

APPENDIX B



September 13, 2019

Seeley Lake Sewer District
Attn: Pat Goodover, President
3360 Highway 83 North
Seeley Lake, MT 59868

Missoula City-County Health Department
Environmental Health Division
Attn: Shannon Therriault, Division Director
301 West Alder
Missoula, MT 59802

Missoula City County Board of Health
Attn: Ross Miller, Chair
Missoula City-County Health Department
301 West Alder
Missoula, MT 59802

RE: Seeley Lake Groundwater Quality

Dear Mr. Goodover, Ms. Therriault, and Mr. Miller;

As the administrative agency charged with regulating pollution in state waters, the Department of Environmental Quality (Department) is aware of the ongoing nitrate pollution in the Seeley Lake community. We are supportive of the efforts the Seeley Lake Sewer District (District) is taking to remedy this pollution by installing a centralized sewer system.

The Department's involvement at Seeley Lake has spanned many years. Most recently, we have been working with the District via plan and specification review of the proposed centralized collection and treatment system. In addition, we understand the District will likely take advantage of the Department's State Revolving Fund to assist with interim funding of the project to allow the District to cover the project's costs until their other sources of funding (primarily from USDA Rural Development) are made available.

Through this involvement, the Department has reviewed studies that show septic-caused nitrate contamination in the Seeley Lake community including monitoring information that shows elevated nitrate levels in groundwater with some nitrate concentration measurements that exceeded the maximum contaminant level of 10 mg/L. This data also shows the nitrate levels in the groundwater are trending upward.

The Department considers efforts to significantly reduce or eliminate ongoing discharge of individual and business wastewater systems to the aquifer to be the appropriate action to protect state waters, the environment, and public health. To that end, we understand that the District plans to bid Phase I and II of the project in January 2020 with the intent to start construction by Summer or Fall 2020. The work that the District has put forth is important and necessary to protect water quality, as is Missoula County's support toward accomplishing this goal.

The Department is aware that the District has suffered some setbacks in the past but is working to complete the project now. Because the proposed sewer project would directly remove the sources causing groundwater degradation, the Department urges the District to stay on course to complete the project. The funding package that the District has for this project is impressive, including \$9.7 million of grant money for the first two phases alone, most of which is provided by the USDA Rural Development Program. Further delays to the project would likely put the USDA grant funds for the project at risk.

Should circumstances arise that cause the District to abandon or delay efforts toward completing this project, the Seeley Lake community may lose its best option to remedy the nitrate pollution. That would not, however, remove the need for corrective action to protect state waters, the environment, and public health.

Given the opportunity currently available through the funding provided to the District, the Department commends and supports the District's efforts to remedy these problems through the locally-led solution of installing a centralized sewer system. Please let us know how the Department can continue to support this effort.

Respectfully,

A handwritten signature in black ink, appearing to read 'Tim Davis', with a long horizontal line extending to the right.

Tim Davis, Administrator
Water Quality Division
Department of Environmental Quality