date Received:	<u>6-25-19</u>	Date Reviewed:	<u>7-3-19</u>	Complete:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Name: TAMMIE LYNNE SMITH

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Comment Subject (please check one):

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): SUP #006-2019 BIG SKY CHEESE, LLC - Subject Parcel Property Taxes

Comment

TO: PLANNING STAFF, ZBOA MEMBERS, COUNTY ATTORNEY

I have reviewed SUP #006-2019 for Big Sky Cheese LLC, the corresponding Staff Report, and Sections 10 Standards for Special Use Permits and Section 12 Zoning Board of Adjustments.

Many of the SUP Criteria requiring staff analysis prior to presentation to the ZBOA have not been fully investigated or analyzed by staff. Page 2, Findings of Fact, Item 3 - "The property is not know to be in violation of any Cascade County, State, or Federal regulations or laws and county taxes are current."

On Aug 02, 2018 Cascade County Treasurer filed Tax Liens on all the MFP, LLC parcels for unpaid property taxes.

A property tax lien is a legal claim against a property for unpaid property taxes. When a county files a tax lien it issues a Tax Lien Certificate verifying that there is a lien in place and the amount of the taxes owed. Tax Lien Certificates are sold for the amount of the delinquent taxes, interest accrued, and other fees. A tax lien does not convey ownership.

On Aug 14, 2018 the original sellers, Huestis et al purchased the Tax Lien Certificates on all the MFP, LLC parcels.

Buying the Tax Lien Certificates guaranteed Huestis et al protection from any 3rd party purchaser and ability to foreclose

On Mar 28, 2019 MFP, LLC paid off all the Tax Lien Certificates to Huestis, et al so the parcels were not encumbered

when the Special Use Permit was filed and the bridge loan was made by Great Falls Development Authority.

Cascade County elected officials, staff, and the Great Falls Development Authority continue to sell this project as a boon for the county tax base. Staff should have included this information in the Findings of Fact to present an accurate

and fully disclosed history concerning the applicant Based upon MFP, LLC's previous and poor track record of paying property taxes in a timely manner, I request the ZBOA board members consider adding an additional condition to any approval of the SUP to regularly monitor property tax payments through the development and construction period.

For Office Use Only

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TO: Cascade County Zoning Board of Adjustments
FROM: Shannon Guilfoyle, 13 Homestake Ln, Great Falls, MT 59405
RE: SUP #006-2019

The following is an excerpt from the Montana Milk Market Regulation Study Final Report published June 4, 2018, pages 79-80:

The largest volume opportunity for Montana is cheese, assuming that it is simple cheddar or something similar. Again, assuming a 20% market share of Montana's cheese sales would equate to 5.36 million pounds of cheese requiring 53 million pounds of milk, or just over 1 million pounds of milk per week.

*In today's market, commodity cheese plants need to process about 1 million pounds per day to be sustainably profitable. The Agropur plant in South Dakota recently announced an expansion that is targeted to ultimately process 9 million pounds of milk per day. **For perspective, all of Montana's current milk production does not equal 1 million pounds of milk per day.****

*Such an investment would have to be based on obtaining significant out-of-State volume in competition with large national plants, and multiple plants in the region, with established shares of the market. **Given the above, we do not see much opportunity for establishing a large cheese operation.*** (*Bold added by this commenter for emphasis.)*

Given the above information, the Staff Report re: SUP for Big Sky Cheese, LLC, states multiple times throughout its document that Big Sky Cheese will utilize locally produced milk which is in direct opposition to the statements made in the Montana Milk Market Report (above) that indicate that Montana does not produce enough milk in one day to sustain a VIABLE full-scale cheese processing facility and will require Big Sky Cheese to acquire a "significant out-of-State volume" of milk per pound in order to compete in current markets:

"... will utilize milk that is produced in and around Cascade County and throughout northcentral Montana." (p. 11, Staff Report)

"The proposed development will be agriculturally based and will use dairy products provided by area farmers and ranchers..." (p. 13, Staff Report)

"...the intent of the proposed project is to develop a value-added dairy processing facility using milk generated by area producers which directly support the development of a value-added agriculture industry." (p. 21, Staff Report)

There is no indication in the Staff Report that Montana will need to import a significant amount of milk in order for Big Sky Cheese to be a fully viable, value-added agricultural business.

Furthermore, it's difficult for a reader of the Staff Report to imagine a cheese processing facility that will employ 5-10 employees yet needs to be "...designed by a team of trained professionals who specialize in large-scale developments and subdivisions as well as food processing plants of this nature." (p. 18, Staff Report) To be fair, the Montana Milk Market Regulation Study Final Report published June 4, 2018, page 80 does indicate that:

...it may be feasible to start small and produce cheese that would be sold as a premium private label cheddar or other specialty cheese, at a premium price. Once established, it may be possible to expand the plant to offer additional products that target certain commodity cheese on the open market.

The report also indicates that "...a very small cheese plant, producing 30,000 to 60,000 pounds per year (13,000 kg to 27,000 kg) could be built for \$350K to \$600K." (p. 80) Again, it's difficult to imagine that Big Sky Cheese would need a "... team of trained professionals who specialize in large-scale developments..." (p. 18, Staff Report) to build a facility that would only employ 5-10 employees and needs a \$2.271 million dollar bridge loan from GFDA to support pre-construction costs. Again, in direct conflict with research from the Montana Milk Market Regulation Study.

Given this information, is there not an expectation that Big Sky Cheese, LLC demonstrate financial capability to invest in a project that, according to the Montana Milk Mark Regulation Study, indicates that they do not see much "opportunity" for a large-scale cheese processing facility in Montana?

TO: PLANNING STAFF, ZBOA MEMBERS, COUNTY ATTORNEYS
FROM: Shannon Guilfoyle, 13 Homestake Ln, Great Falls, MT 59405

My name is Shannon Guilfoyle and I am on the leadership team for Montanans for Responsible Land Use.

Montanans for Responsible Land Use (MfRLU) is a grassroots organization consisting of 170 (confirmed) Cascade County citizens. This count does not include multiple members in a single household. Formed in January 2018, MfRLU's mission is to support responsible land use and development in Cascade County. The leadership team consists of seven members. The team conducts regular group meetings and provides reliable updates to members concerning the issues, public comment periods, scheduled hearings, instruction for public comments, and navigating the Planning website.

MfRLU has a contractual agreement with Montana Environmental Information Center (MEIC) as its Fiduciary Trustee for donations/fund development. MfRLU receives financial support from its members through MEIC and a number of non-profit supporters. The team is also tasked with hiring land use experts, consultants, and attorneys. MfRLU hired Kate McMahon, AICP, in 2018 to assist its members with the original proposed MFP, LLC development and subsequent actions including Cascade County's proposed new zoning regulations, the statutory review of the county Growth Policy, and now the Big Sky Cheese, LLC SUP.

The 170 members include:

- a. agricultural, residential, commercial, and industrial landowners.
- b. large and small scale AG producers, medical, financial, education, government, and manufacturing professionals, as well as industrial, manufacturing, and related hourly workers.
- c. currently employed and retired individuals.
- d. citizens ranging in age from mid-20's to 80's.
- e. individuals and families committed to their community and a collective objective to ensure responsible economic growth and stability for Cascade County.

Many of our 170 members have entrusted the team to provide public comment and participate in public hearings on their behalf. Like any corporation or business, for profit or non-profit, the few speak for the many.

The Public Comments submitted by Kate McMahon concerning the Big Sky Cheese, LLC SUP, accurately reflect the views and opinions of all 170 members. We support responsible land development and economic growth. Ms. McMahon submitted the following individual comments, on behalf of MfRLU, addressing:

1. Memo #1 Legal Description and Public Notice SUP #006-2019 (Big Sky Cheese)
2. Memo #2 Transportation and Public Access Issue
3. Memo #3 Growth Policy Consistency
4. Memo #4 Fire Protection
5. Memo #5 Wastewater

Thank you for considering both the pros and cons of the proposed Big Sky Cheese plant.



4600 Giant Springs Road
Great Falls, MT 59405
406-454-5840

June 24, 2019

Sandor Hopkins
Cascade County Planning Division
Public Works Department
Cascade County
121 4th St. N., Suite 2H/I
Great Falls, Montana 59401

Re: Big Sky Cheese – Special Use Permit Application

Dear Mr. Hopkins:

As the state agency providing stewardship of Montana's fish, wildlife, parks and recreational resources, Fish, Wildlife and Parks (FWP) is tasked with reviewing proposed projects and activities such as this one and providing information and recommendations to help decision-makers reduce potential impacts to these resources. We hope the information we provide is useful for Cascade County's review of the Madison Food Park, Big Sky Cheese application.

Similar to earlier comments we made regarding the proposed Madison Food Park, our primary focus is on how the project might impact the amount and quality of water in area streams that provide fish and wildlife habitat, as well as possible impacts to recreational opportunities. We understand this project is in the early planning stages and would eventually require state permits as the project progresses. When the applicant applies for permits, FWP will also provide input to the permitting agencies.

Given that detailed plans are lacking at this stage and the other state permitting processes have not started, we cannot provide detailed comments about how this project might impact water use and quality as it pertains to habitat and recreation. However, Big Sky Cheese proposes to tap the Madison Aquifer for an annual volume of 10.3 acre-feet. While the proposed water use is nowhere near the 2,836 ac-ft that was being proposed for the Madison Food Park, this is still a significant withdrawal of water even for a prolific aquifer such as the Madison, particularly considering the ongoing development of the Madison Aquifer in the Great Falls area by small wells exempt from regular water right permitting. We recommend Cascade County Planning Division consider the cumulative impacts to water development on the Madison Aquifer of this and other developments.

The Madison Aquifer is the source of water for Giant Springs. The proposed water use of the Madison Aquifer water by Big Sky Cheese and potential future water use by the larger Madison Food Park project could impact the output of Giant Springs and should be considered in your

decision-making process. If the project moves forward, the nature and extent of this impact should be closely monitored and evaluated as Giant Springs supplies water to the Giant Spring Trout Hatchery, Giant Springs State Park, the Malteurop malt processing facility and Source Giant Springs water bottling plant. Giant Springs also provides a considerable outflow to the Missouri River. The Missouri River, except during spring runoff, does not meet the existing water demand on the river. Reductions in the Madison Aquifer could negatively impact the ability to supply these vital water uses dependent on Giant Springs.

Not only is Giant Springs important as a water supply to existing water uses, it is the highlight of Giant Spring State Park. The societal and cultural importance should be considered when evaluating any project that would potentially impact Giant Springs hydrologically, ecologically or visually.

Another consideration is that grizzly bears are moving down from the Rocky Mountain Front into the valleys, including the Great Falls area. Based on 2017 observations, grizzly bears may travel through and use the area proposed for Big Sky Cheese and the Madison Food Park. These bears are part of the North Continental Divide Ecosystem population, which is listed as threatened under the federal Endangered Species Act. The proposed project should avoid attracting grizzly bears and other wildlife. Please see FWP's Living with Wildlife website (<http://fwp.mt.gov/fishAndWildlife/livingWithWildlife/>) for guidance, such as planting native landscaping that will not act as an unnatural attractant for wildlife such as bears.

The project should also consider the potential for an increase in stormwater and implement appropriate mitigation strategies.

FWP recommends that the Cascade County Planning Division consider potential cumulative impacts when considering the Big Sky Cheese application, including potential impacts that may be associated with subsequent applications by Madison Food Park in this area.

Thank you for the opportunity to offer input. Please contact Gary Bertellotti, Region 4 Supervisor, at (406) 454-5840, if you have any questions.

Sincerely,



Gary Bertellotti
Regional Supervisor

FOR OFFICE
USE ONLY

Date Received: 6-28-19
Date Reviewed: 7-3-19
Complete: Yes No *Int. Agency*

WALKER S. & TAMMIE LYNNE SMITH

397 Highwood Road
Great Falls, MT 59405

June 26, 2019

Cascade County Planning Division
Attn: Zoning Board of Adjustment

Hearing: June 27, 2019
5:00 pm
Expo Park - Family Living Center
Great Falls, Montana

Subject: SUP #006-2019 Big Sky Cheese, LLC

Board Members,

I have reviewed SUP #006-2019 for Big Sky Cheese, LLC, the corresponding Staff Report, and Section 10 – Standards for Special Use Permits, Section 12 – Zoning Board of Adjustment, and Section 13 – Violations and Penalties of the current zoning regulations. I have also spent considerable time reviewing the related Montana statues and the onslaught of media coverage concerning the cheese plant and future references to a slaughterhouse and distillery the same developer is considering.

Applicants for Special Use Permits in Cascade County are required to prepare and submit to the planning division and Zoning Board of Adjustments sufficient information to satisfy well-defined permit criteria. Zoning regulations state that a SUP may be issued only upon meeting all requirements in the regulations related to Permitted Upon Issuance of a Special Use Permit as provided in Section 10.

The SUP criteria covers specific development and/or construction practices related to public health and safety, the impact of such development to the value of adjoining property, whether the development will be in harmony with the existing area, and if the proposed development will be consistent with the Cascade County Growth Policy.

The ZBOA has received many public comments about traffic concerns, water supply worries, fire protection deficiencies, wastewater and environmental demands, and storm runoff. However, the ZBOA is also tasked with determining if the proposed development is consistent with the goals and objectives of the Cascade County Growth Policy.

The SUP criteria specifically state the proposed development sustain and strengthen the economic well-being of Cascade County, diversify the tax base by sustainable use of its natural resources, pursue business development that complements existing businesses, promote strong local business environment, improve local trade capture, and most importantly protect and maintain the county's agricultural economy.

Please consider the following information concerning the development and the developer:

1. Can a processing facility that adds value to milk in the conversion to cheese really be feasible if none of the dairy producers in the state, the Montana Milk Control Bureau, nor the Montana Milk and Egg Bureau have been contacted or included in its development?

June 26, 2019

Cascade County Planning Division

Page 2

2. If the majority of the acreage owned by MFP, LLC has been leased in a multi-year agreement to an adjacent Hutterite Colony for an upfront payment of \$500,000, how can the parcels Big Sky Cheese, LLC need for building road access, the potential holding ponds and spray irrigation areas, and the water supply wells be approved for any type of development?
3. Further, when MFP, LLC executed the multi-year lease agreement why was it not disclosed in good faith to the public?
4. Cascade County filed Tax Liens on all the MFP, LLC parcels in August 2018 for past due property taxes. The Tax Liens were paid by the original seller. MFP, LLC did not pay off the Tax Lien Certificates until March 2019 when trying to obtain a \$2.3M bridge loan from Great Falls Development Authority and file the Special Use Permit Application. Does this sound like a business enterprise interested in sustaining and strengthening the economic well-being of Cascade County?
5. The Big Sky Cheese, LLC website makes many contradictory statements about itself and its business model. "Big Sky Cheese, LLC was *established only recently* but has been contemplated for many years. Just like in all business development, building the facility and creating a "Montana Pride" brand of cheese will take some time, patience, and of course investments. However, Big Sky Cheese has a clear marketing plan and an *80 year track record.*" " Big Sky Cheese produces...using fresh milk from cows not treated with antibiotics, hormones, or animal by products. No GMO grains. Our approach has won many awards on the world stage." Product marketing is one of the most creative industries in today's internet driven economy. However, there are not any dairies, locally or regionally, that produce milk with Big Sky's famed approach. How does this fit into the criteria of promoting a strong local business environment, improving local trade capture, or maintaining the county's agricultural economy?
6. Is the ZBOA comfortable and confident that MFP, LLC and/or Big Sky Cheese, LLC, is presenting a financially viable project? Producer commitment, adequate financial capital, owner financial solvency, disclosure of potential foreign investment, etc.
It was just a few years ago the ZBOA, Cascade County Commissioner's, and the City of Great Falls capitulated to the unrealistic and overzealous plans of SME and its old technology Coal Fired Energy Plant. Six years of legal battles culminated in the MT Supreme Court ruling that the county had violated state spot zoning laws. SME changed course and developed a Natural Gas fired plant that was dead on arrival. What remains today is a vast field of concrete foundation that will never be returned to the Prime Agricultural land of statewide importance that it once was. It was a costly mistake. Are you willing to make those same mistakes again without further exploring the true financial feasibility of this project?

The ZBOA has the authority to approve the Big Sky Cheese, LLC SUP on the technical components by relying on other agencies such as MDOT, DNRC, DEQ, and the Dep.t of Livestock to provide oversight and compliance. However, it is up to the ZBOA to ensure that the criteria related to the goals and objectives of the Cascade County Growth Policy are fully satisfied.

Thank you,

Tammie Lynne Smith



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Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

Comment Subject (please check one):

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): Big Sky Cheese

Comment

- 06.19.19 Cascade County & City of Great Falls
- 06.19.19 New & Revised Definitions
- 06.20.19 Special Use Permit
- 06.20.19 Commercial Dairy Zoning
- 06.22.19 Carbon Footprint of Cheese Production ZBOA
- 06.25.19 Highlights MT Milk Study ZBOA
- 06.26.19 Waste Management Issues for Dairy Processors ZBOA
- 06.26.19 Big Sky Cheese Recommendations ZBOA
- 06.26.19 Public Participation ZBOA
- 06.26.19 Life Cycle Assessment of Cheese & Whey ZBOA
- 06.26.19 Treatment of Dairy Wastewater ZBOA
- 06.27.19 Big Sky Cheese Parcels Public Notice ZBOA
- 06.27.10 Big Sky Cheese Findings on Analysis ZBOA
- 06.27.19 Big Sky Cheese Growth Policy Compliance ZBOA

For Office Use Only

Date Received:	<u>6-27-19</u>	Date Reviewed:	<u>7-3-19</u>	Complete:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

June 27, 2019

PUBLIC COMMENTS ZBOA

MFP BIG SKY CHEESE SUP COMMENTS ON STAFF REPORT PART I

Findings with Respect to the Analysis Criteria

1. The property is in the Agricultural (A) Zoning District. The proposed use is allowed in the Agriculture District pursuant to Section 7.2.4(27) of the Cascade County Zoning Regulations.

- **2014 CCGP SECTION 11.1 AGRICULTURE**
“All aspects of farming or ranching, including the cultivation or tilling of soil; dairying; the production, cultivation, growing, harvesting of agricultural or horticultural commodities; raising of livestock, bees, fur-bearing animals or poultry; and any practices including forestry or lumbering operations, including preparation for market or delivery to storage, to market, or to carriers for transportation to market.”
- **The prevailing land use in Cascade County is rural agriculture (farmland for crops and livestock grazing), with only 4% of the county classified as “Developed Area” (most of that development is in and around Great Falls and outlying small communities), and 96% of the prevailing use is agriculture, forestland or rangeland. It is important to maintain this agricultural district with the purpose of protecting prime farmland.**
- **Most of the Special Uses that have been granted are in the area designated as MU-20 in the 2019 Cascade County Proposed Zoning Regulations.**

2. The proposed development will not materially endanger the public health or safety.

a. Traffic conditions in the vicinity, including the effect of additional traffic on streets and street intersections, and sight lines at street intersection and curb approaches:

- **Transportation concerns include:**
 - **The applicant reports “52 vehicle trips per day”, including 5-10 employees.**

C.K. Craven
Homeowner

department use. The fire storage which may be used for regional firefighting activities will benefit all residents and land owners in the general vicinity of the project.”

- *Staff responded that “Fire protection will be provided by Sand Coulee Volunteer Fire Department, and the applicant intends to provide on-site water storage and booster pumps to provide onsite fire protection.”*
- **Please provide the well capacity or capacity of onsite storage tanks and confirm if these will be adequate for fighting fires associated with industrial buildings. The National Fire Protection Association (NFPA) has a publication with such standards. *Per Kate McMahon, Consultant***
 - **Concerns also with adequate response time from the volunteer fire department plus concerns about adequate paved roads for fire trucks to access the site and the available water in all weather conditions.**
- **Recommend the ZBOA require the onsite storage tanks be constructed according to the NFPA standards and inspected and approved by the Sand Coulee Fire Department. *Per Kate McMahon, Consultant***

c. Soil erosion, sedimentation, and stormwater run-off.

- **In addition to stormwater issues during construction, the large building footprints with increased impervious surfaces may contribute to stormwater run-off.**

d. Protection of public, community, or private water supplies, including possible adverse effects on surface waters or groundwater

- **Because of the geology of this area, the Madison Aquifer in Cascade County has high connectivity with all the streams down to the Missouri River. If pollution is dumped on farmland (in lagoons or spray on fields), it WILL seep through to the groundwater. According to the Bureau of Mines and Geology, this part of the Madison Aquifer is a “quick fill – quick release”. We need to know more about the risks of pollutants seeping through to groundwater. Impacts from unexpected droughts and floods due to the uncertainties of climate change could drastically change the quality and quantity of our water. Goal 8 in our growth policy instructs to “Protect surface and groundwater quality from pollution”. It says “protect,” not “mitigate the damage”. This goal was not even mentioned in the applicant’s SUP, despite instructions to “address all the objectives and, if not applicable, to state why”.**
 - **MT Bureau of Mines report on the Madison Aquifer in Cascade County states “Climate, or more specifically precipitation, appears to be the primary water-level control”**
 - **Droughts & floods would have significant impact**

- Cheese production yields 10% cheese with the remaining 90% a liquid by-product called whey. Some cheeses are salted by spreading salt grains on the curds, which then draws out more whey. This additional liquid waste is called "salt whey."
 - MFP reports 350 lbs/day of solid waste
 - MFP reports 9,716 gpd liquid whey, which will be hauled to area ranchers and used as food source, and 12,960 gpd liquid process wastewater, which will be treated onsite and reused as irrigation/nutrient source for onsite crops.
 - MFP reports daily whey wastewater trucks @ 1.21 trucks/day x 8,000 gallons/truck. Total = 9,680 gallons whey wastewater/day, 48,400 gallons/week and 2,516,800 gallons/year. The applicant states that whey wastewater will be hauled away. They further report the total process wastewater generated will be 13,000 gallons/day and 3,380,000 gallons/year. The process wastewater will be retreated using nutrient reduction/removal technologies, ten seasonally stored in treatment/holding cells, followed by beneficial reuse in the form of land application of treated effluent on approximately 10-15 acres of cropland, either onsite or on adjacent farmland.
 - Would like to know the chemicals from equipment cleaning and from processing wastewater that will have to go someplace.
 - There are concerns about where the whey wastewater goes in winter and about noxious odors from the wastewater on sprayed fields.

- How much whey is in the process wastewater, plus what chemicals?

- The staff report did not contain any analysis of this information and there was no indication that the MT DEQ reviewed or commented on the information provided.

- The estimated 13,000 gallons per day of wastewater is equivalent to approximately a 50 lot residential subdivision. *Per Kate McMahon, Consultant*

- Given the amount of wastewater that will be generated, along with the type of wastewater associated with food processing, the ZBOA should require that a preliminary engineering report be submitted with the SUP to potential wastewater related problems per the DEQ Circular. This information should be available prior to

approval in order to determine that the proposed system will not materially endanger public health and safety. *Per Kate McMahon, Consultant*

- **A preliminary engineering report and review by the Department of Environmental quality may identify water quality issues and other environmental concerns that would require a change in the design of the wastewater treatment system or other mitigation measures that would be of concern to adjacent land owners and members of the public. The only reasonable opportunity for the public to participate in such decisions is to have more detailed information available at the public hearing stage for the special use. In accordance with Section 10.9 of the Cascade County Zoning Ordinance, such information should be submitted as part of the SUP application and should be the basis for “factual” evidence to support findings of fact BEFORE the BOA can approve a SUP.**

Soils & Wastewater Disposal

According to the USDA Soil survey, “Soil properties are important considerations in areas where soils are used as sites for the treatment and disposal of organic waste and wastewater. Selection of soils with properties that favor waste management can help to prevent environmental damage.”

- "Somewhat limited" indicates that the soil has features that are moderately favorable for the specified use. The limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected.
- "Very limited" indicates that the soil has one or more features that are unfavorable for the specified use. The limitations generally cannot be overcome without major soil reclamation, special design, or expensive installation procedures. Poor performance and high maintenance can be expected.

Exhibit E from the SUP Permit application, indicates the location of the potential holding ponds and spray irrigation areas for the wastewater treatment system. As indicated by the attached soil reports, the location of the two spray irrigation areas are on soils that are partially rated as “Very limited” and “Partially rated as Somewhat limited” for spray irrigation.

The potential holding ponds that are on the subject property is located on soils that are entirely rated as “Very limited” for holding ponds that are described in the “Slow Rate Treatment of Wastewater” method of treatment. The location of the potential holding ponds on the parcel to the south of the cheese plant is also rated as “Very Limited”. The potential holding ponds to the west of the proposed cheese plant are on soils partially as “Somewhat limited” and partially as “Very Limited”

Given the potential soil limitations, it is important that the applicant provide more analysis regarding the potential location of wastewater facilities and suitability of soils. Additional analysis may result in relocating the areas designated for potential holding ponds and irrigation areas. This could also affect the overall location and layout of the cheese plant on the site plan. *From Kate McMahon, Consultant, Memo #5 Wastewater*

3. The proposed development is a public necessity, or will not substantially impact the value of adjoining property.

- The proposed cheese plant is certainly not a public necessity and, according to research studies, there is a likelihood of lower property values in the area.
- The visual and environmental disturbance is not compatible with our county's "rural character" (*Goal 2*), "preserving Cascade County's scenic beauty and conserve its forests, rangelands and streams" (*Goal 2B*), "the intrinsic natural beauty of grazing areas, farmlands, and forests" (*Goal 2A & Goal 9*), "preserve Cascade County's open spaces" (*Goal 2C*) and "protecting and maintaining Cascade County's rural character" (*Goal 11*). These goals are not in alignment with a commercial manufacturing industry on scenic farmland in a peaceful and beautiful rural setting.

a. The relationship of the proposed use and the character of the development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

- The surrounding area is rural farmland with a few private residences on small acreages. There is no manufacturing or industry in the area. Cascade County has a large agricultural district for crops and grazing livestock, with minimal development.

b. Whether the proposed development is so necessary to the public health, safety, and general welfare of the community or county as whole, to justify it regardless of its impact on the value of adjoining property.

- This proposed development is not necessary.

4. The proposed development will be in harmony with the area in which it is located.

- The proposed plant will not be in harmony with the area in which it is located. It is located on agricultural land for crops and grazing with no manufacturing or businesses in the area. The project will include increased truck traffic, lights, noise and odors from whey on the spray fields and lagoons. There will be a negative visual impact as this area is truly representative of the "county's rural character" (*Goal 2*), "preserve Cascade County's open space setting" (*Goal 2C*) and "scenic beauty" (*Goal 2B*) and "the intrinsic natural beauty of grazing areas, farmlands, and forests" (*Goal 9*).

a. The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

- The applicant stated the one-mile buffer will help mitigate any perceived conflicts with the existing residences. He did not suggest any conflict resolution strategies.
- This area is farmland and grazing, manufacturing and industry is not in harmony with the area. It is near Great Falls and will impact traffic on 10th Avenue South, which is the primary east-west transportation corridor.

5. The proposed development will be consistent with the Cascade County Growth Policy.

- See Part II

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carolyn K. Craven', with a long horizontal flourish extending to the right.

Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

C.K. Craven
Homeowner

Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

June 27, 2019

PUBLIC COMMENTS ZBOA

MFP BIG SKY CHEESE SUP COMMENTS ON STAFF REPORT PART II

5. The proposed development will be consistent with the Cascade County Growth Policy.

a. Consistency with the growth policy objectives for the various planning areas, its definitions of the various land use classifications and activity centers, and its location standards.

From the SUP Instructions...

Explain how the proposed use will be consistent with each of the Cascade County Growth Policy goal objectives. **All objectives must be discussed.** If an objective is not applicable, please explain why. The more information you can provide, the easier it is for staff and the Zoning Board of Adjustment to review the application.

- There is insufficient consistency with the 2014 CCCGP. The applicant did not follow instructions above and did not explain why so many objectives were not addressed.
- The applicant addressed 5 of the 13 goals in the Growth Policy and 27 of the 94 objectives. Only some of the goals and objectives were addressed, despite the above instructions.
 - 5 of 13 goals = 38% of the growth policy goals
 - 27 of 94 objectives = 28% of the growth policy objectives
 - Of the 27 objectives addressed, 10 were supporting economic growth.
 - 10 of 27 objectives = 37% of the objectives are only about economic growth (Goal 1 Objectives A-J)
 - Some of the objectives used could not be justified as supporting the goal. The numbers above do not include those in question.
- Of the 5 goals and 27 objectives discussed in the applicants SUP, one goal and accompanying objectives accounted for 37% of the applicant's justification for supporting the Growth Policy goals (Goal 2 Objectives A-J).

C.K. Craven
Homeowner

- **NOT EVEN MENTIONED** were 8 goals and 67 objectives, despite instructions stating “All objectives must be discussed. If an objective is not applicable, please explain why”.

The goals and objectives discussed do not include surface and groundwater quality and sustainability, impact to wildlife habitat and corridors, transportation, environmental concerns and climate changes (including floods/droughts) affecting the Madison Aquifer.

Goal 1: SUSTAIN AND STRENGTHEN THE ECONOMIC WELL-BEING OF CASCADE COUNTY’S CITIZENS.

A. Stimulate the retention and expansion of existing businesses, new businesses, value-added businesses, wholesale and retail businesses, and industries including agriculture, mining, manufacturing/processing and forest products.

- The cheese plant will support local dairies to a small extent, but not enough to make a difference in Montana’s surplus milk supply. Our country has a surplus of cheese. This plant might provide an artisan cheese, per news reports, which would have a local/regional market.

B. Stabilize and diversify the county’s tax base by encouraging the sustainable use of its natural resources.

- The applicant is “researching the possibility of incorporating wind turbines, solar energy, and other renewable energy alternatives to utilize sustainable resources and offset some of the energy requirements for the site.” He has not made any specific commitments to wind or solar sustainable energy.
- Sustainable wind or solar energy would be beneficial. The applicant has not committed to anything sustainable at this point. Of concern is the amount of whey wastewater and the limited seasonal ability to spray crops with the whey wastewater. This business will use a large amount of water at a time when water sufficiency around the country is becoming an issue due to the variations and uncertainties about our changing climate.
- Has the county offered or do they intend to offer any tax incentives for this business?

C. Identify and pursue primary business development that complements existing business, which is compatible with communities, and utilizes available assets. Identify and pursue targeted business development opportunities to include, but not limited to, manufacturing/heavy industry, telecommunications, and youth/social services.

C.K. Craven
Homeowner

- The applicant stated “The proposed business is primarily agriculturally based which complements the existing primary business of area residents and maintains compatibility with the surrounding area and County as a whole. The business will also utilize dairy products provided by area residents which will help strengthen the local economy.”
- **There is no manufacturing in the greater area, so the proposed business does not complement the surrounding area. The applicant did state the cheese will be produced from milk purchased from area farmers. The applicant has not provided the expected cheese output in pounds daily/weekly/yearly, so it is difficult to predict a positive impact on the local economy. That information was conspicuously absent in the Special Use Permit.**

D. Promote the development of cultural resources and tourism to broaden Cascade County’s economic base.

- The applicant stated “Given the facility's location and the buffer zone provided by the size of the property relative to the location of development, the dairy processing facility will have no impact on cultural resources or existing tourism opportunities.
- **This does not support the above objective. The applicant acknowledges there will be no impact to tourism.**

E. Foster and stimulate well-planned entrepreneurship among the county’s citizenry.

- The applicant states that “the MFP Development project has the potential to act as an economic catalyst for both aligned and peripheral value-added agriculture business ventures and entrepreneurial start-ups to locate their business enterprises in Cascade County to take advantage of the capacity, infrastructure, and market access directly created by the MFP development.
- **This may be referencing future development the applicant has in mind. However, the goal above state “well-planned entrepreneurship among the county’s citizens” and I dispute that “the county’s citizens” are planning new start-up entrepreneurships. This planned development is for the few, not the many.**

F. Promote a strong local business environment. Encourage and strengthen business support mechanisms such as chambers of commerce, development organizations and business roundtable organizations.

- The applicant is leasing MFP land to Big Sky Cheese. He states “Extensive investment in infrastructure by the principals in MFP, working in collaboration with both the County and State, will provide the local business community, local government, and community development corporations with a necessary tool to promote business development across the region”.

C.K. Craven
Homeowner

- The applicant's responses to "E" and "F" appear to be about future businesses the applicant might be promoting, which may or may not be consistent with what the citizens of Cascade County want.

G. Improve local trade capture for Cascade County businesses. Promote local shopping as well as well-planned businesses and new businesses.

- The applicant states "As indicated in the initial projection compiled by principals of the MFP development, when operating at peak capacity, the dairy processing facility will directly employ 5-10 fulltime employees. The projected influx of workers and their families will have a positive economic impact on the community, including existing and expanding business enterprises such as manufacturing, wholesale, retail, distribution, etc.
- It is my impression from various news and other documents that the 5-10 workers mentioned in the media would likely come from our local communities. But "*the projected influx of workers and their families will have a positive impact on the community*" directly infers that the workers will not be from our local communities. If the applicant is referring to future MFP developments in large-scale intensive uses, the influx of other workers would likely happen. The extensive social research in large-scale intensive uses records a negative impact on the community in those situations.

H. Network with and support other economic development efforts in the region and statewide, in recognition of Cascade County's interdependence with other communities and to leverage available local resources.

- No new responses from the applicant.

I. Encourage the growth of the agricultural economy.

- The applicant states that "The central development concept guiding the MFP project is the support and expansion of local dairy farms, stabilization of related markets and expansion of product supply chains, along with investment in agribusiness-based enterprises which directly support farmers and ranchers across the golden triangle and the state of Montana."
- According to the 2018 MT Milk Market Regulation Study Final Report, which was adopted by the MT Board of Milk Control, the largest volume opportunity for Montana is cheese, assuming that it is simple cheddar or something similar. Again, assuming a 20% market share of Montana's cheese sales would equate to 5.36 million pounds of cheese requiring 53 million pounds of milk, or just over 1 million pounds of milk per week. In today's market, commodity cheese plants need to process about one million pounds per day to be sustainably profitable.

- Given the above, we do not see much opportunity for establishing a large cheese operation. However, it may be feasible to start small and produce cheese that would be sold as a premium private label cheddar or other specialty cheese, at a premium price.
- The total milk supply in Montana for calendar 2017 was about 280 million pounds of which about 147 million pounds (17.093 million gallons) was utilized for Class I sales in Montana. This leaves about 364,000 pounds (42,325 gallons) per day of potentially available milk with some seasonal swings. This puts Montana in the position of too much milk for small plants and not enough for large plants. In other words, small plants, such as described above, may be viable, but will not go very far in utilizing the current volume of Surplus milk in Montana whereas large plants would require much more.
- Montana is not in the position to enter the commodity cheese market, which requires plants with low productions costs that could process 1-2 million pounds of cheese daily, the report states. But smaller facilities, which require a strong branding strategy, could produce specialty products, typically using 3,000 to 30,000 pounds (348 to 3,488 gallons) of milk daily. Such plants would not have much of an impact on the surplus milk situation in Montana, the report finds.
- Of note, cheese is produced from Class III milk and, per this report, “Montana Pool Processors currently do not make Class III products”.

J. Stimulate the growth of the economy by encouraging the use of alternate methods of energy production, including wind energy.

- The applicant states “The principals of MFP are committed to introducing green technology to the property in the near future, where possible and if deemed feasible. At present, MFP is in discussions with renewable energy companies and will continue to consider technologies that may be viable for the site and would complement the dairy processing facility. The design and development of the facility will reflect a commitment to incorporating alternative energy and energy efficient technology, whenever possible”.
- Being “committed to green technology...where possible and if deemed feasible” does not necessarily mean it will happen.

GOAL 2: PROTECT AND MAINTAIN CASCADE COUNTY’S RURAL CHARACTER AND THE COMMUNITY’S HISTORIC RELATIONSHIP WITH NATURAL RESOURCE DEVELOPMENT

A. Foster the continuance of agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests.

- The applicant states “The ongoing agricultural operations will include irrigated farmlands for the beneficial reuse of treated effluent. Additionally, the proposed buffer around the facility will maintain existing ag-related lands to help maintain compatibility with adjacent farm and grazing lands. The availability of additional water for irrigation of crops will help entice continued agricultural use of the property as potential crop yields are increased.
- **It is my understanding that the area in which the proposed processing plant would be located has historically been dryland farming. Will the process wastewater spray be free of noxious odors?**

B. Preserve Cascade County’s scenic beauty and conserve its forests, rangelands and streams, with their abundant wildlife and good fisheries.

- The applicant states that “No streams or existing fisheries will be impacted by the proposed project”.
- **If something goes wrong (increased porosity of soils, unexpected rains and floods, accidental spills, etc.), they can seep into the groundwater and into the streams. The main environmental problems related to milk production affect the pollution of water, air and biodiversity. They often cause a growth of algae and bacteria that consume oxygen in the water and eventually suffocate the rivers leading to the gradual disappearance of fish. The major mechanisms for nutrient removal in soil based treatment systems are,**
 - Plant uptake and incorporation in animal products
 - Adsorption and immobilization in the soil
 - Losses to the atmosphere
 - Losses to groundwater (leaching).

From 2016 Review of Dairy Effluent in Wastewater
- **The biological oxygen demand (BOD) for cheese wastewater is 10x that of domestic sewage**

C. Preserve Cascade County’s open space setting by encouraging new development to locate near existing towns and rural settlements and by discouraging poorly designed, land subdivisions and commercial development.

- The applicant states “the project is agriculturally based and the developed parcel will house the proposed structures, wastewater treatment and storage system components, and farmland for the beneficial reuse of treated effluent; therefore, developing the project near an existing town was not feasible. The project does include large areas of open space and farmland which will maintain the County’s existing open space setting.”
- **The proposed development is encroaching on the open space in this area. There is no guarantee the applicant will not propose development on the remainder of the land owned.**

D. Assure clean air, clean water, a healthful environment and good community appearance.

- The applicant states “the development plan will include design measures directly targeted at mitigating odors, noise and light pollution. The principals of MFP are committed to planning and design concepts, construction materials and landscape features to ensure that clean air, water and a healthful environment are maintained during construction as well as after the dairy processing facility is in full operation.

Please note that Goal 8 in the growth policy was not addressed. The 9 objectives that are part of this goal were among the 67 objectives not addressed of the total 94 objectives in the GP.

GOAL 8: Protect surface and groundwater from pollution.

- **Clean air**
 - **Design measures are nice, but there are known noxious odors with cheese plant effluents. What is the plan to prevent odors? If effluent irrigation causes noxious odors what would MFP have as an alternative to spraying irrigation of the effluent? What is the plan in winter?**
 - **Will the applicant monitor odors?**
 - **How will the applicant respond to neighbor complaints of odors?**
 - **Dairy wastewater is associated with large amounts of greenhouse gases (GHG) and other environmental impacts when compared with most foods of similar nutritive content.**

- **Clean water**
 - The cheese plant will use some prime farmland plus water wells from the Madison Aquifer. There are numerous uncertainties about the sustainability of the aquifer in Cascade County as it is “precipitation dependent”, meaning when we go without rain the water levels are really low. Climate change uncertainties can include unexpected droughts and floods. The high connectivity of the Madison Aquifer with groundwater, streams and rivers can transport accidental pollution to the Missouri River and Giant Springs.
 - Water use, both consumption and effluent, is a concern.

E. Support the development of natural resources including but not limited to timber, mining, oil and gas production, and renewable energy production.

- The applicant states “while MFP will not directly support development of timber, mining or oil & gas production, renewable energy options are being considered for the property if and when deemed feasible”.
- The applicant states he is exploring options. He has not made a commitment yet to any renewable energy options.

F. Continue to work with federal and state agencies to redevelop properties within Cascade County which are currently undergoing Superfund and Brownfields process.

- This is not applicable since this is not a Superfund or Brownfield site

GOAL 3: MAINTAIN AGRICULTURAL ECONOMY

A. Protect the most productive soil types.

- The applicant stated “As shown on the soil report, portions of the property acquired by MFP are considered Prime Farmland or Farmland of Statewide Importance. As noted above, a large portion of the site will, following development of the dairy processing facility, continue to be utilized for agricultural activities. Additionally, the value-added agriculture development will encourage further utilization of existing farm and rangeland within Cascade County and the surrounding area”.
- **From the NRCS Custom Soil Report for Cascade County**
 - **BS-Gerber silty clay loam, 0 to 4 percent slopes**
Map Unit Setting
Farmland classification: Farmland of statewide importance

- **88-Gerber-Lawther silty clays, 4 to 8 percent slopes**

Map Unit Setting

Farmland classification: Farmland of statewide importance

- **Soils identified as being “farmland of statewide importance” are found on this property. The goal to “protect the most productive soils” is directly compromised with the addition of this manufacturing site on prime farmland.**
- **This is not in support of Goal 3 Objective A.**

B. Continue to protect soils against erosion.

- **The applicant states “a storm water pollution prevention plan (SWPPP) will be prepared by properly trained and certified personnel, and temporary Best Management Practices (BMPs) will be implemented onsite to minimize erosion during the course of construction and to prevent adverse impacts to receiving waters (i.e. Missouri River).**
- **Please define Best Management Practices to prevent adverse impacts to receiving groundwaters, streams, and rivers.**
- **Recommend the certified personnel for preparing the Storm Water Pollution Prevention Plan (SWPPP) prepare that prior to beginning any construction.**

C. Protect the floodplain from non-agricultural development.

- **The applicant states “The proposed project is located outside of the FEMA flood map boundaries; however, it appears as though the lower portion of Antelope Coulee is included within the 100-year floodplain at its intersection with Sand Coulee Creek (refer to attached excerpt from FIRM panel 30013C0634E). Due to the steep banks of Antelope Coulee within the vicinity of the subject property, it is not anticipated that the floodplain is extensive within the subject property. Work activities will not occur within the active streambed or within the floodplain, and the creek will be protected from non-agricultural development.”**
- **The growth policy Goal 3C clearly states to “protect the floodplain from non-agricultural development”. Not “try to protect”.**
 - **According to the 2014 CCGP, “the Cascade County Floodplain Administrator is responsible for the regulation of said floodplain”.**
 - **We have three Certified Floodplain Managers in the planning office.**
 - **Anna Ehnes generally acts as the primary point of contact for the Conservation District and other agencies.**

D. Support the development of value-added agricultural industry in Cascade County utilizing the products from the regional area.

- The applicant states that “using milk generated by area producers directly supports the development of a value-added agriculture industry.
- According to the MT Milk Study, there is no Class III milk being produced in MT, and class III is what is used for cheese production. That would require out-of-state purchase of milk, which is not supporting area milk producers.

GOAL 4: RETAIN THE PRESENCE OF THE US MILITARY IN CASCADE COUNTY

A. Encourage the federal congressional delegation to actively support maintaining the current mission status at a minimum.

- This goal is not directly relevant to the proposed development.

B. Promote the location of additional military missions in Cascade County.

- This goal is not directly relevant to the proposed development.

D. Refer to the Joint Land Use Study for resolving conflicts and promoting mission compatible development.

- The applicant states he is aware of building placement and height restrictions as defined within the Joint Land Use Study and acknowledges he is prepared to resolve any potential conflicts so as to ensure mission-compatible development. The subject property is located within the Outer Horizontal Surface as detailed within the Joint Land Use Study and therefore vertical obstructions cannot exceed 500 feet tall from the established airfield elevation which should pose no design challenges to the dairy processing facility.
- Supports Goal 4 Objective D

GOAL 5: PRESERVE AND ENHANCE THE RURAL, FRIENDLY AND INDEPENDENT LIFESTYLE THAT IS CURRENTLY ENJOYED BY CASCADE COUNTY’S CITIZENS

A. Maintain Cascade County’s citizens independent lifestyle and minimize local governmental intervention, to the extent possible, consistent with the requirements of a continually evolving economy and constantly changing population.

- Not sure how this proposed development will help maintain Cascade County’s citizens’ independent lifestyle.
- Also, our population appears to be relatively stable and not “constantly changing”.

B. Preserve and promote Cascade County's rich cultural heritage, rooted in natural resource development and reflected in its numerous cultural/historic sites and archaeological areas.

- Cascade County has a rich heritage of prime agricultural crop land and grazing land for livestock. The introduction of manufacturing and industry is in opposition to the county's rich cultural heritage of farming.

C. Promote fire prevention measures throughout the county, giving special emphasis to the extreme fire hazards present at the wild land/urban interface.

- The applicant stated on the SUP 2b that "Fire protection will be provided via onsite storage tanks and booster pumps".
- Please also see "Findings with respect to the analysis criteria" in Part I 2b.
- Recommend the ZBOA require the onsite storage tanks be constructed according to the NFPA standards and inspected and approved by the Sand Coulee Fire Department.

D. Encourage the continued development of educational programs and facilities, recreational opportunities and spaces and health services for all county residents.

- The applicant's response does not adequately support this goal.

Section 10.7 Operations

Operations in connection with the Special Use permits shall not be more objectionable to nearby properties by reason of noise, fumes, vibrations, or flashing lights, than would be the operation of any permitted use.

GOALS THE APPLICANT DISCUSSED	
5 Goals	5/13 = 38%
27 Objectives	27/94 = 28%

THE APPLICANT <u>DID NOT DISCUSS 8 OF THE 13</u> GOALS	62% NOT DISCUSSED
THE APPLICANT <u>DID NOT DISCUSS 67 OF THE 94</u> GOALS	72% NOT DISCUSSED

Goals and concerns not discussed include surface and groundwater quality and sustainability (Goal 8 A-I), impact to wildlife habitat and corridors (Goal 10 A-D), preserving the county's scenic beauty and conserving its forests, rangelands and streams (Goal 2B), preserving the county's open spaces (Goal 2C), preserving the rural, friendly and independent lifestyle (Goal 5 A-D), maintain transportation system that provides safety, efficiency and is cost-effective (Goal 6 A-I), and climate changes (i.e. droughts/floods).

QUESTIONS FOR THE APPLICANT

- 1) Expected quantities in pounds of cheese produced daily, weekly, yearly?
- 2) How many skilled and professional employees will you likely have?
- 3) What green technology are you committing to obtain?

Respectfully submitted,



Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

C.K. Craven
Homeowner

Hopkins, Sandor R.

From: Lori Luoma <loriannluoma@hotmail.com>
Sent: Thursday, June 27, 2019 5:04 PM
To: Planning Comments
Subject: Big sky cheese application

Hello,

I intended to come to the ZBOA meeting but due to the weather I was unable to make it tonight.

I want to voice my opinion regarding the Big Sky Cheese facility application. Although I am not opposed to the cheese facility as a whole, I believe there are better locations already suited for this type of business here in Great Falls. I do not support it's being placed in the location intended for the future slaughterhouse. I am 100% against the slaughterhouse plan and believe the cheese facility is just a way to get a foot in the door for the slaughterhouse. Please, I urge you to consider this issue carefully. Both my husband and I are born and raised Montanans and we will likely leave the community if the slaughterhouse comes to town.

Sincerely,

Lori Luoma

406.788.4824

Loriannluoma@hotmail.com



Date Received: 6-27-19
Date Reviewed: 7-3-19
Complete: Yes No