

Flathead County
Board of Commissioners
(406) 758-5503



Brad W. Abell
Randy L. Brodehl
Pamela J. Holmquist

April 17, 2024

Melinda Horne, Permit Writer
Montana Dept. of Environmental Quality
MGWPCS Program, Water Protection Bureau
P.O. Box 200901
Helena MT 59620-0901

Ms. Horne,

I am writing to express full support from Flathead County for the Lakeside County Water and Sewer District's (LCWSD) application for a groundwater discharge permit. We believe that granting this permit is of utmost importance. The permit will allow LCWSD to increase capacity and improve their operations, while also addressing the pressing issue of septage disposal and portable restroom waste disposal in our region.

Flathead County recognizes the critical need for an acceptable solution to manage septage and portable restroom waste, especially given the significant number of septic systems in the Flathead Valley. With approximately 30,000 septic systems existing in our region, the potential environmental and public health risks associated with inadequate disposal methods cannot be overstated.

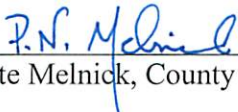
Furthermore, approving this permit aligns with Flathead County's commitment to environmental stewardship and responsible resource management. We recognize the importance of maintaining water quality standards to preserve the health and well-being of our communities, as well as to protect the natural beauty of our surroundings, which are integral to our local economy and way of life.

I urge the Montana Department of Environmental Quality to consider the gravity of the situation and to expedite the review and approval process for the Lakeside County Water and Sewer District's groundwater discharge permit application. Granting this permit will not only address an urgent need for proper waste disposal but also demonstrate a proactive approach to safeguarding our environment for current and future generations.

Thank you for your attention to this matter.

Sincerely,

OFFICE OF THE FLATHEAD COUNTY
BOARD OF COMMISSIONERS



Pete Melnick, County Administrator



Evergreen
Water & Sewer
DISTRICT 1

Flathead County Water District No.1
130 Nicholson Drive
Kalispell, MT 59901
P: 406-257-5861
E: info@evergreenwaterdistrict.com

April 17, 2024

Melinda Horne, Permit Writer

MGWPCS Program, Water Protection Bureau

Montana Dept. of Environmental Quality

Melinda.Horne@mt.gov

Dear Ms. Horne:

Evergreen Water & Sewer District (formal name: Flathead County Water District #1 – Evergreen) serves approximately 10,000 residents in the Evergreen community, which is part of the unincorporated area of Flathead County and adjacent to the City of Kalispell. Our sewer system was built in the mid-nineties and consists of septic tanks as well as conventional sewer facilities.

The District has approximately 1500 septic tanks that are connected to our sewer system for liquids discharge but must be pumped on a schedule to manage the solids. We also have a conventional sewer system with twenty-six lift stations that must be cleaned quarterly and lines that need to be jetted on a schedule. All of this waste/septage is currently pumped by a third-party contractor as the District has no pump trucks and no disposal site. Our current pumper is A1 Sanitation and the septage is land-applied in Flathead County. Our non-septage wastewater is pumped to the City of Kalispell's wastewater treatment plant. We have requested permission to dispose of septage at the City's facility and they have refused our request.

I am writing to urge DEQ to expedite approval of the discharge permit requested by Lakeside Water & Sewer District that will facilitate construction of Flathead County's Septage Treatment Facility ("Facility"). Attached are two resolutions passed by the District's elected Board of Directors providing strong support for the Facility. As the attached resolution outlines, we recently went out for bid on the septage pumping and disposal and received only one bid from

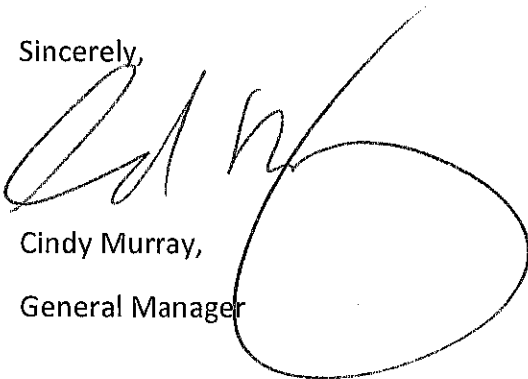
A1-Sanitation that was more than 250% of our 2023 pumping costs. While we have seen a rise in service costs throughout our operations, this increase was unprecedented and unacceptable. A significant number of our septic customers are also low-income so passing these costs directly on to them would create serious financial and social consequences.

In recent months, we have also seen the availability of pumper services decline due to the lack of disposal sites and lack of personnel, especially in off-hours, such that we are currently unable to deal with after-hours emergencies if there are no pumpers available. We have also been contacted by outside parties stating that they plan to take legal action to shut down certain disposal sites. While we plan to rebid our pumping/disposal services, until we have a County-wide disposal alternative, our customers are subject to price increases and reduced service delivery and/or interruptions.

I understand that DEQ must carefully evaluate the permit application, but I would ask that the urgency of this matter be considered during DEQ's review given the serious threats to public health and safety that will be addressed effectively by the discharge permit/proposed Facility. The environmental consequences and community impacts of the lack of disposal alternatives if the permit is not granted should be considered carefully as part of the evaluation of the permit application. I would be happy to provide testimony if a live hearing is conducted.

Thank you for your careful consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cindy Murray', is written over a large, empty oval shape that serves as a placeholder for a stamp or seal.

Cindy Murray,
General Manager

Attachments: Board Resolutions 2024-04 and 2023-13



130 Nicholson Drive
Kalispell, MT 59901

P: 406-257-5861

E: info@evergreenwaterdistrict.com

RESOLUTION 2024-04

CONSIDERING THE BID OF A-1 SANITATION FOR SEPTIC TANK PUMPING SERVICES

Whereas, the District has contracted with septic tank pumpers with licensed disposal facilities to pump more than 1500 septic tanks owned by the District; and

Whereas, the District issued an Invitation to Bid on January 9, 2024, for Septic Tank Pumping Services; and

Whereas, the District proceeded with the required advertisements of the Invitation to Bid in the Daily Interlake in Flathead County on January 10, 2024, and January 28, 2024, with posting on the District's website; and

Whereas, the District received only one bid form submittal from A-1 Sanitation by the deadline of 3:00 p.m. on February 1, 2024, which was deemed to have been timely submitted and to have met the minimum requirements; and

Whereas, in Fiscal Year 2023 (July 1, 2022 – June 30, 2023), the District had previously been paying pumpers, including A-1 Sanitation, an average of \$269 for pumping a 1,000 gallon tank with additional surcharges, as appropriate; and

Whereas, the bid by A-1 Sanitation proposed, among other prices, an increase to \$956 per 1,000 gallon tank (more than a 250% increase) with additional surcharges, as appropriate; and

Whereas, an increase of the magnitude contained in the A-1 Sanitation bid would have significant rate impacts for the District's sewer customers and could result in potential surcharges to septic tank customers, including lower-income customers of the District; and

Whereas, after careful consideration, the District Staff is recommending that the Board reject the Bid submitted, which is allowed under the Bid Invitation that provides: "The right is reserved to reject any or all proposals received . . ."; and

Whereas, after careful consideration, the District Staff is recommending that all possible options for septic tank pumping be considered to provide the District with services that are reliable, economical, and promote public health and safety; and

Whereas, the District remains committed to its support of Flathead County's proposed Septage Treatment Plant, which the Board has supported in Resolution 2023-13 to provide alternative septage disposal for the benefit of the District's customers and ratepayers as well as other residents of Flathead County.

Resolution 2024-04

Concerning the Bid of A-1 Sanitation for Septic Tank Pumping Services

February 21, 2024


NOW THEREFORE BE IT RESOLVED that the Board of Directors approves the recommendations of the District Staff, formally rejects the Bid for Septic Tank Pumping Services submitted by A-1 Sanitation on February 1, 2024, and directs the District Staff to consider all possible options for required services; and

FURTHER BE IT RESOLVED that the Board formally requests Flathead County to expedite the Septage Treatment Plant project for the benefit of the District's customers and ratepayers as previously detailed in Resolution 2023-13, which is attached to this Resolution, and directs District Staff to send this Resolution to the Flathead County Commissioners.


Dated: February 21, 2024

FLATHEAD COUNTY WATER DISTRICT #1 - EVERGREEN BOARD OF DIRECTORS

By: _____


B.J. Lupton,
President

ATTEST:



Secretary to the Board

Attachment: Resolution 2023-13



Evergreen
Water & Sewer
DISTRICT 1

RESOLUTION 2023- 13

SUPPORT FOR THE

PROPOSED FLATHEAD COUNTY SEPTAGE TREATMENT PLANT AND COMPOSTING FACILITY

Whereas, the Board of Directors of the Flathead County Water District #1 - Evergreen ("District") has been following very closely the County's initiative to build a Septage Treatment Plant and Composting Facility ("Project") in the Flathead Valley using ARPA funding; and

Whereas, on July 12, 2023, B.J. Lupton, Vice-President, sent a letter of support for the Project to the Flathead County Commissioners; and

Whereas, at various Flathead County Commission meetings, General Manager, Cindy Murray, has provided significant supportive testimony on behalf of the District Staff; and


Whereas, the District Staff has developed "Talking Points" to provide background and support for this Project, which are attached to this Resolution as Exhibit "A"; and

Whereas, considering the great value this Project will have for the District and the extreme urgency to complete the Project due to deadlines for the use of ARPA funding.

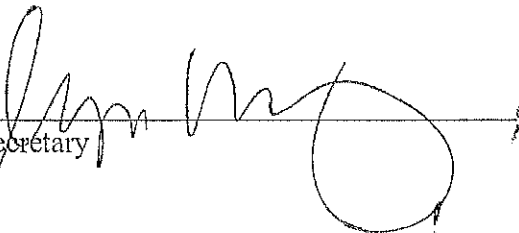
NOW, THEREFORE, BE IT RESOLVED that the Board of Directors urges the Flathead County Commission to take all appropriate action to encourage and push this Project forward to completion at the earliest possible time.

Signed August 16, 2023

FLATHEAD COUNTY WATER DISTRICT #1 – EVERGREEN

By: 

Title: PRESIDENT

Attest: 
Secretary

Resolution 2023-13

Support for the Proposed Flathead County Septage Treatment Plant and Composting Facility

August 16, 2023



Evergreen
Water & Sewer
DISTRICT 1

**SUPPORT FOR THE FLATHEAD COUNTY SEPTAGE TREATMENT FACILITY
TALKING POINTS**

COUNTY

Septage is pumped waste from septic tanks, porta-potties, and Vacor trucks that are used to clean or repair sewer facilities of municipalities, HOA's, and districts such as Evergreen.

Environmental regulations are increasingly focused on land applications and soon may mandate that all septage be treated in a facility.

The County has been given federal and state funds to acquire property and to build a septage treatment plant. The County will purchase a suitable location for this facility considering many factors.

Time is of the essence due to the deadlines for use of the ARPA funding.

The County's plant will serve the entire valley and treat sludge produced by all the wastewater treatment plants in Kalispell, Whitefish, and Columbia Falls, reducing the impacts on the landfill.

The plant will turn septage and sludge into compost that is safe to use on lawns and flower gardens. Septage is a win-win for everyone.

DISTRICT

Currently the District contract with two providers who pump the tanks and then land-apply the septage at a licensed dumpsite in the Valley.

The District owns 1500 septic tanks that generate septage. That is nearly 2/3rds of the Evergreen's sewer system making the District the largest septage producing utility in the Flathead Valley.

Annual septage generated by the District from septic tank pumping alone is approximately 350,000 gallons per year.

For the usage and reliable operation of the sewer system, the District needs a septage treatment plant.

Building a plant just for the District would severely increase sewer rates for Evergreen customers. A county-wide solution for septage treatment is also the best solution for the District.

The District will continue to use local providers for the septage pumping when it is feasible and cost effective so the septage treatment plant will not put tank pumpers out of business.

OTHER SUPPORTERS

Environmental groups such as the Flathead Lakers and many other community stakeholders support this project.

The Flathead Basin Commission, which focuses on protection of the water resources in the Valley, supports the project and has provided additional grant funding to the County.

Flathead County
Board of Commissioners

(406) 758-5503



Brad W. Abell
Randy L. Brodehl
Pamela J. Holmquist

April 25, 2024

Chris Dorrington, Director
Montana Dept. of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Director Dorrington,

As representatives of the 115,000 residents of Flathead County, we are writing to emphasize the critical importance of supporting your staff and approving Lakeside County Water and Sewer District's application for a groundwater discharge permit without delay. We urge the Department to demonstrate courage and vision in recognizing the necessity of this permit for our community's well-being and environmental sustainability.

Lakeside County Water and Sewer District has a proven track record with 36 years of successful wastewater management. The discharge permit will increase capacity and allow transition to more advanced treatment methods. The permit also offers a solution to the urgent issue of septage disposal and portable restroom waste disposal in our region. With the rapid growth in rural parts of the Flathead Valley, the need for a regulated and environmentally sound waste management system is paramount.

As their elected representatives, we want to stress that the vast majority of Flathead County's residents stand firmly behind this solution.


Therefore, we implore the Montana Department of Environmental Quality to act swiftly and decisively in approving the groundwater discharge permit application. By doing so, you will not only be fulfilling your regulatory responsibilities but also aligning with the will and best interests of the community we both serve.

We trust in your wisdom and commitment to upholding the principles of environmental protection and public health.

Sincerely,
BOARD OF COMMISSIONERS
FLATHEAD COUNTY, MONTANA



Randy L. Brodehl, Chairman



Pamela J. Holmquist, Member



Brad W. Abell, Member



CC: Melinda Horne, Montana Dept. of Environmental Quality

Congress of the United States
House of Representatives
Washington, DC 20515-2601

April 26, 2024

Melinda Horne, Permit Writer
MGWPCS Program, Water Protection Bureau
Montana Dept. of Environmental Quality
PO Box 200901, Helena MT 59620-0901

Ms. Horne,

I am writing to express my full support for the Lakeside County Water and Sewer District's (LCWSD) application for a groundwater discharge permit. The permit will allow LCWSD to increase capacity and improve their operations, while also addressing the pressing issue of septage disposal and portable restroom waste disposal in our region.

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For God and Country,



RYAN ZINKE
Congressman (MT-01)
52nd Secretary of the Interior
Commander U.S. Navy SEALs (Ret.)



MATT REGIER
SPEAKER

Office of the Speaker

MONTANA HOUSE OF REPRESENTATIVES

Melinda Horne, Permit Writer
MGWPCS Program, Water Protection Bureau
Montana Dept. of Environmental Quality
PO Box 200901, Helena MT 59620-0901

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Sincerely,

A handwritten signature in blue ink that reads "Matt Regier".