FINAL ENVIRONMENTAL ASSESSMENT

April 28, 2025

Water Quality Division
Montana Department of Environmental Quality

PROJECT/SITE NAME:	**Lakeside County Water & Sewer District Lift Station, Septic Receiving Headworks, Connecting Force Main, and Rapid Infiltration System**
APPLICANT/COMPANY NAME: Lakeside County Water & Sewer District	
PROPOSED PERMIT NUMBER: MTX000307 (Montana Ground Water Pollution Control System)	
LOCATION: Township 27N, Range 21W, Section 11N Latitude: 48.1127610° Longitude: -114.225111°	**COUNTY: Flathead**
PROPERTY OWNERSHIP: FEDERAL ____ STATE ____ PRIVATE __X__	

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1. OVERVIEW OF PROPOSED ACTION

1.1. AUTHORIZING ACTION

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human environment. The Proposed Action, described in **Section 1.3** below, is considered a state action that may have an impact on the human environment and, therefore, the Department of Environmental Quality (DEQ) has prepared an environmental review. This Environmental Assessment (EA) examines the proposed action and alternatives to the proposed action and discloses potential impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

1.2. DESCRIPTION OF DEQ REGULATORY OVERSIGHT

1.2.a. Montana Water Quality Act

DEQ administers the Montana Water Quality Act, issuing Montana Ground Water Pollutant Control System (MGWPCS) discharge permits pursuant to Title 75, Chapter 5, part 4, Montana Code Annotated (MCA). Regulations governing MGWPCS permitting are codified at Administrative Rules of Montana (ARM) Title 17, Chapter 30, Sub-chapter 10.

1.2.b. Montana Public Water Supply Act

DEQ implements the Public Water Supply Act, reviewing public water and wastewater systems pursuant to Section 75-6-101, et. seq., MCA. Rules authorized by the act are adopted in ARM Title 17, Chapter 38, Sub-chapter 1. Circular DEQ-2: Design Standards for Public Sewage Systems is adopted and incorporated by reference into ARM 17-38-101 (22).

1.3. PROPOSED ACTION

Lakeside County Water & Sewer District (LCWSD) applied for a new MGWPCS permit. More specifically, LCWSD requests a MGWPCS permit for a proposed Rapid Infiltration System to discharge treated domestic wastewater to ground water. The facility will be located on private land near Somers, Flathead County, Montana.

LCWSD has also submitted engineering plans to DEQ's Engineering Bureau for a new septage receiving facility, a new headworks (screening and grit removal), a new buried force main connecting the headworks to the receiving facility, and a replacement lift station. These elements will also be located on private land near Somers, Montana.

This project does not include the planned treatment plant improvements. The improvements proposed in the current project will support the advanced treatment facility that will be conducted in a future phase. LCWSD determined that an advanced biological treatment facility is the best solution, but design review and construction of this element will constitute a separate Phase 2. The LCWSD facility will not accept septage at the receiving facility until after completion of Phase 2.

All information included in this EA is derived from the MGWPCS permit application, the engineering plans, discussions with the applicant, analysis of aerial photography, topographic maps, and other research

tools. See the MGWPCS Fact Sheet (MT DEQ, 2025) and references cited in **Section 7** for more information.

Table 1. Summary of Proposed Action

Proposed Action	
General Overview	The proposed action is to issue a new individual MGWPCS permit and authorize construction of the headworks, lift station, and receiving facility. The permit contains effluent limitations, special conditions, best management practices, wastewater monitoring and reporting, and ground water monitoring and reporting requirements. The permit is issued under the authority of the Montana Water Quality Act. Design, construction, operation, and maintenance of the septage receiving facility, headworks, and lift station is regulated by DEQ's Engineering Bureau. and are approved under the authority of the Montana Public Water Supply Act. The planned phase 2 of LCWSD improvements: design, construction, operation, and maintenance of the wastewater treatment plant and rapid infiltration basin is also regulated by DEQ's Engineering Bureau, but not included in this action. The MGWPCS permitting action will regulate the discharge of pollutants to ground water by imposing effluent limitations and special conditions including requirements for monitoring effluent and ground water quality for the five-year permit duration. See the Permit for the legally binding requirements and the Fact Sheet for the technical rationale behind permitting decisions. The engineering review action is to authorize the construction of phase 1 of the LCWSD's planned improvements: replacement lift station, new headworks, and a new buried force main connecting to a new septage receiving facility.
Personnel Onsite	**Operation:** One operator for effluent and ground water sampling. One full-time operator will be present at the septage receiving facility, and one full-time operator will be present at the LCWSD treatment facility.
Location and Analysis Area	***Location:*** 235 Bierney Creek Road, Lakeside, MT 59922 Latitude: 48.1127610° Longitude: -114.225111° ***Analysis Area:*** The area being analyzed as part of this environmental review includes the immediate project area (Figure 1), as well as neighboring lands surrounding the analysis area, as reasonably appropriate for the impacts being considered.
The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.	
Air Quality	No air quality regulations apply for issuance of the MGWPCS permit.
Water Quality	The applicant proposes to obtain and maintain new MGWPCS permit coverage and comply with requirements for discharge to state waters.

Erosion Control and Sediment Transport	Erosion control and sediment transport regulations do not apply to a domestic wastewater treatment plant. Applicable construction stormwater regulations and permits are discussed below in **Section 5**.
Solid Waste	No solid waste regulations apply for issuance of the MGWPCS permit.
Cultural Resources	DEQ consulted the Montana Cultural Resource Database on 9/19/2024. No historical sites present in project area. The permitting action will not affect cultural resources.
Hazardous Substances	Hazardous waste disposal is not allowed under the MGWPCS permit.

Cumulative Impact Considerations	
Past Actions	Within the analysis area, there were water treatment lagoons previously approved by DEQ's SRF program. Nearby properties have septic systems regulated by Flathead County. The ambient nitrate concentration in the shallow receiving aquifer measured by the permittee during the application process was 0.11 mg/L (milligrams per liter, or parts per million).
Present Actions	The permitting action will regulate the discharge to Class I ground water of domestic-strength wastewater treated to permit requirements.
Related Future Actions	There are no other applications under consideration for the analysis area. Future actions within the analysis area must meet the minimum set back requirements per DEQ's Public Water, Subdivision, and State Revolving Fund programs.

1.4. PURPOSE, NEED, AND BENEFITS

The purpose of the proposed action is to issue a MGWPCS permit to regulate the discharge of treated wastewater to ground water. and to construct a new septage receiving facility, a new headworks, a replacement lift station #10, and a buried force main connecting the receiving and treatment facilities.

The LCWSD serves the Lakeside census designated place (CDP) along the northwestern shores of Flathead Lake. In 1994, the community of Somers entered into an interlocal agreement with the LCWSD, whereby LCSWD would collect, treat, and dispose of wastewater from Somers. This northwestern corner of Flathead Lake has historically been a popular summer recreation destination. Recent development in the area, and shifts from vacation homes to year-round residences, have resulted in increased flows to the LCWSD wastewater treatment facility (WWTF). This growth within the LCWSD, detailed in a 2019 Preliminary Engineering Report (PER) and 2021 American Rescue Plan Act (ARPA) Infrastructure Grant Application, has led LCWSD to consider facility upgrades since the existing WWTF is not sized to accommodate already committed and anticipated future connections. The LCWSD's current WWTF, originally constructed in 1988 and updated in 1994, is generally in good working order. The existing lagoon system does not discharge to state waters and operates without a DEQ-issued wastewater discharge permit by storing treated wastewater during the winter months and employing irrigation reuse (land application) during the agricultural season. The current capacity in the facility's storage lagoon and irrigation site has limited the ability of LCWSD to accommodate increased wastewater flows or accept new connections.

The existing Lift Station #10 was constructed in 1988 and has had minimal upgrades. The need for replacement was identified in the 2021 infrastructure grant application for funding by the ARPA Program. This lift station collects wastewater from Lift Station #8 and Lift Station #9, and it is located to the southeast of the Lakeside CDP along the shores of Flathead Lake. The existing pumps, controls, valves, and discharge piping are at the end of their useful design life, thereby increasing the risk of failure. Failures at this lift station could allow untreated wastewater to overflow and discharge directly into Flathead Lake. It is recommended that the pumps, controls, valves, and discharge piping be replaced and updated to reduce the risk of sanitary sewer overflows (SSOs).

According to the Flathead County Environmental Health Department, there are over 24,000 permitted onsite subsurface wastewater treatment systems (SWTSs) within the county. Conventional SWTSs function with a septic tank where solids settle, and biological treatment occurs. Regular maintenance of SWTSs includes periodically pumping out solids (septage) from septic tanks to maintain proper system operation. Traditionally in Flathead County, pumped septage has been disposed of at a community wastewater treatment facility or by land application at sites permitted by the Montana DEQ. Significant rural development within the county, increase in the number of SWTSs, stringent discharge limits, and reduced availability of permitted disposal sites have resulted in the need for more and better disposal options. Concurrent with the LCWSD's evaluation of treatment facility upgrades, Flathead County contracted with an engineering firm to perform an alternatives analysis for treatment and disposal of septage collected throughout the county. The county's recommended alternative from that analysis was to construct a facility that would accept and treat septage. In 2023, Flathead County signed an interlocal agreement with the LCWSD stating that the LCWSD would accept, treat, and dispose of treated effluent from the planned septage treatment facility. Revised cost estimates in 2024 for the separate septage treatment facility exceeded the county's available project budget. As a result, acceptance of septage directly at the LCWSD WWTP was considered.

The applicant's purpose and need, as expressed to DEQ in seeking this action, is to address growing wastewater collection, treatment, and disposal needs, and discharge treated wastewater from a subsurface discharge structure (Outfall 001) into Class I ground water. The MGWPCS permit will include effluent limitations, conditions, and monitoring requirements to ensure compliance with water quality standards and protect beneficial uses.

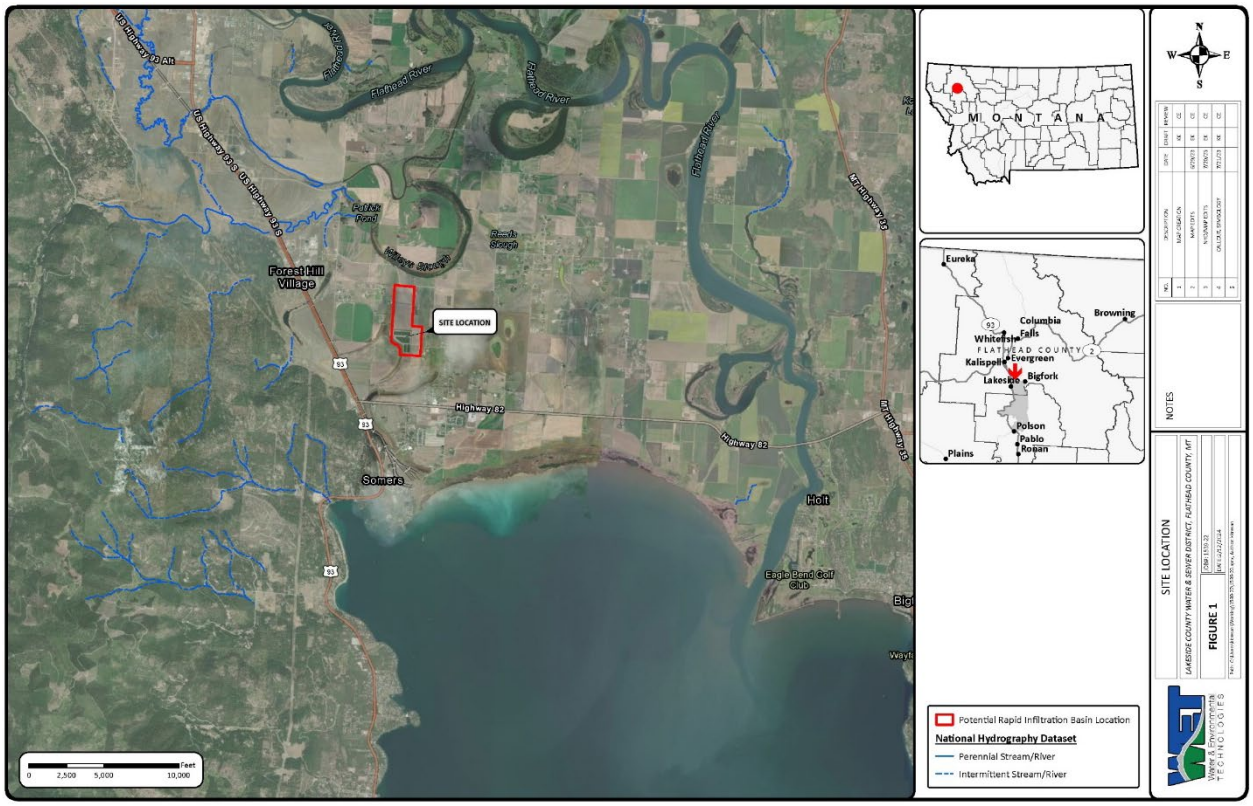

Figure 1. General Location of the Proposed Project

1.5. OTHER GOVERNMENTAL AGENCIES AND PROGRAMS WITH JURISDICTION

The proposed action is located on private land. All applicable local, state, and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: Montana Department of Natural Resources, Montana Department of Fish Wildlife and Parks, U.S. Fish and Wildlife Service, U.S Army Corps of Engineers, and Flathead County.

2. EVALUATION OF AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE

The impact analysis will identify and evaluate direct, secondary, and cumulative impacts to the physical environment and human population in the area to be affected by the proposed project. *Direct impacts* occur at the same time and place as the action that causes the impact. *Secondary impacts* are a further impact to the human environment that may be stimulated, induced by, or otherwise result from a direct impact of the action. (ARM 17.4.603(18)) Where impacts would occur, the impacts will be described in this analysis.

Cumulative impacts are "the collective impacts on the human environment within the borders of Montana of the proposed action when considered in conjunction with other past, present, and future actions related to the *p*roposed *a*ction by location *or* generic type. Section 75-1-220(4), MCA. "Related future actions must also be considered when these actions are under concurrent consideration by any state

agency through preimpact statement studies, separate impact statement evaluation, or permit processing procedures. ARM 17.4.603(7). The projects identified in Table 1 were analyzed as part of the cumulative impacts assessment for each resource.

The intensity of the impacts is measured using the following:

- **No impact**: There would be no change from current conditions.
- **Negligible**: An adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor**: The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate**: The effect would be easily identifiable and would change the function or integrity of the resource.
- **Major**: The effect would alter the resource.

2.1. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE

Are soils present which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?

Water Environmental Technologies, Inc. ("WET") performed a geotechnical investigation for the project site on September 6-8, 2022, and found that the proposed facility site will be located on poorly graded silty sand deposits typical of the deltaic deposits left from the Flathead River flowing into Flathead Lake. See the application provided by the permittee (DEQ, 2024) for more information regarding site soils and geology. Prior to construction, DEQ Engineering Bureau will review soil data to determine that proper infiltration from the infiltration gallery is met under the Public Water Supply Act. That determination will be separately evaluated as part of the phase 2 planned treatment plant improvements.

Direct Impacts

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS (Montana Ground Water Pollution Control System) permit action (DEQ, 2024). Soil moisture directly under the rapid infiltration system will increase as a result of the treated effluent infiltrating into the subsurface. **Minor impact**.

Secondary Impacts

Secondary impacts to geology and soil quality, stability and moisture are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to geology and soil quality, stability and moisture are not expected with this permitting action. **No impact**.

2.2. WATER QUALITY, QUANTITY, AND DISTRIBUTION

Are any surface or groundwater resources present in the analysis area? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels or degradation of

water quality?

Direct Impacts

See the MGWPCS Fact Sheet (DEQ, 2024) for information regarding the receiving water classification, beneficial uses, water quality standards, nondegradation, and water quality based effluent limit development.

In order to maintain beneficial uses of the aquifer, DEQ performed an analysis of the potential impacts this project may have on the receiving aquifer. The resulting projections indicate that the nitrate levels downgradient of the drainfield should meet water quality standards and that all beneficial uses will be maintained.

The facility covered under this permit is required to operate and maintain treatment capable of meeting the established effluent limitations and permit conditions, which are derived from the most restrictive ground water quality standards and significance criteria. The effluent limitations, along with special conditions and standard conditions of the permit are developed to maintain the beneficial uses of all state ground waters including drinking water. Facilities must be able to meet the restrictive effluent limitations prior to discharge.

A ground water monitoring network was established in 2023 as part of the Permittee's requirement to study site-specific hydrogeology at the facility. This network will be maintained to provide ongoing monitoring of the condition of the aquifer as part of the MGWPCS permit. All reported data is available to the public. DEQ and the public will therefore be able to confirm that the direct impacts of this activity are as anticipated by this assessment.

Drinking water wells are screened in a deeper aquifer than where the effluent will discharge to and are expected to be unaffected by this discharge.

All discharge disposal structures must meet the minimum set back requirements which includes surface water, flood plains, ditches and springs.

Construction activities may temporarily impact water quality by contributing discharges of sediment to surface waters. If the construction related disturbance exceeds one acre, the permittee will be required to obtain permit coverage under a Montana Pollutant Discharge Elimination System (MPDES) General Permit for Storm Water Discharges Associated with Construction Activity; and develop and implement a Storm Water Pollution Prevention Plan (SWPPP).

No significant impacts to state waters were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). **Minor impact**.

Secondary Impacts

The wastewater discharge authorized by this permitting action may elevate pollutant levels above previous ambient conditions. The facility must operate within the bounds of their MGWPCS permit. No significant direct or secondary impacts are expected to occur. If the facility does not comply with the terms and conditions of the permit, DEQ has enforcement

authority to ensure a return to compliance.

See the Fact Sheet (DEQ, 2024) for information regarding the receiving water classification, beneficial uses, water quality standards, nondegradation, and water quality based effluent limit development.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). **Negligible impact.**

Cumulative Impacts

DEQ considered cumulative environmental impacts of the construction and operation of the facility and found no significant adverse effects on water quality, the human environment, or the physical environment. The DEQ analysis included the cumulative impact from other past and present actions.

All major discharge permitting actions, including the current action and any future actions, will include any substantive information derived from public input relating to potential impacts on the human environment and on water quality. All future actions related to this current action will be addressed by DEQ through additional discharge permitting process procedures. Any actions that are outside the purview of the discharge permit may not be addressed by DEQ until the next permitting action takes place.

To protect beneficial uses, there shall be no increase of a pollutant to a level that renders the waters harmful, detrimental, or injurious. Therefore, no wastewaters may be discharged such that the wastewater either alone or in combination with other wastes will violate or can reasonably be expected to violate any standard.

The allowable discharge is derived from a mass-balance equation that considers the assimilative capacity of the receiving aquifer. This analysis factors in the cumulative impacts of all existing upgradient discharges in the receiving aquifer.

Testing of the aquifer was completed to determine the existing impacts of all upgradient discharge sources. The resulting ambient nitrogen levels were used to determine the assimilative capacity to ensure limitations were achieved that factor in these existing upgradient sources.

A ground water monitoring network has been established that will provide for long-term monitoring of the aquifer. The monitoring and data reporting will provide for continual oversight of the health of the aquifer including the impacts of any upgradient dischargers. The data will also be used to update permit conditions and cumulative effect analyses for all future major modifications or renewal of this permitting action. These actions will be made available to the public for comment. Continued monitoring and compliance with the effluent limitations and conditions in the Permit are expected to maintain nitrate levels downgradient at levels that meet water quality standards and protect beneficial uses.

Long-term monitoring and reporting, continual analysis, maintenance of permit conditions,

and public notice and comment is a benefit to having a system that is covered under a MGWPCS permit.

Nearby surface waters include Ashley Creek and Flathead Lake. DEQ has identified impairments to the aquatic life beneficial use in both surface waters and identified total nitrogen as a probable cause in each case. The new facility represents a new source of total nitrogen in this location. However, the wastewater and septage to be received and treated by the new facility is wastewater that already exists in the Flathead Lake watershed and is currently treated to much lower standards. This project therefore results in a net reduction of total nitrogen discharged in the greater watershed.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). **No impact**.

2.3. AIR QUALITY

Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?

Direct Impacts

Impacts on air quality resulting from this permitting action would be short-term during construction activities. These short-term impacts are expected to be negligible. These short-term negative impacts on air quality are expected from heavy equipment in the form of dust and exhaust fumes. Proper construction practices will minimize this problem with the project specifications requiring dust control.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS (Montana Ground Water Pollution Control System) permit action (DEQ, 2024). **No impact**.

Secondary Impacts

Operation of the septage receiving and headworks facilities have the potential to generate odors that could be offensive. These facilities will be constructed within buildings with all discharged air passing through a soil media bed designed for odor control. The existing facility uses passive ventilation to vent gasses for operator safety and corrosion prevention, but without any provision for odor control. The proposed headworks facility will be an improvement to air quality compared to the existing open-air headworks screen at the LCWSD lagoons. **Negligible impact**.

Cumulative Impacts

Cumulative impacts to air quality are not expected with this permitting action. **No impact**.

2.4. VEGETATION COVER, QUANTITY, AND QUALITY

Will any vegetative communities be significantly impacted? Are any rare plants or cover types of present?

Based on a search of the Natural Heritage Database, there are no plant species listed as either S1 (at high risk), S2 (at risk), LE (listed endangered), or LT (listed threatened) within the immediate vicinity of the proposed facility. (http://fieldguide.mt.gov/statusCodes.aspx#msrc:rank).

There is only one species of concern within a one-mile radius of the proposed facility: Columbia water-meal (*Wolffia columbiana*).

Direct Impacts

The facility will be built on lands previously disturbed by agriculture and municipal wastewater disposal. The septage receiving facility will be constructed to the southwest of LCWSD's existing effluent reuse irrigation pivot. The area is currently outside of the irrigation pivot's reach and not used for agricultural purposes. The new headworks facility will be constructed near the southeast corner of LCWSD's existing aerated treatment lagoons. The area is currently used for agricultural purposes. The NRCS Soil Survey lists the area as "not prime farmland". Construction of the facility will result in a loss of approximately 4 acres of field. The force main between the septage receiving and headworks facility will be buried primarily beneath LCWSD's irrigation pivot and mapped floodplain. Temporary disturbance along the force main alignment will occur during construction. No long-term change of land use or farmland will occur because of the force main installation. No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). **Moderate impact**.

Secondary Impacts

Secondary impacts to vegetation cover, quantity, and quality are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to vegetation cover, quantity, and quality are not expected with this permitting action. **No impact**.

2.5. TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS

Is there substantial use of the area by important wildlife, birds, or fish? Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern? Impacts related to the Montana Sage Grouse Executive Order?

The land has been used historically for agricultural practices so no significant impacts on terrestrial, avian and aquatic life and habitats are expected.

Based on a search of the Natural Heritage Database, there are no animal species listed as either S1 (at high risk), S2 (at risk), LE (listed endangered), or LT (listed threatened) in the immediate vicinity of the proposed facility unless otherwise stated
(http://fieldguide.mt.gov/statusCodes.aspx#msrc:rank).

There are two mammal species of concern: fisher (*Pekania pennanti*) and grizzly bear (Ursus arctos). Grizzly bear is listed as threatened. There is one invertebrate species of concern: oblique ambersnail

(*Oxyloma nuttallianum*). There are eight avian species of concern: American bittern (*Botaurus lentiginosus*), bobolink (*Dolichonyx oryzivorus*), Brewer's sparrow (*Spizella breweri*), Cassin's finch (*Haemorhous cassinii*), great blue heron (*Ardea herodias*), pileated woodpecker (*Dryocopus pileatus*), trumpeter swan (*Cygnus buccinator*), and veery (*Catharus fuscescens*).

The project site is not listed as being located within sage grouse habitat. DEQ referred to the Habitat and Occurrence mapping program at https://sagegrouse.mt.gov/projects/. If there are questions about Sage Grouse at this site, the applicant must contact and consult with the Sage Grouse Habitat Conservation Program at: https://sagegrouse.mt.gov/.

Direct Impacts

The facility will be built on previously disturbed lands. No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024).

The existing treatment facility, proposed septic receiving facility, proposed headworks facility, and Lift Station #10 are outside of the 100-year floodplain. The proposed force main between the septage receiving facility and the headworks facility will cross a 100-year flood plain. The force main in the area of the flood plain will be installed with horizontal directional drilling equipment. This allows the installation of the pipe below ground without requiring heavy equipment access, temporary soil stockpiles, or disturbing surface vegetation. Permanent structures and buildings, including the septage receiving and headworks facility will be located outside of mapped floodplains and wetlands. The Department of Natural Resources (DNRC) has indicated that a flood plain permit will be required for the work. DNRC's comments are summarized below in **Section 4**.

Based on a search of the National Wetlands Inventory, there are wetlands located in the area that will be transected by the force main between the septage receiving and headworks facility. The areas mapped as wetlands are encompassed within the mapped 100-year floodplain. Construction of the force main in this area will be performed with horizontal directional drilling equipment. No surface disturbance is anticipated within the mapped wetlands. Comments from the Army Corps of Engineers (ACOE) are summarized below in **Section 4**.

Direct impacts to the terrestrial, avian, and aquatic habitats are rated **negligible impacts**.

Secondary Impacts

Secondary impacts to terrestrial, avian, and aquatic life and habitats are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to terrestrial, avian, and aquatic life and habitats are not expected with this permitting action. **No impact**.

2.6. HISTORY, CULTURE, AND ARCHAEOLOGICAL UNIQUENESS

Are there any historical, archaeological or paleontological resources present? Will the action cause a

shift in some unique quality of the area?

In preparing the draft EA, DEQ reviewed information from the Montana Cultural Resource Database and the Montana State Historic Preservation Office (MSHPO). DEQ received comments from the Confederated Salish and Kootenai Tribes (CSKT) regarding the proposal, and formally consulted with CSKT's Tribal Council on March 20, 2025, to learn more about CSKT's concerns. CSKT generally expressed concern that the permit could negatively affect its ability to exercise reserved treaty rights related to water bodies including Wiley Slough, Ashley Creek, and the Flathead River, as well as Flathead Lake. CSKT further indicated concern that issuance of the permit would constitute the functional equivalent of a direct discharge, and that consequently, negative impacts would result from pollutants—specifically nitrogen and phosphorous—entering these surface waters, resulting in a deleterious effect on the ecological health of these water bodies. Further, CSKT shared at the March 20th consultation additional concerns regarding potential impacts on fish populations; cumulative impacts to Flathead Lake; and impacts from forever chemicals and siting of a facility in a wetland area.

Direct Impacts

DEQ accessed the Montana Cultural Resource Database on 9/19/2024. There are no historical sites present in the project area, therefore no impacts to history, culture, or archaeological uniqueness are expected. **No impact**.

Additionally, as provided in response to comments and as considered in this EA, no direct impacts on downgradient surface waters are anticipated.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). No impacts to cultural resources are anticipated. The State Historic Preservation Office (SHPO) was contacted regarding the proposed improvements and their comments are summarized below in **Section 4**.

Secondary Impacts

Secondary impacts to history, culture, and archaeological uniqueness are not expected with this permitting action. **No impact**.

Because no direct impacts are expected to surface waters, no significant secondary impacts are projected to downgradient surface waters. Again, as explained in this EA and in response to comments, based on DEQ's nonsignificance analyses, which used conservative assumptions.

Cumulative Impacts

Cumulative impacts to history, culture, and archaeological uniqueness are not expected with this permitting action. **No impact**. No cumulative impacts are anticipated to surface waters. Accordingly, this project is not anticipated to cause a shift in any unique quality of the area.

2.7. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR, OR ENERGY

Will the project use resources that are limited in the area? Are there other activities nearby that will

affect the project? Are there other activities nearby that will affect the project?

Construction of the facility may result in a greater local demand for water from the local aquifer. The regional deep aquifer is the source for most of the water wells in the area. The regional deep aquifer is not the receiving water for this facility and should remain unaffected by the facility's wastewater discharge. Upon treatment, the wastewater is discharged to the subsurface, eventually migrating back to the aquifer.

Direct Impacts

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024). **Negligible impact**.

Secondary Impacts

Secondary impacts to demands on environmental resources of land, water, air, or energy are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to demands on environmental resources of land, water, air, or energy are not expected with this permitting action. **No impact**.

2.8. HUMAN HEALTH AND SAFETY

Will this project add to health and safety risks in the area?

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor. Few, if any, members of the public would be in immediate proximity to the project during construction or operations.

Direct Impacts

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current permit action (DEQ, 2024). **No impact**.

Secondary Impacts

Secondary impacts to health and human safety are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to health and human safety are not expected with this permitting action. **No impact**.

2.9. SOCIOECONOMICS

Included in this section are the following: industrial, commercial and agricultural activities and production; quantity and distribution of employment; local and state tax base and tax revenues;

demand for government services; locally adopted environmental plans and goals; access to and quality of recreational and wilderness activities; density and distribution of population and housing; social structures and mores; and other appropriate social and economic circumstances.

Will the project add to or alter industrial or agricultural activities? Will the project create, move or eliminate jobs? If so, estimated number. Will the project create or eliminate tax revenue? Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed? Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect? Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract? Will the project add to the population and require additional housing? Is some disruption of native or traditional lifestyles or communities possible?

The project would occur on private land. The wastewater treatment plant is to be maintained long-term and will have negligible impacts to population. The project area would be subject to any plans or rules set forth by Flathead County. The facility will be built on land that may have been historically used for agricultural purposes. The construction of new wastewater treatment systems and discharge structures may result in the creation of several temporary jobs until construction is completed. The operation and maintenance of the wastewater treatment system may also result in permanent jobs. Traffic may increase during the construction of any new wastewater treatment systems and discharge structures. Once construction is complete, there may be minimal traffic for the operation and maintenance of the wastewater treatment system. Wastewater treatment systems may be owned and operated by local communities or sewer districts. These systems are a vital tool in protection of public and environmental health. DEQ does not anticipate that this project would disrupt native or traditional lifestyles or communities.

Direct Impacts

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current permit action (DEQ, 2024). **No impact**.

Secondary Impacts

Secondary impacts to socioeconomics are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to socioeconomics are not expected with this permitting action. **No impact**.

2.10. PRIVATE PROPERTY IMPACTS

Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category). If not, no further analysis is required. Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required. Does the agency have Legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternative.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current MGWPCS permit action (DEQ, 2024).

Direct Impacts

The proposed project would take place on private land owned by the applicant. DEQ's approval of MGWPCS permit would affect the applicant's real property. DEQ has determined, however, that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Water Quality Act. Therefore, DEQ's approval of the MGWPCS permit would not have private property-taking or damaging implications.

No significant impacts were identified by DEQ after an in-depth review of the Application, Research, and other Government Agency References in development of the Tentative Determination documents for the current permit action (DEQ, 2024). **No impact**.

Secondary Impacts

Secondary impacts to private property are not expected with this permitting action. **No impact**.

Cumulative Impacts

Cumulative impacts to private property are not expected with this permitting action. **No impact**.

2.11. GREENHOUSE GAS ASSESSMENT

Issuance of this permit would authorize use of various equipment and vehicles to construct the septage receiving facility, the headworks, the lift station, and the buried force main.

The analysis area for this resource is limited to the activities regulated by the issuance of the MGWPCS permit and the engineering approval, which is construction of the septage receiving facility, the headworks, the lift station, and the force main, the operation of the headworks and lift station, and the discharge of treated effluent under permit conditions. The amount of gasoline and diesel fuel utilized at this site may be impacted by a number of factors including seasonal weather impediments and equipment malfunctions. To account for these factors DEQ has used a conservative estimate of the number of machine hours needed to construct the project.

For the purpose of this analysis, DEQ has defined greenhouse gas emissions as the following gas species: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and many species of fluorinated compounds. The range of fluorinated compounds includes numerous chemicals which are used in many household and industrial products. Other pollutants can have some properties that also are similar to those mentioned above, but the EPA has clearly identified the species above as the primary GHGs. Water vapor is also technically a greenhouse gas, but its properties are controlled by the temperature and pressure within the atmosphere, and it is not considered an anthropogenic species.

The combustion of diesel fuel at the site would release GHGs primarily being carbon dioxide (CO_2), nitrous oxide (N_2O) and much smaller concentrations of uncombusted fuel components including methane (CH_4) and other volatile organic compounds (VOCs).

DEQ has calculated GHG emissions using the EPA Simplified GHG Calculator version May 2023, for the purpose of totaling GHG emissions. This tool totals carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) and reports the total as CO_2 equivalent (CO_2e) in metric tons CO_2e. The calculations in this tool are widely accepted to represent reliable calculation approaches for developing a GHG inventory. DEQ has determined EPA's Scope 1 GHG impacts as defined in the Inventory Guidance for Greenhouse Gas Emissions are appropriate under MEPA for this Proposed Action. Scope 1 emissions are defined as direct GHG emissions that occur from sources that are controlled or owned by the organization (EPA Center for Corporate Climate Leadership). DEQ's review of Scope 1 emissions is consistent with the agency not evaluating downstream effects of other types of impacts.

This review does not include an assessment of GHG impacts in quantitative economic terms, otherwise known as evaluating the social cost of carbon. DEQ instead calculates potential GHG emissions and provides a narrative description of GHG impacts. This approach is consistent with Montana Supreme Court caselaw and the agency's discussion of other impacts in this EA. *See Belk v. Mont. DEQ*, 2022 MT 38, ¶ 29.

Operation of diesel-fueled vehicles throughout the life of the proposed project would produce exhaust fumes containing GHGs.

The MGWPCS permit requires regular monitoring and sampling. DEQ estimates that between approximately 8 and 14 gallons of fuel would be utilized per sampling event. Using the Environmental Protection Agency's (EPA) simplified GHG Emissions Calculator for mobile sources, between 82 and 143 kilograms of CO_2e would be produced per sampling event.

DEQ estimates that approximately 10 gallons of fuel would be utilized per unit of measurement times the number of hours listed in the attached spreadsheet. The total impacts for constructing the project are estimated to be 234 tons of CO_2 equivalent. See attached sheet for breakdown of units, hours, gallons, and CO_2 equivalent.

Secondary Impacts

GHG emissions contribute to changes in atmospheric radiative forcing, resulting in climate change impacts. GHGs act to contain solar energy loss by trapping longer wave radiation emitted from the Earth's surface and act as a positive radiative forcing component (BLM 2021).

Per EPA's website "Climate Change Indicators", the lifetime of carbon dioxide cannot be represented with a single value because the gas is not destroyed over time. The gas instead moves between air, ocean, and land mediums with atmospheric carbon dioxide remaining in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments. Methane remains in the atmosphere for approximately 12 years. Nitrous oxide has the potential to remain in the atmosphere for about 109 years (EPA, Climate Change Indictors). The impacts of climate change throughout the Flathead Valley of Montana include changes in flooding and drought, rising temperatures, and the spread of invasive species (BLM 2021).

Cumulative Impacts

Montana recently used the EPA State Inventory Tool (SIT) to develop a greenhouse gas inventory in conjunction with preparation of a possible grant application for the Community Planning Reduction Grant (CPRG) program. This tool was developed by EPA to help states develop their own greenhouse gas inventories, and this relies upon data already collected by the federal government through various

agencies. The inventory specifically deals with carbon dioxide, methane, and nitrous oxide and reports the total as CO_2e. The SIT consists of eleven Excel based modules with pre-populated data that can be used with default settings or in some cases, allows states to input their own data when the state believes their own data provides a higher level of quality and accuracy. Once each of the eleven modules is filled out, the data from each module is exported into a final "synthesis" module which summarizes all of the data into a single file. Within the synthesis file, several worksheets display the output data in a number of formats such as GHG emissions by sector and GHG emissions by type of greenhouse gas.

DEQ has determined the use of the default data provides a reasonable representation of the greenhouse gas inventory for the various sectors of the state, and the estimated total annual greenhouse gas inventory by year. The SIT data from EPA is currently only updated through the year 2021, as it takes several years to validate and make new data available within revised modules. DEQ maintains a copy of the output results of the SIT.

DEQ has determined that the use of the default data provides a reasonable representation of the GHG inventory for all of the state sectors, and an estimated total annual GHG inventory by year. At present, Montana accounts for 47.77 million metric tons of CO_2e based on the EPA SIT for the year 2021. This project may contribute up to 234.57 metric tons per year of CO2e. The estimated emission of 234.57 metric tons of CO2e from this project would contribute 0.0% of Montana's annual CO2e emissions.

GHG emissions that would be emitted as a result of the proposed activities would add to GHG emissions from other sources. The No Action Alternative would contribute less than the Proposed Action Alternative of GHG emissions. The current land use of the area is agriculture and land application of treated wastewater.

3. DESCRIPTION OF ALTERNATIVES

In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval to construct the headworks, lift station, and receiving facility, and to deny the MGWPCS permit. The applicant would lack the authority to conduct the proposed activity. Any potential impacts that would result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured. If the applicant demonstrates compliance with all applicable rules and regulations required for approval, the "no action" alternative would not be appropriate. Alternatives for each component of this state action are discussed individually below.

3.1. RAPID INFILTRATION BASIN

The "no action" alternative would deny the MGWPCS permit. The applicant would lack the authority to discharge treated domestic wastewater to state class I ground water. Any potential impacts that would result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations required for approval, the "no action" alternative would not be appropriate.

3.2. WRRF TREATMENT IMPROVEMENTS – HEADWORKS

The LCWSD treatment facility has an existing headworks screen upstream of their treatment lagoons to remove non-organic debris to improve treatment efficacy and reduce maintenance issues from downstream equipment. Given the age of the existing headworks screen at the LCWSD treatment facility, anticipated future treatment facility upgrades, and ARPA funding requirements, the LCWSD evaluated headworks facility upgrades as part of the first phase of the treatment facility improvements. In addition to the 'No Action' alternative, LCWSD considered three alternatives for potential influent screens at the proposed headworks facility.

3.2.a. No Action

This alternative would maintain LCWSD's existing headworks screen. The alternative would not address the identified current maintenance issues at the facility. Additionally, the existing headworks screen would not have adequate capacity to accommodate a mechanical treatment plant proposed with future phases of the project. For these reasons, the no action alternative was eliminated.

3.2.b. New Bar Screen

This alternative analyzed the feasibility of removing and reinstalling the existing screen in parallel with the new screen. The new headworks screen would be sized to have capacity to accept the design peak flows for the 20-year planning period. However, this alternative would require installation within an open concrete channel. With septage being included as part of the plant influent in the future, odor formation and hydrogen sulfide attack of concrete, this alternative was not considered further

3.2.c. New Drum Screen

This alternative includes installing drum screens at the headworks. Influent to the drum screens is through an inlet pipe to a headbox. The enclosed design of the drum screen would reduce offensive odors. Additionally, the drum screen would allow for removal of solids to a degree that would not preclude consideration of an MBR. For these reasons, drum screens at the headworks were considered further.

3.3. LIFT STATION #10 IMPROVEMENTS

The LCWSD considered the 'No Action' alternative in addition to two replacement alternatives as presented below.

3.3.a. No Action

The no-action alternative would not reduce risk of an SSO at Flathead Lake or address operation and maintenance issues due to aged components at Lift Station #10, so it will not be given further consideration.

3.3.b. Suction Lift Pumps

This alternative would replace the existing 10-horsepower submersible pumps with duplex suction lift pumps. Suction lift pumps operate with all mechanical pumping equipment located above the wet well, allowing for maintenance without accessing, or removing equipment from, the portion of the lift station where wastewater enters. Given existing space constraints at the lift station site, and the inability to meet required performance characteristics, the suction lift pump station alternative was not considered further.

3.3.c. Submersible Pumps

This alternative would replace the existing pumps at the lift station with a new submersible pump package placed directly into the existing wet well, which has been identified through site inspections as being in good condition. As such, this alternative was considered further.

3.4. SEPTAGE RECEIVING FACILITY

In its Technical Memorandum #3 Site Analysis and subsequent 2023 Septage Facility Design Report, Flathead County considered the 'No Action' alternative in addition to site alternatives for location of the Septage Receiving Facility.

Following revised cost estimates in 2023, a third alternative was considered. The septage receiving facility alternatives considered include:

3.4.a. No Action

The no-action alternative would not address the dire need for better septage disposal options in Flathead County, which has been exacerbated by significant rural development within the county, a subsequent increase in the number of SWTSs, stringent discharge limits and reduced availability of permitted disposal sites. The No Action alternative is not a viable option.

3.4.b. Flathead County Septage Treatment and Composting Facility

This alternative, considered as part of the county's original analysis, would include a septage receiving facility that would treat septage collected throughout the county. The treatment facility would produce two products for disposal: biosolids from the treatment process and residential-strength wastewater, which is that wastewater with constituent concentrations typical of residences (houses, apartments, condominiums, etc.). Biosolids from the treatment facility would be further treated through an onsite composting facility. The liquid portion of the received septage would be treated through a mechanical treatment plant to "residential strength" wastewater. Through an interlocal agreement between the LCWSD and Flathead County, executed in September 2023, the septic treatment facility effluent would be discharged to LCWSD's treatment facility. Per that interlocal agreement, the quantity of effluent would initially be 20,000 gallons per day (gpd)and would increase to 60,000 gpd following upgrades to the LCWSD treatment plant. The residential strength wastewater to be received by the LCWSD was generally described in the September 2023 interlocal agreement to be:

- 5-Day Biochemical Oxygen Demand – no greater than 250 milligrams/liter
- Total Suspended Solids – no greater than 250 milligrams/liter
- Total Kjeldahl Nitrogen – no greater than 40 milligrams/liter
- Total Phosphorus – no greater than 7 milligrams/liter

The proposed treatment facility would include a package headworks facility that would include screening and grit separation to remove material that would potentially damage downstream operations and to reduce organic loading. The screened influent would be discharge to an equalization (EQ) basin that would serve two purposes: allow for uniform influent flow and primary clarification through solids settlement. Following the EQ/primary clarification basin, influent would flow to a sequencing batch reactor (SBR). The SBR would utilize aeration and biological nutrient removal (BNR) to treat septage to the levels agreed upon between the LCWSD and Flathead County.

Biosolids created as part of the BNR treatment process and collected through primary clarification would

be dewatered at the facility utilizing a belt filter press prior to being incorporated into a composting facility. Composting is the biological decomposition of organic material under aerobic conditions. The biosolids composting process proposed under this alternative would be aerated static piles.

Updated cost estimates, provided in spring 2024, predicted that construction of this alternative would exceed Flathead County's available project budget, so this alternative is no longer viable.

3.4.c. Septage Receiving Facility

Following revised cost estimates for the Flathead County septage treatment and composting facility, the County, with the LCWSD, considered construction of a septage receiving facility that would not include a separate BNR treatment facility for septage. On March 19, 2024 Flathead County and the LCWSD signed a new interlocal agreement stating that LCWSD would take over design and operation of the septage receiving facility.

This alternative would include a septage receiving facility constructed in the southwest corner of the LCWSD current irrigation reuse field. Collection of received septage would pass through a ¼" coarse screen and grit chamber. Screened septage would be conveyed to the LCWSD through an approximately 7,000-foot, 6-inch high-density polyethylene (HDPE) force main to LCWSD's headworks facility from a pump station located at the septage receiving facility. The proposed facility would be housed inside an enclosed building. The building would also include heating, ventilation, and air conditioning (HVAC) to maintain air quality within the building for operator safety. All exhaust from the HVAC system would be run through a soil-media bed filter to reduce any potential odors that may be produced.

The proposed facility would not accept septage until the LCWSD completes construction of a new mechanical treatment facility in future phases of this project. The estimated cost of this alternative is $4,711,380 and is considered to be a viable option.

3.5. Capital Cost Comparison And Present Worth Analysis

Initial alternative screening, presented in the previous section, resulted in one preferred alternative for each of the project components, so a detailed present worth analysis was not performed. The estimated project construction costs for each project component are presented below.

Lift Station #10 - $390,000
Treatment Improvements Headworks – Drum Screen – $5,294,050
Septage Receiving Facility – $4,711,380

3.6. Basis Of Selection Of Preferred Alternative

Initial alternative screening resulted in one preferred alternative for each of the project components since many alternatives originally considered either exceeded available project funds or did not meet the established needs for the LCWSD. This section will present the preferred alternative for each of the three identified project areas.

3.6.a. WWRF Treatment Improvements - Headworks

Given geotechnical issues identified at the existing LCWSD wastewater treatment lagoons and the need for additional capacity, LCWSD chose to design and construct an advanced mechanical wastewater treatment facility. The final treatment type and configuration will be determined in a future facility plan.

Regardless of the mechanical treatment facility type ultimately selected by LCWSD, upgrades to LCWSD's headworks facility will be needed.

The proposed project will include a new headworks facility to the southeast of the existing LCWSD wastewater treatment lagoons. The headworks facility will include three drum screens capable of handling the projected planning period peak flows. Following screening, influent will flow through a grit removal chamber and be conveyed to the current LCWSD treatment lagoons. Screenings and grit removed will be collected in waste receptacles to be disposed of at the landfill.

The type of screen at the facility was selected to provide the greatest flexibility to consider alternatives for a future Phase 2 upgrade to a mechanical treatment plant at the LCWSD facility. No overall increase in the treatment facility capacity will be realized with the new headworks facility until Phase 2 improvements are complete. All screening facilities will be installed within a new building to maintain temperatures during the winter months to eliminate the maintenance issues currently experienced with the existing headworks screen. The building will include HVAC to ensure operator safety and equipment protection. All exhaust from the building will flow through a soil media bed filter to reduce offensive odors.

3.6.b. Lift Station #10

Submersible pump replacement is the only viable alternative that would meet established project need and provide the required system hydraulics.

The proposed project will include replacement of the existing submersible pumps at Lift Station #10 with a new duplex submersible lift station package, installation of a new pump control and valve building adjacent to the existing wet well, and a new diesel power generator.

3.6.c. Septage Receiving Facility

Following revised cost estimates in spring 2024, it was determined that a more efficient construction and operational model would be to construct a septage receiving facility that would discharge screened septage to the LCWSD wastewater treatment facility.

The proposed septage receiving facility will include a building that will house preliminary septage treatment equipment that includes influent screening and grit removal. Screenings and grit removed from septage will be collected in waste receptacles to be disposed of at the landfill. The building will include HVAC to ensure operator safety and comfort. All exhaust from the building will flow through a soil media bed filter to reduce offensive odors.

Septage haulers wishing to unload will enter the facility off Somers Stage Road, which will be improved as part of the project from the intersection with Highway 93 north to the facility entrance. A concrete pad at the unloading ramp will be sloped to ensure any spillage will be collected and routed to the treatment plant. Two quick connections are proposed to allow for unloading septage. A keypad, capable of recording the source of the septage, is proposed. Each unloading bay will include an inline pH meter that will shut down the flow stream if the pH of the septage is out of range, to prevent potential disruptions to the LCWSD WWTP processes. A full-time operator at the septage receiving station will have the ability to test each influent load of septage for strength and toxicity.

Screened septage will be collected and pumped through a 7,000 foot, 6-inch force main to the LCWSD WWTP. An equalization basin will be installed at the WWTP as part of the Phase 2 project to allow for

uniform mixing of plant influent. The septage receiving facility will not accept wastewater until future Phase 2 improvements at the LCWSD are complete.

Federal and State grant/loan programs will fund the project. The proposed project is estimated to cost approximately $13,422,047. The LCWSD will contribute $983,058. The remainder of needed funds will be provided through $10,421,899 in American Rescue Plan Act (ARPA) fiscal recovery funds, a Western Montana Conservation Commission (WMCC) funds of $90,000, a low interest loan (2.5% for 30 years) from the Montana Department of Environmental Quality's (DEQ's) Water Pollution Control State Revolving Fund (WPCSRF) Program in the amount of $1,300,000, and a $627,090 WPCSRF loan with principal forgiveness.

The current average LCWSD monthly sewer rate is $42.53. The current average sewer rate is less than the Montana Department of Commerce's (MDOC's) wastewater Target Rate for the Lakeside CDP of $49.78. The current average Somers Water & Sewer District monthly sewer rate is $43.94 which is less than the MDOC's wastewater Target Rate of $57.01 for the Somers CDP.

The current sewer revenue generated by LCWSD appears adequate to cover the debt service of this project, so a rate increase is not likely.

The financial impact of LCWSD's current sewer rate on system users is shown below. The existing monthly sewer cost per household is approximately 0.8% of the monthly median household income. Based on EPA guidance for project affordability, a sustained sewer user rate is not expected to impose a substantial economic hardship on households.

Project Affordability		
	Lakeside CDP	Somers CDP
Monthly residential sewer rate	$42.53	$43.94
Monthly median household income (mMHI)[1]	$5,531	$6,335
Sewer rate as a percentage of mMHI	0.8%	0.7%

1 – Ref 2015-2019 US Census Bureau American Communities Survey data

4. CONSULTATION

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries with the permittee's application materials and the following websites:

- Montana Natural Heritage Program
- Montana State Historic Preservation Office

DEQ used the publicly available information from these websites to conduct the impact analysis discussed above in **Section 2**.

The following agencies were contacted regarding the proposed action:

The Montana Department of Natural Resources and Conservation (DNRC) was solicited for comments via letter on September 26, 2024, regarding impacts to the floodplain due to the proposed project. DNRC responded via an email on October 2, 2024 stating that portions of the proposed project are located adjacent to a FEMA mapped regulatory floodplain. Construction within a mapped floodplain will require a permit from Flathead County. LCWSD will submit a floodplain permit to Flathead County.

The Montana Department of Fish, Wildlife and Parks (MTFWP) was solicited for comments via letter on April 30, 204 and September 26, 2024 regarding any impacts to fish and wildlife due to the proposed project. No comments from MTFWP have been received at the time of this report.

The Montana State Historic Preservation Office (SHPO) was solicited for comments via letter on September 26, 2024 and reviewed the project for historical significance. SHPO responded via email on October 2, 2024. According to their records, there have been a few previously recorded sites and a few cultural resource inventories done within the designated search locales. SHPO stated that as long as there will be no disturbance or alteration to structures over fifty years of age they feel that there is a low likelihood that cultural properties would be impacted and, as such, felt a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or cultural materials be inadvertently discovered during the project, SHPO must be contacted, and the site investigated.

The U.S. Department of the Army Corps of Engineers (USCOE) was solicited for comments via letter on April 30, 2024 and September 26, 2024, regarding impacts to wetlands due to the proposed project. The USCOE stated in an October 9, 2024 response letter that if the proposed involves activities within navigable reivers of the United States, it may be subject to a Section 10 permit. The letter also stated that placement of fill material in any area below the ordinary high-water mark of any stream channel, lake or pond, or wetland would require a 404 permit. LCWSD emailed the USACE on October 10, 2024 to provide additional project specific information to determine whether a permit through the agency would be required. The USACE responded on October 30, 2024 that the project does not require Department of the Army approval under section 404 of the Clean Water Act nor under Section 10 of the Rivers and Harbors Act. Since there is no USACE 404 authorization, there is no Section 401 certification by DEQ.

The U.S. Fish and Wildlife Service (USFWS) was solicited for comments via letter on April 30, 2024 and September 26, 2024. No response from the USFWS has been received at the time of this report.

DEQ also engaged in consultation with CSKT's Tribal Council upon invitation on March 20, 2025, which shared its concerns with DEQ regarding the project. Concerns shared by CSKT are reflected in section 2.6 of this EA and documented in DEQ's response letter, sent on April 10, 2025, which is part of the record for this permit.

The Montana Sage Grouse Habitat Conservation Program website was consulted to determine whether the project has any potential impacts to sage grouse. It was determined that the project is not located in an Executive Order Area and further efforts are not warranted regarding sage grouse.

5. SIGNIFICANCE OF POTENTIAL IMPACTS AND NEED FOR FURTHER ANALYSIS

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in ARM 17.4.608, which are as follows:

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
- The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
- The importance to the state and to society of each environmental resource or value that would be affected;
- Any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
- Potential conflict with local, state, or federal laws, requirements, or formal plans.

DEQ assessed potential impacts with the assumption that the facility will comply with the terms and conditions of the permit. Violations of the permit could lead to significant adverse impacts to state waters. Violations of the permit are not an effect of the agency action since the permit itself forbids such activities. However, the Department has taken steps to ensure that violations do not occur. The Department provides technical assistance to permittees for operation and maintenance, and in understanding and implementing the requirements of the permit. The Department also conducts periodic inspections of permitted facilities and identifies potential problems with design or management practices. If violations of the permit do occur, the Department will take appropriate action under the Montana Water Quality Act. Enforcement sanctions for violations of the permit include injunctions, civil and administrative penalties, and cleanup orders.

The preferred action is to issue the new individual MGWPCS discharge permit and approve construction of replacement lift station #10, the new headworks, the septage receiving facility, and the buried force main connecting the receiving and treatment facilities. This action is preferred because the permit provides a regulatory mechanism for protecting ground water quality by applying effluent limits and monitoring requirements to the discharged wastewater. The wastewater treatment plant upgrades are needed to prevent failure of aging infrastructure and accommodate ongoing and planned growth.
The septage receiving facility will facilitate continued maintenance of septic systems in the Flathead Valley as municipal treatment plants such as Kalispell increasingly refuse to accept septage.

An EIS is not required under MEPA because the project lacks significant adverse effects to the human and physical environment based on above listed criteria.

As described above, DEQ's decision to issue MGWPCS Permit No. MTX000307 authorizes discharge of treated wastewater to Class I ground water. Approval of the phase 1 engineering plans authorizes construction of the replacement lift station #10, the new headworks, the septage receiving facility, and the buried force main connecting the receiving and treatment facilities. The discharge is subject to permit conditions and limitations that would protect beneficial uses and prevent significant changes in water quality. The impacts from construction of the receiving and treatment infrastructure may result in dust but are expected to be of short duration and not significant. Environmental impacts resulting from issuance of the MGWPCS permit and authorization of the construction are localized and would be

managed through permit conditions and limitations. At the time of this analysis, there are no known conflicts with local, state, or federal laws, requirements, or plans.

6. PUBLIC INVOLVEMENT

Since 2007 the LCWSD has held multiple meetings to discuss the need to address future capacity limitations at their wastewater treatment facility. Since 2023, LCWSD has maintained a webpage, available from their homepage, that is dedicated to the proposed project. The webpage includes links to a description of the project history, proposed location, FAQs, and regular updates. District board meeting agendas and minutes, that include regular business information and project updates are available on their homepage. The webpage also includes a sign-in widget for interested persons to submit comments and stay informed about the project. Flathead County also maintains a webpage dedicated to the septage receiving facility. The county webpage includes a description of the project history, FAQs, as well as links to planning documents, interlocal agreements, and editorials.

On June 13, 2024 LCWSD held an open house to present the proposed Phase 1 construction project as well as potential further treatment facility improvements Phase 2. The meeting was noticed through monthly bills, social media postings, and through LCWSD's website. The meeting, held at the Somers-Lakeside Fire Station, included information display boards presenting each step of the proposed system improvements. District representatives and their consulting engineers were available for questions from residents. Comment and question cards were available at open house, and 30 people signed the "sign-in" sheet.

The public comment period was open from December 9, 2024 through February 27, 2025 and included a public hearing on February 27, 2025. Over 600 public comments were received. The Department responded to these in the 2025 Response to Comments document. No changes have been made in the drafting of the final permit and environmental assessment documents.

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4/28/2025

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Date

7. REFERENCES

2021 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, 2021 BLM Specialist Report - GHG Emissions and Climate Trends

EPA. Climate Change Indicator: Greenhouse Gases. Climate Change Indicators: Greenhouse Gases | US EPA

EPA Center for Corporate Climate Leadership, Scopes 1, 2 and 3 Emissions Inventorying and Guidance | US EPA.

Montana Department of Environmental Quality. 2025. Administrative Record for the Montana Ground Water Pollution Control System (MGWPCS) Permit: MTX000307.

Montana Natural Heritage Program

Montana State Historic Preservation Office

The following documents have been utilized in the engineering review of this project and are considered to be part of the project file:

1. Lakeside Wastewater System 2007 Preliminary Engineering Report, June 2007, prepared by Robert Peccia & Associates.

2. Lakeside Wastewater System 2013 PER Amendment, March 2013, prepared by Robert Peccia & Associates.

3. Lakeside Wastewater System 2019 PER Amendment, March 2020, prepared by Jackola Engineering & Architecture.

4. Lakeside Water and Sewer District Wastewater System Improvements Project ARPA Water and Sewer Infrastructure Grant Application, July 15, 2021, prepared by Robert Peccia & Associates.

5. LCWSD Wastewater System Improvements – Technical Memorandum, July 13, 2021, prepared by Robert Peccia & Associates.

6. LCWSD Wastewater Treatment Facility – Headworks Improvement Plan, August 2024, prepared by Robert Peccia & Associates.

7. Uniform Application and Priority List Survey – Lakeside Wastewater Improvements Project, January 2022, prepared by Lakeside County Water & Sewer District and Robert Peccia Associates, Inc.

8. Flathead County Septage Treatment & Biosolids Composting Facility – Basis of Design Report, December 22, 2023, prepared by HDR.

9. Flathead County Septage Treatment & Biosolids Preliminary Design – Technical Memorandum #3 Site Analysis, January 23, 2023, prepared by HDR.

10. Miscellaneous Correspondence – Lakeside Wastewater Improvements Project, March 2022 – August 2024, prepared by Robert Peccia Associates, Inc.