

CITY OF THOMPSON FALLS

Wastewater System Improvements Environmental Assessment

April 2018

Prepared by:



CITY OF THOMPSON FALLS

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April 2018



**ENVIRONMENTAL ASSESSMENT
CITY OF THOMPSON FALLS WASTEWATER SYSTEM IMPROVEMENTS-PHASE I
THOMPSON FALLS, MONTANA**

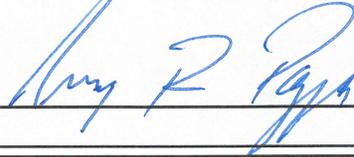
Proposed Action: Phase I of the wastewater improvements includes both expansion of the collection system and improvements to the existing system. Improvements to the existing system include the repair of a manhole within Rock Solid Estates, replacement of approximately 600-feet of 6-inch collection main with new 8-inch PVC main and manholes along S. Jefferson Street and the alley east of S. Jefferson between W. Main Street and Maiden Lane; replacement of 1,300 feet of 12-inch asbestos cement gravity collection main with new 12-inch PVC sewer main and manholes from approximately Pine Street west to the Main Lift Station; rehabilitate of approximately 240 feet of 8-inch clay pipe between Hill Street and Ferry Street with cured-in-place pipe, and new controls and backup power at the Main Lift Station.

The collection system expansion for Phase 1 encompasses an area from US Highway 200 north to the developed edge of the City. The expansion extends from N Wood St. east to Spruce St. Phase 1 will also include connection of the elementary and junior high schools. Wastewater from Phase 1 will generally flow from north to south to Preston Ave. The collection main on Preston Ave will flow to the west to the West Preston Lift Station. The West Preston Lift Station will be located near the intersection of Preston Ave. and N Wood Street. The West Preston Lift Station will convey wastewater to the treatment facility through a new 8-inch PVC force main. The force main will run west along W Preston Ave and Harlow Rd to the facility access road where it will turn north and parallel the road to the lagoon inlet structure. The existing 6-inch AC force main will be replaced with new 6-inch PVC force main from the intersection of Harlow Rd and the facility access south to Lincoln St.

A. Environmental Checklist:

As the Engineer that prepared the preliminary engineering report, I Craig Pozega, PE have reviewed the information presented in this checklist and believe that it accurately identifies the environmental resources in the area and the potential impacts that the project could have on those resources. In addition, the required state and federal agencies were provided with the required information about the project and requested to provide comments on the proposed public facility project. Their comments have been incorporated into and attached to the Preliminary Engineering Report.

Engineer's Signature: _____



ENVIRONMENTAL REVIEW CHECKLIST

NAME OF PROJECT:	City of Thompson Falls Wastewater System Improvements – Phase 1
PROPOSED ACTION:	Expand municipal wastewater collection system
LOCATION:	City of Thompson Falls, Sanders County, Montana

Key Letter:		
N: No Impact; B: Potentially Beneficial; A: Potentially Adverse; P: Approval/Permits Required; M: Mitigation Required		
PHYSICAL ENVIRONMENT		
Key	1	Soil Suitability, Topographic and/or Geologic Constraints (e.g., soil slump, steep slopes, subsidence, seismic activity)
N		<p>NRCS Soil Reports; 2018 Project PER, Chapter 2.</p> <p>Soils in the project area have some limitations for excavations due to rockiness. However, the soils have all generally been disturbed to some degree owing to the area's urbanization.</p>
Key	2	Hazardous Facilities (e.g., power lines, hazardous waste sites, acceptable distance from explosive and flammable hazards including chemical/petrochemical storage tanks, underground fuel storage tanks, and related facilities such as natural gas storage facilities & propane storage tanks)
N		<p>http://www.epa.gov/superfund/national-priorities-list-npl-sites-state#MT; Engineer's Opinion.</p> <p>The City of Thompson Falls is not proximal to any National Priority Sites. None of the locations will have any effect on the existing power lines. Some industrial-level fuel storage facilities lie east of the city, but will not be impacted by the expansion of the wastewater collection system.</p>
Key	3	Effects of Project on Surrounding Air Quality or Any Kind of Effects of Existing Air Quality on Project (e.g., dust, odors, emissions)
N		<p>http://deq.mt.gov/AirQuality/Planning/AirNonAttainmentStatus.mcpx; 2018 Project PER App. F; Engineer's Opinion.</p> <p>The project area lies within the existing Sanders County - Thompson Falls PM-10 nonattainment area for particulates. Some dust may be created during construction, which can be mitigated by the contractor. No long-term effect on air quality is foreseen by the installation of underground wastewater collection lines.</p>
Key	4	Groundwater Resources & Aquifers (e.g., quantity, quality, distribution, depth to groundwater, sole source aquifers)
B		<p>2018 Project PER, Chapter 2; Engineer's Opinion.</p> <p>The project area does not lie within a sole-source aquifer. The replacement of single-residential drainfields will likely benefit the local groundwater resources. While no evidence is available to indicate that the existing situation is significantly harmful to local aquifers, the removal of a potential pollutant source and effective treatment of wastewater is considered beneficial to human and natural environments.</p>

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Key B	5	<p>Surface Water/Water Quality, Quantity & Distribution (e.g., streams, lakes, storm runoff, irrigation systems, canals)</p> <p>2018 Project PER, Chapter 2.</p> <p>Portions of the project construction will take place within 750 feet of the reservoir on the Clark Fork River. Appropriate storm water control will be implemented during construction. No long-term impacts are foreseen regarding surface water by expanding the wastewater collection system except the potential for the elimination of groundwater contaminated by residential drain fields migrating to the river.</p>
Key N	6	<p>Floodplains & Floodplain Management (Identify any floodplains within one mile of the boundary of the project.)</p> <p>2018 Project PER, Chapter 2, App H.</p> <p>The project area does not fall within a FEMA-defined floodway.</p>
Key N	7	<p>Wetlands Protection (Identify any wetlands within one mile of the boundary of the project.)</p> <p>Montana Natural Heritage Program map viewer, 2017, http://mntnhp.org/mapviewer/?t=8; 2018 Project PER, Chapter 2, App G</p> <p>The project area does not host any known or mapped wetlands, according to the Montana Natural Heritage Program, but it is an urbanized area and such habitat would not be expected to occur within the project area. Some small areas of riparian emergent and freshwater emergent wetlands are associated with the banks of the Clark Fork River but will not be impacted.</p>
Key N	8	<p>Agricultural Lands, Production, & Farmland Protection (e.g., grazing, forestry, cropland, prime or unique agricultural lands) (Identify any prime or important farm ground or forest lands within one mile of the boundary of the project.)</p> <p>2018 Project PER, Chapter 2, App F.</p> <p>The project area is classified as farmland of local importance or prime farmland if irrigated. However, the area has been urbanized and consists of primarily single-family residences. Some small-scale gardening may be undertaken in the City, the area is not now used for significant agricultural enterprises. The project will not affect the agricultural status or use of the area.</p>
Key N	9	<p>Vegetation & Wildlife Species & Habitats, including Fish and Sage Grouse (e.g., terrestrial, avian and aquatic life and habitats) (Sage Grouse please visit: https://sagegrouse.mt.gov/)</p> <p>Montana Sage Grouse Habitat Program website.</p> <p>The Montana Natural Heritage Program identifies 32 species of concern for Thompson Falls and an area within a ten-mile radius. Habitat for many of those species does not occur within the City limits. The installation of collection lines in previously-disturbed areas is highly unlikely to present adverse impacts to any of those species. Some urbanized species could potentially be disturbed by noise, but those effects would be temporary. The project falls entirely within the City limits of Thompson Falls, which, by definition, is exempted from registration in or review by the Montana Sage Grouse Habitat Conservation Program.</p>

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Key	10	Unique, Endangered, Fragile, or Limited Environmental Resources, Including Endangered Species (e.g., plants, fish or wildlife)
N		<p>http://www.fws.gov/montanafieldoffice/Endangered_Species/Listed_Species/countylist.pdf; 2018 Project PER, Appendix G.</p> <p>The US Fish & Wildlife service lists two threatened mammals, one fish, and one plant, along with one tree species as a candidate for T&E status. The project area does not host any habitat for any of those species. The area is urbanized and unsuited for the wildlife listed. Whitebark pine may exist within the City limits, however the proposed project will disturb ground primarily along paved streets and commonly-travels alleys that do not host large conifers. If any species or habitat are identified prior to the initiation of construction, the contractor will take steps to minimize disturbances.</p>
Key	11	Unique Natural Features (e.g., geologic features)
N		<p>2018 Project PER, Chapter 2.</p> <p>The City lies on Holocene- and/or Pleistocene-aged alluvial and fluvial deposits proximal to the Clark Fork River. Some of the deposits are related to Lake Missoula and intermittent historical flooding. Neither the existing nor proposed locations for the project will impact the geological features, which are widespread throughout the lower Clark Fork.</p>
Key	12	Access to, and Quality of, Recreational & Wilderness Activities, Public Lands and Waterways, and Public Open Space
N		<p>Engineer's Opinion.</p> <p>The completion of an expanded wastewater collection system does not represent barriers to the use of public lands or recreational opportunities.</p>
HUMAN ENVIRONMENT		
Key	1	Visual Quality – Coherence, Diversity, Compatibility of Use and Scale, Aesthetics
N		<p>Engineer's Opinion</p> <p>The construction of an expanded underground wastewater collection system is unlikely to result in any long-term disruption of visual quality.</p>
Key	2	Nuisances (e.g., glare, fumes)
N		<p>Engineer's Opinion.</p> <p>Some nuisance dust may arise during construction. Contractors will be required to provide the necessary site controls. None of the structures will be the source of long-term, uncontrolled nuisances.</p>
Key	3	Noise -- suitable separation between noise sensitive activities (such as residential areas) and major noise sources (aircraft, highways & railroads)
N		<p>Engineer's Opinion.</p> <p>The completion of the wastewater collection expansion will not result in any noise impacts. Some construction work will result in temporary increases in noise from heavy equipment. The contractor will work within predetermined hours to prevent significant impacts.</p>

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Key	4	Historic Properties, Cultural, and Archaeological Resources
N		<p>2018 Project PER, Chapter 2, App F; SHPO</p> <p>The Montana State Historical Preservation Office found no historical, cultural or archaeological resources at any of the existing container sites or prospective transfer station locations. If evidence of historically important sites is revealed during construction, SHPO will be contacted for guidance.</p>
Key	5	Changes in Demographic (population) Characteristics (e.g., quantity, distribution, density)
N		<p>Engineer's Opinion.</p> <p>None of the project elements will result in any changes in demographic characteristics.</p>
Key	6	General Housing Conditions - Quality, Quantity, Affordability
N		<p>Engineer's Opinion.</p> <p>None of the project elements will result in any changes in housing conditions within the City.</p>
Key	7	Displacement or Relocation of Businesses or Residents
N		<p>Engineer's Opinion.</p> <p>The project will not force or result in the displacement or relocation of any businesses or residents.</p>
Key	8	Public Health and Safety
B		<p>2018 Project PER, Chapter 3.</p> <p>The expansion of the Thompson Falls wastewater collection and treatment system represents a significant improvement to public health by eliminating single-residence wastewater disposal systems. Removing the potential for the failure of individual systems reduces the potential for groundwater contamination and/or exposure of the population to pathogens.</p>
Key	9	Lead Based Paint and/or Asbestos
M		<p>Engineer's Opinion.</p> <p>All elements of the project involve new construction, eliminating the potential for lead-based paint. The project also involves the replacement of asbestos cement pipe. Per federal regulations, the DEQ Asbestos Control Program (ACP) has stated to us that structures such as asbestos cement water piping must have an asbestos inspection by a MT accredited asbestos inspector prior to removal of the AC pipe. If the contractor determines a NESHAP project permit with Montana DEQ is required they will submit an application to DEQ prior to the abatement activities.</p>
Key	10	Local Employment & Income Patterns - Quantity and Distribution of Employment, Economic Impact
B		<p>Engineer's Opinion.</p> <p>The construction of the Thompson Falls wastewater collection expansion will not negatively impact local employment or income patterns in the long run. Local employment may experience an increase during construction, and the improved infrastructure may enhance the business environment of the City.</p>

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Key	11	Local & State Tax Base & Revenues
N		<p>2018 Project PER, Chapter 3.</p> <p>Neither local nor state tax bases nor revenue streams are anticipated to be impacted by the system improvements.</p>
Key	12	Educational Facilities - Schools, Colleges, Universities
N		<p>Engineer's Opinion.</p> <p>No aspects of the Thompson Falls educational system are anticipated to be negatively impacted by the wastewater system improvements.</p>
Key	13	Commercial and Industrial Facilities - Production & Activity, Growth or Decline.
N		<p>Engineer's Opinion.</p> <p>The wastewater system improvements are not likely to negatively impact commercial or industrial facilities.</p>
Key	14	Health Care – Medical Services
N		<p>Engineer's Opinion.</p> <p>Health Care and medical services are unlikely to be impacted by the City's wastewater system improvements.</p>
Key	15	Social Services – Governmental Services (e.g., demand on)
B		<p>Engineer's Opinion.</p> <p>The City's wastewater system improvements will not create any additional demands on social; however, with the addition of 177 households to the treatment system the City's management of the system will be affected. In contract, the project will reduce the County's permitting of septic systems in addition to the number of issues requiring the attention of the County Sanitarian. .</p>
Key	16	Social Structures & Mores (Standards of Social Conduct/Social Conventions)
		<p>Engineer's Opinion.</p> <p>The improvements being considered for the City's wastewater system are unlikely to impact social structures or values.</p>
Key	17	Land Use Compatibility (e.g., growth, land use change, development activity, adjacent land uses and potential conflicts)
N		<p>Engineer's Opinion.</p> <p>The expansion of the collection system and the improvements to the existing collection system are each compatible with existing land use.</p>

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Key	18	Energy Resources - Consumption and Conservation
A		<p>2018 Project PER Chapter 7, Engineer's Opinion.</p> <p>The construction of the new West Preston lift station will increase the City's energy consumption; however, the potentially adverse impact of increased energy consumption is mitigated by the overall environmental benefit the project offers by reducing the potential for contamination of ground water from untreated or partially treated sewage from the substandard septic systems in the Phase 1 project area.</p>
Key	19	Solid Waste Management
N		<p>Engineer's Opinion.</p> <p>The wastewater system improvements will have no impact on how the City manages solid waste.</p>
Key	20	Wastewater Treatment - Sewage System
B		<p>Shawn Sorenson, Sanders County Sanitarian</p> <p>The improvements being considered for the City's represent a significant upgrade of the wastewater system that offers several potential benefits to the environment. Sanders County Sanitarian Shawn Sorenson as stated that "65% of the replacement on-site wastewater systems in the project area use substandard disposal methods and therefore may be contributing to serious environmental contamination." Mr. Sorenson added, "Constructing an affordable central wastewater system is a long-term solution that would resolve acute wastewater issues, promote community growth, prevent environmental contamination, and protect public health." A copy of Mr. Sorenson's letter is included as Exhibit B of this report.</p>
Key	21	Storm Water – Surface Drainage
N		<p>Engineer's Opinion.</p> <p>The wastewater system improvements will not impact storm water or surface drainage.</p>
Key	22	Community Water Supply
N		<p>Engineer's Opinion.</p> <p>The proposed improvements may potentially reduce the threat of contamination of the community's water supply from untreated or partially treated sewage.</p>
Key	23	Public Safety – Police
N		<p>2018 Project PER, Chapter 4.</p> <p>Public safety will be enhanced with proposed project. The proposed improvements will significantly reduce the likelihood of raw sewage being discharged into people's homes, city streets, and in yards. Policing of the community is not expected to be negatively impacted.</p>

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Key	24	Fire Protection – Hazards
N		Engineer's Opinion. Fire protection is not expected to be negatively impacted by the proposed project.
Key	25	Emergency Medical Services
N		Engineer's Opinion. Emergency medical services are not expected to experience any negative impacts from the proposed project.
Key	26	Parks, Playgrounds, & Open Space
N		Engineer's Opinion. The proposed project will have no impact on parks, playgrounds or open space.
Key	27	Cultural Facilities, Cultural Uniqueness & Diversity
N		Engineer's Opinion. The proposed project will have no impact on cultural facilities, cultural uniqueness or diversity.
Key	28	Transportation Networks and Traffic Flow Conflicts (e.g., rail; auto including local traffic; airport runway clear zones - avoidance of incompatible land use in airport runway clear zones)
N		Engineer's Opinion Short-term disruptions during construction may occur. However, the City will require the contractor to provide a traffic management plan prior to construction.
Key	29	Consistency with Local Ordinances, Resolutions, or Plans (e.g., conformance with local comprehensive plans, zoning, or capital improvement plans)
N		Resource Team Assessment Report for Sanders County, November 2015; 2017 Project PER, Appendix A. The proposed wastewater improvements are within the goals and objectives of the Sanders County Resource Team (2015) and represent progress toward achieving those goals. See PER Appendix A.
Key	30	Is There a Regulatory Action on Private Property Rights because of this Project? (consider options that reduce, minimize, or eliminate the regulation of private property rights.)
N		Engineer's Opinion. The project has not resulted in any regulatory actions regarding private property rights.

Environmental Review Form

A detailed response each of the following questions are provided on pages 10 and 11 of this document.

1. **Alternatives:** Describe reasonable alternatives to the project.
2. **Mitigation:** Identify any enforceable measures necessary to reduce any impacts to an insignificant level.
3. **Is an EA or Environmental Impact Statement (EIS) required?** Describe whether an EA or EIS is required and explain in detail why or why not.
4. **Public Involvement:** Describe the process followed to involve the public in the proposed project and its potential environmental impacts. Identify the public meetings -- where and when -
- the project was considered and discussed, and when the applicant approved the final environmental assessment.
5. **Person(s) Responsible for Preparing:** Identify the person(s) responsible for preparation of this checklist.
6. **Other Agencies:** List any state, local, or federal agencies that have over-lapping or additional jurisdiction or environmental review responsibility for the proposed action and the permits, licenses, and other authorizations required; and list any agencies or groups that were contacted or contributed information to this Environmental Assessment (EA).



Mark Sheets, Mayor

April 26, 2018

Date

1. ALTERNATIVES

During the development of the wastewater system preliminary engineering report (PER) Great West Engineering considered the following alternatives for expansion of the Phase 1 collection system.:

Collection System Alternatives

No Action

This alternative would not address the primary concern of the City in that it would not connect the residents of the un-sewered area of the City north of US Highway 200. This would not address the health and sanitary issues discussed in Chapter 4 of the PER. In addition, by not addressing the deficiencies identified within the existing system, operation and maintenance efforts will continue to increase from elevated system I & I and on-going issues with “trouble” pipe. The “No Action” alternative for the collection system is not considered the City’s preferred alternative.

Separate Forcemain to Treatment Site (C1)

This alternative would construct gravity collection main lines within the existing street rights-of-way, and typically located directly underneath the street itself. This is probably the most common system layout in municipalities. The un-sewered area of the City is generally a typical grid street system with alleys running north south between many of the streets. The predominant slope of the area is from north to south. New gravity sewer mains will generally not be installed within alleys in the un-sewered area of the City. Though construction in alleys can reduce restoration costs, it also can be difficult to operate necessary equipment in narrow right-of-way, which can lead to higher construction costs. Additionally, many of the existing alleys within the un-sewered area are unimproved, have private encroachments and have rock outcrops.

Wastewater from the un-sewered area of the City will be collected at a new pump station located on the west end of Preston Avenue. From there, wastewater will be conveyed to the treatment site through a new force main. This alternative is the City’s preferred alternative.

Gravity Collection System to Main Lift Station (C2)

Similar to the separate force main alternative presented previously, this alternative would install gravity collection mains within existing City right-of-way to serve the un-sewered area. This alternative, however, will convey wastewater to the existing Main Lift Station near the intersection of Maiden Lane and Mill Street. In order for wastewater to be conveyed to the existing collection system, the configuration of the collection system expansion will require two new crossings of US Highway 200 and the BNSF railway. From the Main Lift Station wastewater will be pumped to the existing treatment site through a new forcemain to replace the existing aging AC force main. This alternative will require upgrades to the Main Lift Station pumps to convey the additional flow. This alternative is not the City’s preferred alternative.

2. MITIGATION

In January 2018, Great West Engineering prepared a Final Environmental Report for USDA Rural Development (RD). On February 6, 2018, RD’s State Environmental Coordinator Ed Everaert, PE, issued in memo in which he accepted the Report and concurred with the determination that the project warranted a Categorical Exclusion (7 CFR 1970.54 and that “No extraordinary circumstances exist (7 CFR 1970.52). A copy of the Mr. Everaert’s memo is included with Agency Correspondence and Responses in Exhibit A.

Several agencies were invited to comment on the proposed improvements. After considering responses from the agencies and evaluating environmental resources to be impacted, as presented in Chapter 9 of the PER, the environmental checklist was prepared.

No wetlands or prime farmland were identified that will be adversely impacted by the proposed project. No other environmental issues are considered problematic. The State Historic Preservation Office was contacted regarding the project and Damon Murdo responded with the following statement, “As long as there will be no disturbance of alternation of structures over fifty years of age we feel that there is a low likelihood cultural property will be impacted. We, therefore, feel that a recommendation for a cultural resource inventory is

unwarranted at this time.”

All potential impacts of the proposed project are considered insignificant. Measures will be taken during construction to minimize noise, dust, and other nuisances that could result from construction activities.

3. IS ENVIRONMENTAL ASSESSMENT OR ENVIRONMENTAL IMPACT STATEMENT REQUIRED?

As stipulated by the Montana Department of Commerce, to complete the City of Thompson Falls' application for Treasure State Endowment Program (TSEP) grant funding, Great West Engineering prepared a draft Environmental Assessment (EA) of the proposed project that evaluated the potential impact of the project on the environment. The draft EA was advertised and made available for public comment from April 26, 2018 to May 14, 2018. The City conducted a public hearing on Monday, May 14 that also addressed the draft EA. To date, no public comments have been received that would lead to any additional environmental assessment or EIS. None of the project reviews submitted by any of the agencies indicated the necessity for additional environmental review.

4. PUBLIC INVOLVEMENT

The draft EA was prepared and made available to the public beginning April 25, 2018. The City held a public hearing on May 14, 2018 that included a discussion of the EA, along with the proposed scope of work, cost estimate, funding alternatives, and the impact on user rates. The City published a public notice in the Sanders County Ledger on April 25, May 4, and May 11. The City approved the EA at a meeting of the City Council that followed the public hearing on May 14, 2018.

5. PERSON RESPONSIBLE FOR PREPARE ENVIRONMENTAL ASSESSMENT

The wastewater system PER and the environmental assessment were prepared by Craig Pozega, PE of Great West Engineering, Inc.

6. OTHER AGENCIES

The agency with oversight of the proposed wastewater system improvements project is Montana's Department of Environmental Quality (DEQ). Great West Engineering contacted several agencies requesting their comments on the proposed project. The following is a list of the agencies contacted and whether or not they responded:

1. Montana Department of Commerce, Census and Economic Information Center (No Response)
2. Montana Department of Labor and Industry (**Response Received**)
3. Montana Department of Environmental Quality (No Response)
4. Montana Department of Fish, Wildlife, and Parks (No Response)
5. Montana Department of Natural Resources and Conservation (No Response)
6. Montana Department of Transportation (No Response)
7. Montana State Historic Preservation Office (**Response Received**)
8. United States Environmental Protection Agency (No Response)
9. United States Fish and Wildlife Service (No Response)
10. United States Forest Service (No Response)
11. United State Army Corps of Engineers (**Response Received**)
12. Federal Aviation Administration (No Response)
13. Natural Resource and Conservation Service (No Response)
14. Occupational Health and Safety (No Response)
15. United States Department of Transportation Federal Highway Administration (**Response Received**)
16. Sanders County Floodplain Administrator (No Response)

Copies of the letters and the responses from SHPO, USACE, FHWA and the Montana Department of Labor are included in Exhibit A of this report.

EXHIBIT A

AGENCY CORRESPONDENCE



TO: Dan Johnson, Area Specialist, Missoula, Montana
FROM: Ed Everaert, P.E., State Environmental Coordinator
DATE: February 6, 2018
SUBJECT: City of Thompson Falls, Wastewater System Improvements Project

I have reviewed the Final Environmental Report for the City of Thompson Falls, Wastewater System Improvements Project and have made the following determinations:

CONCURRENCE WITH CLASSIFICATION OF PROPOSAL

Categorical Exclusion with an Environmental Report (7 CFR 1970.54).

No extraordinary circumstances exist (7 CFR 1970.52)

ACCEPTANCE OF ENVIRONMENTAL REPORT/ENVIRONMENTAL DOCUMENTATION

The Environmental Report and documentation are acceptable.

ACCEPTANCE OF PRELIMINARY ENGINEERING REPORT/PREFERRED ALTERNATIVE

The Preliminary Engineering Report and Preferred Alternative are acceptable.

PUBLIC NOTIFICATION REQUIREMENTS

No public notices were required for the Categorical Exclusion. Public meetings were held for the PER and Preferred Alternative for the proposed Project.

If there are any questions or concerns, please contact me at richard.everaert@mt.usda.gov or call me at 406-585-2532.

cc: Steve Troendle, Community Programs Director
Karen Sanchez, State Engineer

Rural Development • Montana State Office
2229 Boot Hill Court • Bozeman, MT 59715
Voice (406) 585-2580 • Fax 855-576-2674

USDA is an equal opportunity provider and employer.

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631
www.greatwesteng.com



August 15, 2017

Department of Commerce, Census and Economic Information Center
301 S Park Ave
PO Box 200505
Helena MT 59620

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

We are requesting your review of possible environmental impacts from improvements planned for the City of Thompson Falls wastewater treatment system. A portion of the City is served by a wastewater collection system, with a treatment facility situated northwest of the City. With the help of a variety of funding agencies, the community plans a phased expansion of the collection system. This letter is intended to offer your organization an opportunity to provide input for the proposed expansion.

The upcoming expansion will include the installation of wastewater collection lines within developed areas north of West Main Street (Montana Highway 200). It will serve residential and commercial structures within the City limits. Wastewater will be transferred to the existing treatment facility via new pipelines with the necessary lift stations.

The existing treatment facility has the capacity to handle the proposed increase in wastewater inflow from Phase 1 of the Collection System expansion. Future phases of collection will require Treatment System improvements. The City is looking into advanced lagoon system technologies that will be constructed within the existing treatment plant site.

The disturbances involved with the construction of the proposed wastewater collection system expansion will occur within the urbanized City limits of Thompson Falls. Service lines to residences and businesses will cause localized disturbances of both private and City property. Temporary environmental effects are likely, such as noise, dust, etc. Those can be mitigated with the use of Best Management Practices for construction and contractual conditions/restrictions.

BILLINGS

6780 Trade Center Ave.
Billings, MT 59101
406.652.5000
Fax 406.248.1363

BOISE

3363 N. Lakeharbor Ln
Boise, ID 83703
208.576.6646

MISSOULA

112 W. Front Street
Missoula, MT 59802
406.493.0312



Please take a few moments to review the site and the proposed project. Please provide a written response detailing any comments you may have regarding the project and any potential environmental impacts that should be considered in the project design, avoidance, or mitigation measures.

If you have no comment on this project please check the box below and countersign the bottom of this letter and return to Great West Engineering, Inc. at the address listed above.

Please return your written comments to Steve Lipetzky, Project Engineer, slipetzky@greatwesteng.com or the following address:

Great West Engineering, Inc.
PO Box 4817
Helena, MT 59604

If you need any further information or wish to discuss the project, please contact me at (406) 495-6175.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in blue ink that reads "Steve Lipetzky".

Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The Department of Commerce, Census and Economic Information Center has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

Department of Labor and Industry
1327 Lockett
PO Box 1728
Helena MT 59624

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

We are requesting your review of possible environmental impacts from improvements planned for the City of Thompson Falls wastewater treatment system. A portion of the City is served by a wastewater collection system, with a treatment facility situated northwest of the City. With the help of a variety of funding agencies, the community plans a phased expansion of the collection system. This letter is intended to offer your organization an opportunity to provide input for the proposed expansion.

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BILLINGS

6780 Trade Center Ave.
Billings, MT 59101
406.652.5000
Fax 406.248.1363

BOISE

3363 N. Lakeharbor Ln
Boise, ID 83703
208.576.6646

MISSOULA

112 W. Front Street
Missoula, MT 59802
406.493.0312



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Great West Engineering, Inc.
PO Box 4817
Helena, MT 59604

If you need any further information or wish to discuss the project, please contact me at (406) 495-6175.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in blue ink that reads "Steve Lipetzky".

Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The Department of Labor and Industry has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

Department of Environmental Quality
1520 E. 6th Ave.
PO Box 200901
Helena MT 59620-0901

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

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Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

Department of Fish, Wildlife and Parks
490 North Meridian Road
Kalispell MT 59901

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

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Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

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August 15, 2017

Department of Natural Resources and Conservation
1625 Eleventh Ave
Helena MT 59620-1601

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

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Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
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406.449.8627 ▪ Fax 406.449.8631

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August 15, 2017

Department of Transportation
2701 Prospect Ave
PO Box 201001
Helena MT 59620

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The Department of Transportation has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

State Historic Preservation Office
225 North Roberts
PO Box 201202
Helena MT 59620

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The State Historic Preservation Office has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

US Environmental Protection Agency
Federal Building
10 West 15th Street, Suite 3200
Helena MT 59625

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The US Environmental Protection Agency has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

US Fish and Wildlife Service
585 Shepherd Way
Helena MT 59601

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
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Signature

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Helena, MT 59604
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August 15, 2017

US Forest Service
PO Box 7669
Missoul MT 59807

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
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Attachment: Aerial Vicinity Map & Project Sketch

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Signature

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406.449.8627 ▪ Fax 406.449.8631

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August 15, 2017

US Army Corps of Engineers
10 West 15th Street Suite 2200
Helena MT 59626

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

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Steve Lipetzky, PE
Project Engineer

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Signature

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PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
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August 15, 2017

Federal Aviation Administration
2725 Skyway Drive
Helena MT 59602

Re: Thompson Falls, Montana Wastewater System Improvements

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Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

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Signature

HELENA

PO Box 4817 ■ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ■ Fax 406.449.8631

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August 15, 2017

Natural Resource Conservation Service
7487 Montana Highway 200
Plains MT 59859

Re: Thompson Falls, Montana Wastewater System Improvements

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Please take a few moments to review the site and the proposed project. Please provide a written response detailing any comments you may have regarding the

BILLINGS

6780 Trade Center Ave.
Billings, MT 59101
406.652.5000
Fax 406.248.1363

BOISE

3363 N. Lakeharbor Ln
Boise, ID 83703
208.576.6646

MISSOULA

112 W. Front Street
Missoula, MT 59802
406.493.0312



project and any potential environmental impacts that should be considered in the project design, avoidance, or mitigation measures.

If you have no comment on this project please check the box below and countersign the bottom of this letter and return to Great West Engineering, Inc. at the address listed above.

Please return your written comments to Steve Lipetzky, Project Engineer, slipetzky@greatwesteng.com or the following address:

Great West Engineering, Inc.
PO Box 4817
Helena, MT 59604

If you need any further information or wish to discuss the project, please contact me at (406) 495-6175.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in blue ink that reads "Steve Lipetzky".

Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The Natural Resource Conservation Service has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

Occupational Safety and Health Administration
2900 4th Ave. N
Billings MT 59101

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

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Steve Lipetzky, PE
Project Engineer

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Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

US Department of Transportation
585 Shephard Way
Helena MT 59601

Re: Thompson Falls, Montana Wastewater System Improvements

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A handwritten signature in blue ink that reads "Steve Lipetzky".

Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The US Department of Transportation has reviewed the enclosed proposal and has no comments.

Signature

HELENA

PO Box 4817 ▪ 2501 Belt View Drive
Helena, MT 59604
406.449.8627 ▪ Fax 406.449.8631

www.greatwesteng.com



August 15, 2017

Sanders County Floodplain Administrator
PO Box 519
Thompson Falls MT 59873

Re: Thompson Falls, Montana Wastewater System Improvements

Dear To Whom It May Concern:

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Great West Engineering, Inc.

Steve Lipetzky, PE
Project Engineer

Attachment: Aerial Vicinity Map & Project Sketch

- [] The Sanders County Floodplain Administrator has reviewed the enclosed proposal and has no comments.

Signature

F:\1-16137-Thompson Falls Wastewater PER\CADD_1-16137\Exhibits\PER Exhibits\1-16137-PlanningArea.dwg

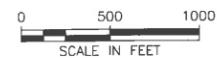
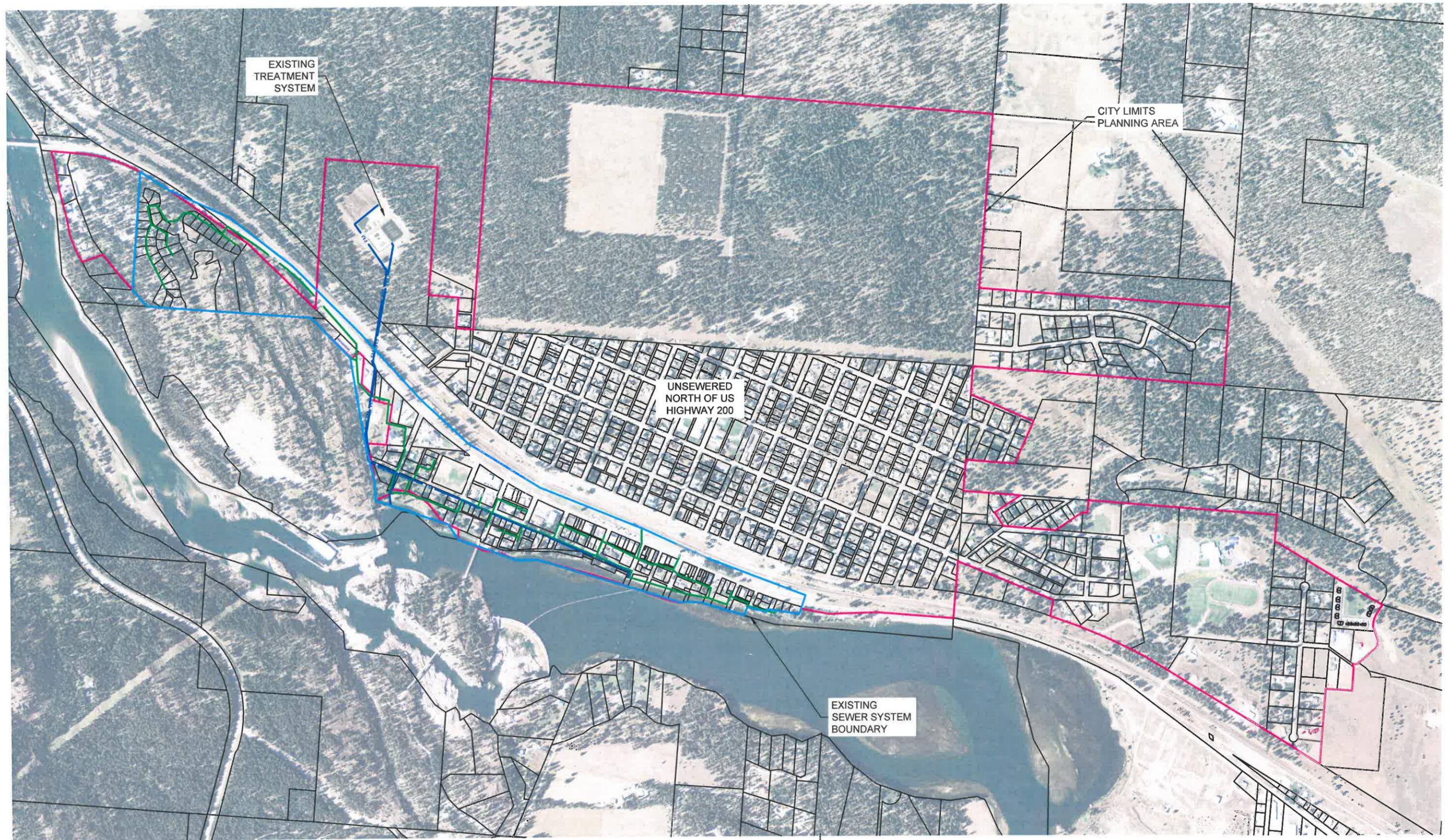


Figure X
City of Thompson Falls
PLANNING AREA

CITY OF THOMPSON FALLS
WASTEWATER TREATMENT SYSTEM PER

From: Murdo, Damon
To: [Steve Lipetzky](#)
Subject: THOMPSON FALLS, WASTEWATER SYSTEM IMPROVEMENTS
Date: Wednesday, August 16, 2017 3:55:23 PM



August 16, 2017

Steve Lipetzky
Great West Engineering
PO Box 4817
Helena MT 59604

RE: THOMPSON FALLS, WASTEWATER SYSTEM IMPROVEMENTS. SHPO Project #: 2017081607

Dear Mr. Lipetzky:

Thank you for your letter regarding the above-cited project. It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, we would recommend that they be recorded and a determination of their eligibility be made.

As long as there will be no disturbance or alteration to structures over fifty years of age we feel that there is a low likelihood cultural properties will be impacted. We, therefore, feel that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials be inadvertently discovered during this project we would ask that our office be contacted and the site investigated.

If you have any further questions or comments, you may contact me at (406) 444-7767 or by e-mail at dmurdo@mt.gov. Thank you for consulting with us.

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office

File: DEQ/AIR WATER WASTE MNG/2017



Montana Department of
LABOR & INDUSTRY

Steve Bullock, Governor
Pam Bucy, Commissioner

Business Standards Division
Todd Younkin, Administrator

September 15, 2017

Steve Lipetzky
Great West Engineering
2501 Belt View Drive
Helena, MT 59604

Re: Wastewater System Improvements, Thompson Falls, Montana

Mr. Lipetzky:

The Building Codes Bureau is in receipt of your letter dated August 15, 2017 requesting that the Department of Labor and Industry provide any comments or helpful information with regards to the wastewater system improvements in Thompson Falls, Montana.

The department has jurisdiction over all building code requirements for Sanders County, and generally projects of this scope do not require plumbing permits for the individual waste water hookups as long there will be no plumbing work performed in the area of 2 feet from the building into the building (the department has permit jurisdiction inside any building out to 2 feet past the building line).

If the project will include any work requiring installation of electrical, mechanical or plumbing installations or the building of any vertical structures to compliment the waste water system work (pump station buildings, treatment plants, etc.) those permits will be required by the department. The project description does not appear to include a new lift station structure or improvements to the existing lift station; this work would require a building permit. As you progress further with your designs, you may contact the department again to determine the applicability of permits for this project.

Thank you for the project notification and if you have any questions please feel free to contact me at the email and number below.

Thank you,

Carrie E. Baker
Program Manager
Building Codes Bureau
Department of Labor and Industry
State of Montana
cbaker@mt.gov
406-841-2016

RECEIVED

SEP 18 2017

Great West



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
HELENA REGULATORY OFFICE
10 WEST 15TH STREET, SUITE 2200
HELENA, MONTANA 59626

September 5, 2017

Regulatory Branch
Montana State Program
Corps No. **NWO-1996-90336-MTH**

Subject: Thompson Falls – Wastewater System Improvements

Steve Ipestzky
Great West Engineering Inc.
PO Box 4817
Helena, Montana 59604-04817

Dear Mr. Ipestzky:

We are responding to your request for comments regarding the above-referenced project. Specifically, you are proposing to expand the city's existing wastewater collection lines within developed areas north of West Main Street. The project is located near Clark Fork River, Latitude 47.597501°, Longitude -115.344797°, within Section 9, Township 21 N, Range 29 W, Sanders County, Montana.

The mission of the U.S. Army Corps of Engineers (Corps) Regulatory Program is to protect the Nation's aquatic resources while allowing reasonable development through fair, flexible and balanced permit decisions. In particular, under Section 404 of the Clean Water Act, we work to protect the biological, physical, and chemical integrity of the Nation's aquatic resources. Projects are evaluated on a case-by-case basis to determine the potential benefits and detriments that may occur as a result of the proposal. In all cases an applicant must avoid and minimize impacts to aquatic resources to the greatest extent practicable.

Under the authority of Section 404 of the Clean Water Act (CWA), DA permits are required for the discharge of fill material into waters of the U.S. Waters of the U.S. include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. Isolated waters and wetlands, as well as man-made channels, may be waters of the U.S. in certain circumstances, which must be determined on a case-by-case basis.

Based on the information provided in your submittal, we are unable to ascertain if regulated activities are proposed or if jurisdictional waters of the U.S. are present within the project area. If your final design includes the placement of fill material in any jurisdictional area described above, or otherwise requires authorization by a DA permit, please submit a Montana Joint Permit Application to this office prior to starting any work. After a review of the materials submitted we will determine what type of permit, if any, will be required. You can obtain a Montana Joint Permit Application Form at the following address:

<http://www.dnrc.mt.gov/licenses-and-permits/stream-permitting>. A list of requirements for a complete Nationwide Permit application can be obtained at the following address:
<http://www.nwo.usace.army.mil/Media/Fact-Sheets/Fact-Sheet-Article-View/Article/487708/pre->

construction-notification/ If you do not have internet access please contact our office at the address below to obtain more information.

If a Section 404 permit is required for this project then there are several issues that the applicant should be aware of for this specific project. Upon initial review, this office has identified the project location to be within bull trout (*Salvelinus confluentus*) critical habitat. As part of the review process this office must evaluate any potential impacts to threatened or endangered species as detailed in Section 7 of the Endangered Species Act. To complete this review process it may be necessary for this office to submit received applications to the U.S. Fish and Wildlife Service for consultation on the potential impacts to threatened and endangered species. There are also several identified historic properties within the project boundaries that may require consultation with the State Historic Preservation Officer for this specific project. You are encouraged to consider these factor when designing your proposed project design and to be aware that this consultation could lengthen the time line to process any potential verification letters from this office. Submitting your application well in advance of the desired project initiation date is advisable.

Note that this letter is not a DA authorization to proceed. It only informs you of your need to obtain a DA permit if waters of the U.S. will be affected. If waters of the U.S. will not be affected by a jurisdictional activity a DA permit will not be required for the project.

Please refer to identification number NWO-1996-90336 in any correspondence concerning this project. If you have any questions, please contact Dylan Hickey by email at Dylan.J.Hickey@usace.army.mil, or telephone at (406) 441-1364.

Sincerely,

HICKEY.DYLAN.JER
EMIAH.1535865112

Digitally signed by
HICKEY.DYLAN.JEREMIAH.1535865112
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USA, cn=HICKEY.DYLAN.JEREMIAH.1535865112
Date: 2017.09.05 14:18:55 -06'00'

Dylan Hickey
Regulatory Project Manager

From: Bruner, Heidi (FHWA)
To: [Steve Lipetzky](#)
Cc: [Skinner, Jim \(jskinner@mt.gov\)](mailto:jskinner@mt.gov)
Subject: City of Thompson Falls Wastewater System Improvements - August 15, 2017 Correspondence
Date: Tuesday, August 22, 2017 12:32:13 PM

Dear Mr. Lipetzky,

Thank you for your August 15, 2017 letter, which notified us of the City of Thompson Falls proposed wastewater system improvements. The Federal Highway Administration appreciates the opportunity to review the proposed project and offer comment.

After reviewing the proposal and the defined boundaries of the project, it appears that the proposed project could impact highway infrastructure or right of way of Highway 200. If that is currently the case or if the project proposal evolves to include impacts to state transportation infrastructure, please coordinate your efforts with the Montana Department of Transportation (MDT), as appropriate.

To facilitate that coordination, I have copied Jim Skinner, Chief of the MDT Policy, Program & Performance Analysis Bureau. That MDT Bureau coordinates the Systems Impact Analysis Process (SIAP) reviews facilities impacting state roadways and non-MDT-initiated environmental review processes.

Thank you again for the opportunity to provide comment on this proposed project. Please contact me at (406) 441-3914 or Heidy.Bruner@dot.gov, if you wish to discuss my comments or if you have additional questions or concerns.

Kindly,
Heidy Bruner, P.E.
Federal Highway Administration – Montana Division
406.441.3914

EXHIBIT B

SANDERS COUNTY SANITARIAN'S LETTER OF SUPPORT FOR PROPOSED PROJECT



SANDERS COUNTY

ENVIRONMENTAL HEALTH

April 12, 2018

To Whom It May Concern:

Thompson Falls residents and wastewater regulators face increasingly difficult choices for continued on-site wastewater disposal. This letter is therefore written in support of the Thompson Falls community wastewater project, emphasizing the need to address the extensive unsewered portion north of US Highway 200 (The Hill).

Thompson Falls has an unsewered population estimated at 1,155 individuals and around 593 structures. Of the 593 unsewered structures, approximately 551 are residential living units and the remainder are various commercial buildings.

The Thompson Falls Townsite was platted on or before 1893, with multiple additions occurring throughout the early 1990's. Most lots were, and remain, approximately 28 to 31 feet wide and about 140 feet long. Owners, whether residential or commercial, must occupy multiple lots to accommodate structures and utilities.

The City of Thompson Falls defers wastewater services for unsewered parcels to Sanders County, per Thompson Falls Ordinance Title 9 Water and Sewer, 9-2-3 Private Wastewater Disposal. County permitting started in 1995 and approximately 205 on-site wastewater treatment system permits, including 43 new and 162 replacement on-site systems, have been issued.

Sanders County sanitarians have, for decades, expressed frustration and concern for continued use of on-site wastewater systems on the Thompson Falls Hill. Natural geologic and topographic conditions, combined with overdevelopment create significant barriers to any sewer system and present exceptional difficulty installing on-site wastewater systems. Examples of unpredictable natural barriers include deep and massive clay soils, shallow soils overlaying boulders and bedrock outcroppings, and steep slopes. Human occupancy has intensified these problems by fully developing parcels and leaving inadequate space for replacement of failed drainfields.

Historic wastewater disposal was typically a cesspool that collected sewer wastes, settled the solids, and discharged liquid effluent through infiltration. Some cesspools had effluent pipes capable of discharging liquid and semi-solid effluent to dry wells or rock and soil fractures leading to underground cavities reported and observed throughout The Hill. Gray water was either discharged into the cesspool or directly into the ground. Many original hand-stacked cesspool systems, and other archaic systems, are still in operation.

Early replacement included metal septic tanks that provided solids settling and directed liquid effluent directly into the ground, into a dry well, or back into the hand-stacked cesspools. The highly corrosive environment caused metal tanks to quickly rust and fail and only temporarily resolved the problem. Metal tanks are frequently encountered with rotted plywood covering their rusted top, an obvious attempt at prolonging the use of a failed tank, only to create a serious safety hazard.

At present, 106 of 162 (65%) of replacement on-site wastewater systems on the Thompson Falls Hill use substandard disposal methods and may therefore be contributing to serious environmental contamination. Substandard systems are incapable of reducing nutrients (nitrate, nitrite, and phosphate) and pathogens to safe levels prior to interface with Montana's high quality waters. With only 205 total permits issued for 593 wastewater producing structures, an additional 388 replacements are expected in the coming years. This means approximately 252 substandard systems will be installed in the coming years. Replacing failed wastewater systems with substandard on-site systems is not a responsible practice.

Current wastewater issues are a barrier to residential and commercial growth. Owners and potential buyers are cautioned that wastewater treatment for new development and replacement of existing infrastructure is determined on a case-by-case basis. They are told space for proper wastewater treatment and disposal is limited and Sanders County therefore cannot guarantee a system can be permitted and installed.

Sanders County staff and Thompson Falls residents are struggling with this situation. Constructing an affordable central wastewater system is a long term solution that would resolve acute wastewater issues, promote community growth, prevent environmental contamination, and protect public health.

Please accept this letter of support for the Thompson Falls community wastewater project.

Sincerely,

Shawn Sorenson, RS
County Sanitarian