DEQ
Montana Department
of Environmental Quality

January 23, 2015

FINAL FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED GOVERNMENTAL AGENCIES AND PUBLIC GROUPS

As required by state and federal rules for determining whether an Environmental Impact Statement is necessary, an environmental review has been performed on the proposed action below:

Project	Eureka-Midvale Wastewater System Improvements Project
Location	Eureka, Montana
Project Number	WPCSRF Project # C303200
Total Cost	$2,400,000 ($1,400,000 Phase 1a, $1,000,000 Phase 1b)

The Town of Eureka, Montana through the 2007 Wastewater Facilities Planning Study (PER) and subsequent April 2010 Addendum and a March 2012 Memorandum, all prepared by the Dryer Group, Inc., has identified the need to extend their wastewater collection system to serve the Midvale community, which was recently annexed by the town of Eureka. In addition to replacing their primary lift station and replacing approximately 900 feet of gravity main piping, the town proposes to construct approximately 22,500 feet of new gravity piping (8" and 10" diameter), install approximately 80 manholes, seven grinder pumps and 3,000 feet of small diameter force main. The proposed sewer main will cross Highway 93, which will be bored and not open-cut. Several streets will be impacted by the construction and will be repaired with similar surfacing. Approximately 193 existing homes and businesses are currently in the Midvale area and could eventually be connected to the Eureka wastewater treatment system. The 20-year planning period expects another 222 homes and businesses to be connected to the system.

The proposed improvements, including administration, engineering, and construction, are estimated to cost approximately $2,400,000. Due to the cost for all proposed improvements, the project will be split into two phases. Approximately $1,400,000 has been secured by the town to fund the first phase of improvements, which are expected to be completed in the summer of 2015. The first phase (Phase 1a) will include the construction of approximately 4,800 feet of 8" and 2,400 feet of 10" gravity pipe, install 24 manholes, replace approximately 900 feet of 8" gravity pipe on 1st Avenue East, and replace the existing primary lift station. Most of the Phase 1a work will occur along the Highway 93 corridor and for properties on the west side of Highway 93. Just over half of the Midvale community (111 homes and businesses) will be served by the Phase 1a improvements. The Phase 1b improvements will be constructed when funds are available and will include the Midvale area located east of Highway 93.

The town hopes to use grants as much as possible to fund the project, but expects to use low interest loans also. The proposed first phase of improvements includes a grant from the Treasure State Endowment Program (TSEP) for $625,000, and the town will borrow $775,000 from the Water Pollution Control State Revolving Fund (WPCSRF) at the Department of

Environmental Quality (DEQ). Funding for the Phase 1b improvements has not been determined, but may include another grant from TSEP grant, a grant from the Renewable Resource Grant and Loan (RRGL) program, which is administrated by the Montana Department of Natural Resources, a grant/loan from the USDA Rural Development program, and loan from the WPCSRF program.

Federal and State grant/loan programs will fund the project. Environmentally sensitive characteristics such as wetlands, floodplains, historical sites, and threatened or endangered species are not expected to be adversely impacted as a result of the proposed project. No significant long-term environmental impacts were identified, but a Section 404 permit will be required from the Corp of Engineers for construction of the outfall pipe which will occur at the Missouri River.

An environmental assessment (EA), which describes the project and analyzes the impacts in more detail, is available for public scrutiny on the DEQ web site (**http://www.deq.mt.gov/ea.mcpx**) and at the following locations:

Jerry Paddock, P.E.
Department of Environmental Quality
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-09011
jpaddock@mt.gov

LeeAnn Schermerhorn, Mayor
Town of Eureka
108 Dewey Avenue
Eureka, MT 59917

Comments on the EA may be submitted to the Department of Environmental Quality at the above address. After evaluating substantive comments received, the department will revise the environmental assessment or determine if an environmental impact statement is necessary. If no substantive comments are received during the comment period, or if substantive comments are received and evaluated and the environmental impacts are still determined to be non-significant, the agency will make a final decision. No administrative action will be taken on the project for at least 30 calendar days after release of the Finding of No Significant Impact.

Sincerely,

Todd Teegarden

Todd Teegarden, Bureau Chief
Technical and Financial Assistance Bureau

TOWN OF EUREKA

EUREKA-MIDVALE WASTEATER SYSTEM IMPROVEMENTS PROJECT

ENVIRONMENTAL ASSESSMENT

I. COVER SHEET

A. PROJECT IDENTIFICATION

Applicant: Town of Eureka

Address: PO Box 313
Eureka, MT 59917

Project Number: C303200

B. CONTACT PERSON

Name: Mayor LeeAnn Schermerhorn

Address: PO Box 313
Eureka, MT 59917

Telephone: (406) 297-2123

C. ABSTRACT

The Town of Eureka, Montana through the 2007 Wastewater Facilities Planning Study (PER) and subsequent April 2010 Addendum and a March 2012 Memorandum, all prepared by the Dryer Group, LLC., has identified the need to extend their wastewater collection system to serve the Midvale community, which was recently annexed by the town of Eureka. In addition to replacing their primary lift station and replacing approximately 900 feet of gravity main piping, the town proposes to construct approximately 22,500 feet of new gravity piping (8" and 10" diameter), install approximately 80 manholes, seven grinder pumps and 3,000 feet of small diameter force main. The proposed sewer main will cross Highway 93, which will be bored and not open-cut. Several streets will be impacted by the construction and will be repaired with similar surfacing. Approximately 193 existing homes and businesses are currently in the Midvale area and could eventually be connected to the Eureka wastewater treatment system. The 20-year planning period expects another 222 homes and businesses to be connected to the system.

The proposed improvements, including administration, engineering, and construction, are estimated to cost approximately $2,400,000. Due to the cost for all proposed improvements, the project will be split into two phases. Approximately $1,400,000 has been secured by the town to fund the first phase of improvements, which are expected to be completed in the summer of 2015. The first phase (Phase 1a) will include the construction of approximately 4,800 feet of 8" and 2,400 feet of 10" gravity pipe, install 24 manholes, replace approximately 900 feet of 8" gravity pipe on 1st Avenue East, and replace the existing primary lift station. Most of the Phase 1a work will occur along the Highway 93 corridor and for properties on the west side of Highway 93. Just over

half of the Midvale community (111 homes and businesses) will be served by the Phase 1a improvements. The Phase 1b improvements will be constructed when funds are available and will include the Midvale area located east of Highway 93.

The town hopes to use grants as much as possible to fund the project, but expects to use low interest loans also. The proposed first phase of improvements includes a grant from the Treasure State Endowment Program (TSEP) for $625,000, and the town will borrow $775,000 from the Water Pollution Control State Revolving Fund (WPCSRF) at the Department of Environmental Quality (DEQ). Funding for the Phase 1b improvements has not been determined, but may include another grant from TSEP grant, a grant from the Renewable Resource Grant and Loan (RRGL) program, which is administrated by the Montana Department of Natural Resources, a grant/loan from the USDA Rural Development program, and loan from the WPCSRF program.

D. COMMENT PERIOD

Thirty (30) calendar days.

II. PURPOSE AND NEED OF PROJECT

The unincorporated community of Midvale, Montana was recently annexed into the town of Eureka. Midvale is located adjacent to and north of Eureka and includes approximately 500 people and the Lincoln County High School. Other than the high school, the wastewater treatment needs of homes and businesses are presently served by individual septic tank/drainfield systems. The high school is served by a lift station that pumps sewage to the Eureka wastewater collection system. The septic tank/drainfield density in most of Midvale is classified by the Montana Department of Environmental Quality (DEQ) as "medium and high hazard". See Figure 4. A 25 square block area immediately north of Eureka has been classified as a "high hazard" area.

Medium and high hazard classifications indicate a significant potential for groundwater contamination from the septic tank/drainfield systems due to the density of the systems in the area. Testing of some drinking water wells in the area indicate elevated levels of nitrate, which is commonly associated with high densities of septic tank/drainfield systems. Moreover, there has been a fairly significant rate of bacterial contamination found in water wells in the area. High levels of nitrates in drinking water are a health hazard, especially for infants. The soils underlying the Midvale area include poorly sorted gravels and clays or silts. These soils are not conducive to providing the necessary additional treatment to the wastewater after the drainfield and therefore also may be a cause of the degradation of the groundwater.

III. ALTERNATIVES INCLUDING THE PROPOSED ACTION

A. ALTERNATIVES DESCRIPTION

Numerous alternatives to wastewater treatment, collection, and disposal were thoroughly developed, presented and evaluated in the PER and subsequent updates. Viable collection, treatment, and disposal methods were combined to form viable wastewater treatment alternatives from the PER and supplemental documents. This resulted in the consideration of three alternatives, including the no action alternative. The following alternatives were considered:

Alternative 1 – No Action
Alternative 2 – Construct Midvale Treatment and Collection System
Alternative 3 – Regional Treatment System with Eureka and Collection System

A gravity collection system, using natural slopes and terrain, and a pressure piping/pump system, to serve areas not conducive to gravity flow, are common to alternatives 2 and 3. Most of the Midvale area can be served using a conventional gravity sewer system, but where topography will not allow the gravity system to be feasibly constructed, a pressure system utilizing individual grinder pumps and small diameter force mains would be implemented. Both systems are reliable and the Eureka maintenance staff has a working knowledge of them.

ALTERNATIVE 1 NO ACTION - The no action alternative considered no change to the existing septic and drainfield systems in the Midvale community other than replacing the systems, should they fail . Homes and businesses would continue to use septic and drainfield systems to treat their wastewater. Due to the high density of the septic systems in the Midvale area and soils which are not generally suitable to provide additional treatment of the effluent in the drainfield, there is a potential to further contaminate the groundwater in the Midvale area. Elevated levels of nitrate have been found in drinking water wells in the Midvale area, indicating that the groundwater may already be contaminated from septic tank/drainfield effluent. Drinking water wells may continue to be contaminated by septic tank/drainfield effluent. The no action alternative was not considered to be a viable option for the town of Eureka and the residents of Midvale.

ALTERNATIVE 2 – CONSTRUCT MIDVALE TREATMENT AND COLLECTION SYSTEM – This alternative would include constructing a gravity collection system, aerated wastewater treatment facility, and effluent disposal system to serve the Midvale community. A gravity sewer system would serve most of the Midvale community, but where the gravity system is not feasible, a pressure sewer collection system would be utilized. Most of the piping would be installed in the public right-of-way and existing easements. However, some easements would be required to cross private property. The treatment system considered in this alternative includes a three cell aerated lagoon treatment system which is similar to Eureka's wastewater treatment system. Approximately nine acres of surface area would be required for the treatment system. All locations considered should meet the minimum standards for separation between residential development and the treatment system. However, siting the new wastewater treatment system could be challenging due to negative impacts associated with odors and noise. There may also be impact to wetlands and groundwater, as well as the direct disturbance to the surface during construction. A new treatment system would require the discharge of treated wastewater (effluent) and the discharge of effluent to surface water was considered to be the most feasible option. The effluent discharge would most likely be to the Tobacco River and would require a new Montana Pollutant Discharge Elimination System (MPDES) permit issued by the DEQ. It is worth mentioning that a new wastewater discharge permit may be difficult to obtain and may take several years. A new treatment and collection system would most likely require the town to hire a full-time trained wastewater operator to oversee the system. This alternative was determined to be a viable solution for the town of Eureka and was given further consideration in the PER.

ALTERNATIVE 3 – REGIONAL TREATMENT SYSTEM WITH EUREKA AND COLLECTION SYSTEM – This alternative would include constructing a gravity and pressure sewer collection system as discussed in Alternative 2. However, because the

wastewater would be conveyed to the existing Eureka wastewater treatment system, which has adequate available capacity, new treatment and effluent outfall systems would not be required. No impacts would occur to the existing treatment facility due to the additional wastewater flow. However, the discharge (flow rate) to the Tobacco River would increase slightly, but not more than the town's discharge permit allows. The quality of the discharge water is not expected to change significantly and should remain in compliance with existing permit limits. The primary sewage lift station, which serves Eureka, is near the end of its useful life and is in need of improvements, regardless of whether the Midvale community is connected to the Eureka system or not. Some minor improvements must occur to the High School lift station as well. Approximately 1,000 feet of 8-inch existing sewer pipe, which would also convey the Midvale flow, would require replacement due to the poor condition of the pipe. The town of Eureka already has certified operators to operate the treatment and collection systems. Over time, additional staff may be necessary in order to handle the additional workload. This alternative was determined to be a viable solution for the town of Eureka and was given further consideration in the PER.

B. COST COMPARISON – PRESENT WORTH ANALYSIS

The approximate construction costs and annual operation and maintenance costs are summarized in Table 1 for the alternatives considered. These costs are from the 2007 PER and supplemental amendments, but have been left in 2007 dollars for comparison of the alternatives. The present worth analysis is a means of comparing alternatives using present-day (2007) dollars. The present worth value of the annual operating and maintenance costs is calculated using the appropriate uniform series present worth factor for a 20-year planning period. The present worth value of the operating and maintenance costs are then added to the present worth value of the construction costs to provide the total present worth cost of each alternative. These values are used to determine the most cost-effective alternative. Although the costs are not current, they easily show that constructing a new collection system to serve the Midvale community and connecting it to the existing Eureka wastewater treatment system is more cost effective than constructing a new treatment system for the Midvale area. Constructing a new collection system and connecting it to the Eureka treatment system was the recommended alternative in the PER.

TABLE 1
PRESENT WORTH FOR ALTERNATIVES CONSIDERED *

Alternative	Capital Cost	Annual O&M Cost	Present Worth Cost
2. Construct Midvale Treatment and Collection System	$4,199,100	$83,700	$5,113,036
3. Regional Treatment System with Eureka and Collection System	$3,256,500	$55,500	$3,838,054

*Costs are 2007 dollars.

Since the 2007 PER was completed, two amendments to the PER have been prepared by the town's engineer to address updated information. The PER recommended that the pumps be replaced in the primary Eureka lift station, but due to recent efforts to make repairs to the pumps, a decision was made to replace the entire primary lift station. Moreover, some service line improvements proposed in the 2007 PER was removed, which lowered the capital cost of alternatives 2 and 3 equally.

The updated capital cost for the recommended alternative in the 2012 Memorandum was adjusted to $2,400,000, which is the current cost and includes administration, engineering, and construction costs. The town of Eureka wishes to make all the recommended improvements as soon as possible. However, the town wishes to do the improvements in two phases to spread the costs out over several years. As noted above, the first phase will include extending the sewer main along the Highway 93 corridor and to properties west of the highway. In the first phase, the town also proposes to replace the existing primary lift station and repair some existing sewer main which is in poor shape. The cost for these improvements is expected to be approximately $1,400,000. To fund the Phase 1a improvements, the town has secured a grant from the Montana Department of Commerce Treasure State Endowment Fund (TSEP) for $625,000 and the town will borrow up to $775,000 at 2.5 % interest from the Water Pollution Control State Revolving Fund (WPCSRF) loan program. The Phase 1a construction is expected to begin in the summer of 2015 and take four to six months to complete. The second phase of improvements will include placing sewer mains for the Midvale properties located east of Highway 93 and will cost approximately $1,000,000. Funding sources for the Phase 1b improvements are unknown at this time, but the town hopes to secure another grant from TSEP and obtain a grant from the Renewable Resource Grant and Loan (RRGL) program, which is administrated by the Montana Department of Natural Resources and Conservation (DNRC) and obtain grants and loans from from the USDA Rural Development program. Loans from the WPCSRF program may also be used, if necessary. The schedule to complete the Phase 1b improvements is also unknown because the funding source(s) have not been determined.

C. BASIS OF SELECTION OF PREFERRED ALTERNATIVE

Typically the selection of the preferred alternative is based on monetary and non-monetary criteria and a ranking table with several weighted criteria is necessary. But for the proposed improvements, the cost and impact of constructing the collection system to serve the Midvale community was the same in both alternatives considered, and the cost difference to connect to the Eureka wastewater treatment system (Regional Treatment System) or construct a new treatment system was significant. The Regional Treatment System was selected due to the lower capital costs, it disrupted the community the least, it had the least environmental impacts to the area, and it would also require less overall operational requirements and costs (annual O&M) for the town.

For the proposed Phase 1a improvements, the average monthly sewer rate will increase $2.40 per month, resulting in a new average sewer rate of $44.88 per month per user. The financial impact of Phase 1a on the system users is shown in Table 2. Based on the EPA guidance for project affordability, the proposed project will result in a monthly cost per household that is over 2.0 % of the monthly median household income, and therefore, may place a substantial financial burden on some of the households within the community.

TABLE 2
PROJECT AFFORDABILITY – PHASE 1A

Existing Monthly wastewater service rate	$42.48
Total monthly user cost[1]	$44.88
Monthly median household income (mMHI)[2]	$2,150
User rate as a percentage of mMHI	2.1 %

[1] November 26, 2014 Uniform Application for Montana Public Facility Projects
[2] Based on 2010 census data (DOC – Eureka town)

The Phase 1b improvements are expected to cost $1,000,000. Until the funding options are known for the Phase 1b improvements, the cost impact on users is difficult to establish. The 2007 PER indicated that rates may vary from $43 to $53 when all the improvements are complete.

IV. AFFECTED ENVIRONMENT

A. DESCRIPTION OF THE PROJECT PLANNING AREA AND MAPS

The Town of Eureka, Montana (including Midvale) is an incorporated community located along US Highway 93 in Lincoln County in the extreme northwestern corner of Montana, (see Figure 1). Eureka is situated on one of the main access routes between Montana and Canada and is an important business center in the east half of Lincoln County. The physical boundaries of the planning area are the town limits of Eureka (including the community of Midvale and developing areas to the north of Eureka). The planning area boundaries encompass all of the existing wastewater collection and treatment system area that will accommodate anticipated growth for the next 20 years. Figure 2 shows the planning area. Figure 3 is a location map showing the general project area and the preferred alternative. Figure 4 is a map showing the septic tank density-risk.

The town is predominately residential with a small central business district on Dewey Avenue (US 93). Most of the businesses are retail or service-oriented in nature. There are no major industries within Eureka, but there is a forest product shipping center located across the river on the railroad and a sizeable lumber mill just north of the study area.

B. POPULATION AND FLOW PROJECTIONS

At the present time Eureka's wastewater system serves just over 1,000 people with 425 service connections. Daily flows average nearly 106,000 gallons per day (gpd). The population of the Midvale community is estimated to be 490 people and the town expects a flow contribution of 49,000 gpd when the Midvale system is constructed and all lots are connected. The projected population for year 2027 is expected to be 1,763 people with an average day flow is 176,300 gpd. The treatment capacity of the Eureka treatment system is 225,000 gpd.

C. NATURAL FEATURES

The town of Eureka is located on the Tobacco River in the extreme northwestern corner of Montana. The present Tobacco River drainage is located in a geologic feature known as the Rocky Mountain trench. The trench is a relatively narrow depression between mountain ranges that extends for over 1,000 miles from Montana northwest to the Yukon.

In the recent geologic past, glaciers have covered the Rocky Mountain Trench at least three times. Glacial deposits are extensive and include both depositional and erosional features. Glacial features in the planning area consist of undifferential lacustrine silt, clay, glacial drift, gravel and alluvial fan material. The glacial activity left behind a rolling terrain accented by numerous ridges, bluffs, and hills. For this reason, the topography of the area is quite varied. Large changes in elevation exist between different regions of town and the treatment facilities.

Soils in the area are characteristic of glacial deposits. These consist of randomly interspersed deposits of silts, clays, sands and gravels. The highly variable nature of these soils gives rise to several areas of high groundwater and perched aquifers. Groundwater levels seem to peak in relation with spring snow melt and recede to their lowest levels after long dry summers. Groundwater in many areas of the town is generally three to five feet below the ground surface during the peak season.

Many springs are known to exist in the study area. These springs are the result of groundwater from higher elevations moving through the perched aquifers on impervious soil layers until they surface on hillsides in various locations.

V. ENVIRONMENTAL IMPACTS OF PROPOSED PROJECT

A. DIRECT AND INDIRECT ENVIRONMENTAL IMPACTS

Land Use/Prime Farmland - All the areas served by the project are already developed and are located within previously disturbed areas within the town. Accordingly, the project will not take farmland out of production. The proposed improvements support existing land uses and provide for the logical and orderly growth and development of the town, within established, designated, and impacted areas. The solutions to be implemented will accommodate needed growth and development consistent with current and long-term economic, social, and environmental needs without creating unwarranted sprawl or conversion of lands to other uses.

Floodplains and Wetlands - Proposed construction work will not occur within mapped floodplain or wetland areas. There will be no direct impact to jurisdictional wetlands. See Section X: Agencies Consulted of this report for a summary of the Army Corps of Engineers and the Department of Natural Resources and Conservation comments.

Cultural Resources and Historical Sites - No impacts to cultural resources are anticipated. The proposed improvements should not impact historic or cultural resources since all proposed improvements will be constructed within the existing disturbed areas. The State Historic Preservation Office (SHPO) reviewed the proposed project. They conducted a cultural resource file search for the area and concluded that there is a low likelihood that cultural properties will be impacted by the proposed project, and that a cultural resource inventory is unwarranted at this time. However, if cultural materials are inadvertently discovered during this project, SHPO must be contacted and the site investigated. See Section X: Agencies Consulted of this report for a summary of their comments.

Fish and Wildlife - Animal life will not be significantly affected by the proposed project. The project will not affect any critical wildlife habitats, nor will any known endangered species be affected. The Montana Department of Fish, Wildlife, and Parks and U.S. Fish and Wildlife Services were notified of this project and asked to reply with any concerns. The U.S. Fish and Wildlife Services determined there would be no effects to federally protected species. See Section X: Agencies Consulted of this report for a summary of their comments.

Water Quality - The proposed sewer collection system will reduce the potential for groundwater contamination from the high density of septic tank/drainfield systems in the Midvale community. These systems are most likely responsibly for high levels of nitrates and bacterial contamination in local drinking water wells.

The existing wastewater treatment facility is designed to serve a population of 2250 with a design flow of 0.225 MGD. Those numbers were used to establish the facility's baseline allocated non-degradation load limits (BOD and TSS) in the MPDES discharge permit. Any increase above these baseline allotments is subject to the provisions of Montana's Non-Degradation Policy 75-5-303, MCA, and would require the facility to provide a higher level of treatment for compliance. Recent discharge data has shown that the existing facility is currently discharging approximately 53% of the allotted BOD and TSS loads. Once the Midvale services are connected, the facility would be discharging at approximately 78% of the allotted BOD and TSS loads. The town is therefore well within their allotted load allocation for those parameters.

A Tobacco Planning Area Sediment TMDLs and Framework Water Quality Improvement Plan (Plan) was completed by Montana Department of Environmental Quality in September 2011 and approved by the EPA. The *Plan* established a TMDL for total suspended solids (TSS) discharged from the Eureka WWTF at 100 mg/L or 188 pounds per day which the new facility should be able to easily meet. Compliance with allocated load limits associated with non-degradation, TMDLs, and potential nutrient limits are not expected to be an issue.

Air Quality - Short-term negative impacts on air quality are expected to occur during construction from heavy equipment in the form of dust and exhaust fumes. Proper construction practices will minimize this problem. Project specifications will require dust control.

Public Health - Public health will not be negatively affected by the proposed project. The new lift station will resolve operator safety concerns. The proposed sewer collection system will eliminate the risks from the existing septic tank/drainfield systems, which are most likely responsible for high levels of nitrates and bacterial contamination in local drinking water wells.

Energy - An increase in energy consumption should occur after the new lift station is constructed. New pumps should be more efficient than the existing pumps, but the energy savings may be offset by the additional energy used by the climate control and additional pump control and monitoring equipment. The consumption of energy resources directly associated with construction of the recommended improvements is unavoidable, but will be a short-term commitment.

Noise - Short-term impacts from excessive noise levels may occur during the construction activities. The construction period will be limited to normal daytime hours to avoid early morning or late evening construction disturbances. The emergency generator for backup power to the existing lift station will be used at the new lift station. As with the existing lift station, it only operates during power outages and occasionally (30 minutes once a month) to ensure proper operation. Because the new lift station is replacing the old lift station, no additional noise is expected. The proposed grinder pumps will be located in manholes (underground) and therefore no noise impacts are expected. No significant long-term impacts from noise should occur.

Sludge Disposal – No sludge removal, handling, or disposal will be a part of the proposed improvements at the Eureka wastewater treatment facility. However, individual septic tanks will be abandoned in areas where service lines are extended. The property owners will be responsible for abandoning their septic tanks. Typically the septic tanks are pumped and abandoned by filling them with sand. A licensed septic tank pumper must be contracted to pump each tank and dispose of the contents (in accordance with Montana's septage disposal regulations).

Environmental Justice - Environmental Justice Executive Order 12898: The proposed project will not result in disproportionately high or adverse human health or environmental effects on minority or low income populations. All base sewer rates will be increased equally. No disproportionate effects among any portion of the community would be expected.

Wild and Scenic River Act - The proposed project will not impact any rivers designated as wild and scenic by Congress or the Secretary of the Interior.

Growth - The population of Eureka prior to annexing the Midvale community was just over 1,000 people and the current population of the Midvale community was just under 500 people. The 20-year design population of Eureka, which is based on a growth rate of approximately 0.7% per year, is projected to be 1,763 people. Once the Phase 1a construction is complete, the town expects approximately 111 connections or about 250 people to connect to the wastewater treatment system. In the short term, three to five years, the town expects about 72 connections or about 188 people to connect to the system. The impact to the treatment system will be minimal due to the timing. Once the second phase of improvements is complete, the population will increase in a similar fashion and the impact to the wastewater treatment system will be similar to Phase 1a. The wastewater treatment facility has a capacity to treat wastewater from a population of about 2,250.

Cumulative Effects - The Midvale community already exists and therefore no significant secondary and/or cumulative impacts are anticipated with the proposed improvements. Secondary impacts linked to housing, commercial development, solid waste, transportation, utilities, air quality, water utilization, and possible loss of agricultural and rural lands may occur. These secondary impacts are uncertain at this time and therefore cannot be directly addressed in the EA. However, these impacts will need to be managed and minimized as much as possible through town policies and proper community planning. There are several existing town, county and state regulations already in place (i.e., zoning regulations, comprehensive planning, subdivision laws, etc.) that control the density and development of property with regards to water supply, sewage disposal, solid waste disposal, transportation, and storm drainage systems.

B. UNAVOIDABLE ADVERSE IMPACTS

Short-term construction related impacts (i.e., noise, dust traffic disruption, etc.) will occur but should be minimized through proper construction management. Energy consumption during construction cannot be avoided.

VI. PUBLIC PARTICIPATION

Public participation has been long and involved. Public informational meetings were held during development of the PER and a properly advertised public hearing was conducted on March 13, 2007 to discuss the proposed project. Questions and comments centered mostly on the following wastewater items and were answered:

- Ensure distribution of costs between the residents of Midvale and Eureka.
- Service lines will be extended to the property line – owners will be responsible to make the connection of their service line to the service line.
- Construction start immediately to avoid inflation.
- Does the Eureka treatment plant have capacity?
- Ensure Midvale users pay hookup fee.

- Ensure road repairs are included in the project (can't include work/items not already in-place (e.g. curb and gutter)
- Stress the importance that the project will improve groundwater quality.

A Town Council Meeting was held on December 10, 2012 to discuss the Treasure State Endowment Program Environmental Assessment (TSEP EA) prepared for the proposed Phase 1a improvements. The TSEP EA had been advertised in the local newspaper on November 13, 2012 and requested public comments by December 10, 2012. No comments were received and there were no comments at the public meeting.

VII. AGENCY ACTION, APPLICABLE REGULATIONS AND PERMITTING AUTHORITIES

All proposed improvements will be designed to meet state standards in accordance with Circular DEQ-2, and will be constructed using standard construction methods. Best management practices will be implemented to minimize or eliminate pollutants during construction. No additional permits will be required from the State Revolving Fund (SRF) section of DEQ for this project after the review of the submitted plans and specifications. However, coverage under the storm water general discharge permit and groundwater dewatering discharge permit, are required from the DEQ Water Protection Bureau prior to the beginning of construction. A 124 Permit from the Department of Fish, Wildlife and Parks, a 404 Permit from the U.S. Corps of Engineers, and a 318 Authorization from the Department of Environment Quality will be required for any work that occurs in a streambed or (jurisdictional) wetlands, and will be obtained if necessary.

VIII. RECOMMENDATION FOR FURTHER ENVIRONMENTAL ANALYSIS

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

Rationale for Recommendation: Through this EA, DEQ has verified that none of the adverse impacts of the proposed town of Eureka wastewater improvement project are significant. Therefore, an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607, 17.4.608, 17.4.609, and 17.4.610. The EA is the appropriate level of analysis because none of the adverse effects of the impacts are significant.

IX. REFERENCE DOCUMENTS

1. Final Wastewater Preliminary Engineering Report for the Midvale, Montana Area, September 2007, prepared by Dyer Group, LLC.
2. Addendum to Wastewater Preliminary Engineering Report Midvale, Montana Area, April 2010, prepared by Dyer Group, LLC.
3. Memorandum Town of Eureka, Montana, Update to Wastewater Preliminary Engineering Report – Midvale, Montana, Area, March 13, 2012, prepared by Dyer Group, LLC.
4. Uniform Application Form for Montana Public Facility Projects for the Town of Eureka, November 26, 2014.
5. Tobacco Planning Area Sediment TMDLs and Framework Water Quality Improvement Plan, prepared by Montana Department of Environmental Quality, September 2011

X. AGENCIES CONSULTED

Letters were sent to the following agencies requesting comments on possible impacts that this project could have on the environment or any other issues of concern:

Lincoln County	US Environmental Protection Agency
US Fish and Wildlife Service	US Army Corps of Engineers
Natural Resources & Conservation Service	Montana Dept. of Environmental Quality
Montana Dept. of Fish, Wildlife and Parks	Montana State Historic Preservation Office
Confederated Salish & Kootenai Tribes	Montana Department of Transportation

The request letters included a project description and several maps of the project area. The following are agencies comments concerning environmental impacts that should be considered on the project:

1. The US Fish & Wildlife Service concluded that the project will have no effects to federally protected species.

2. The State Historic Preservation Office (SHPO) did not find any previously recorded sites within the designated area. They felt there is a low likelihood cultural properties would be impacted.

3. The Department of the Army Corps of Engineers commented that should for any work anticipated in a wetland or stream channel, a Section 404 permit is probably required. A permit will be necessary for any crossings of the streams or wetlands.

Lincoln County, Montana Department of Fish, Wildlife and Parks, DNRC, Confederated Salish and Kootenai Tribes, US EPA, DEQ did not respond to the request (no comments received).

EA Prepared by:

Jerry Paddock, P.E. Date 1/23/15

EA Reviewed by:

Mike Abrahamson, P.E. Date 1/23/15

FIGURE 1
LOCATION MAP

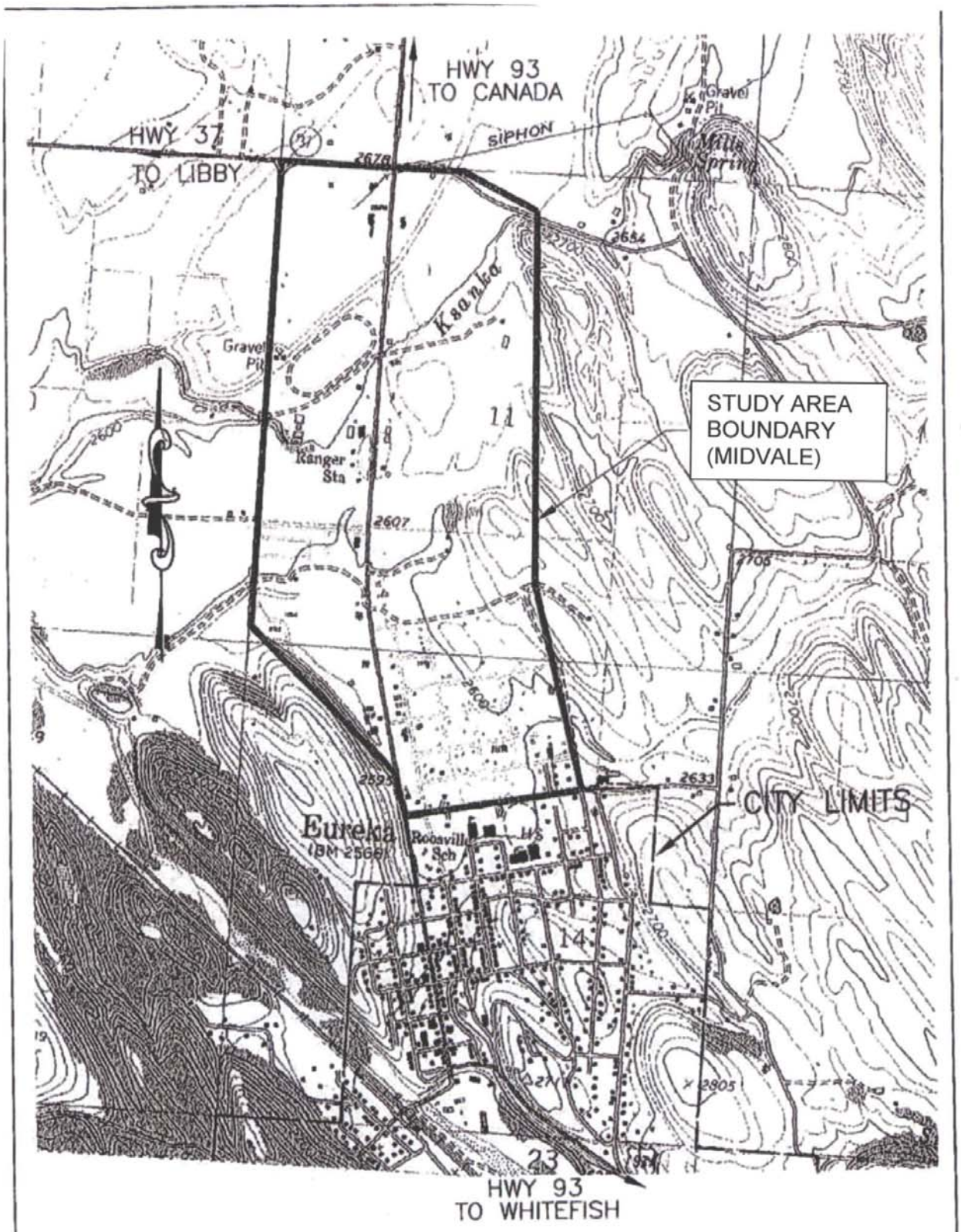

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FIGURE 2
EUREKA WASTEWATER (STUDY)
PLANNING AREA

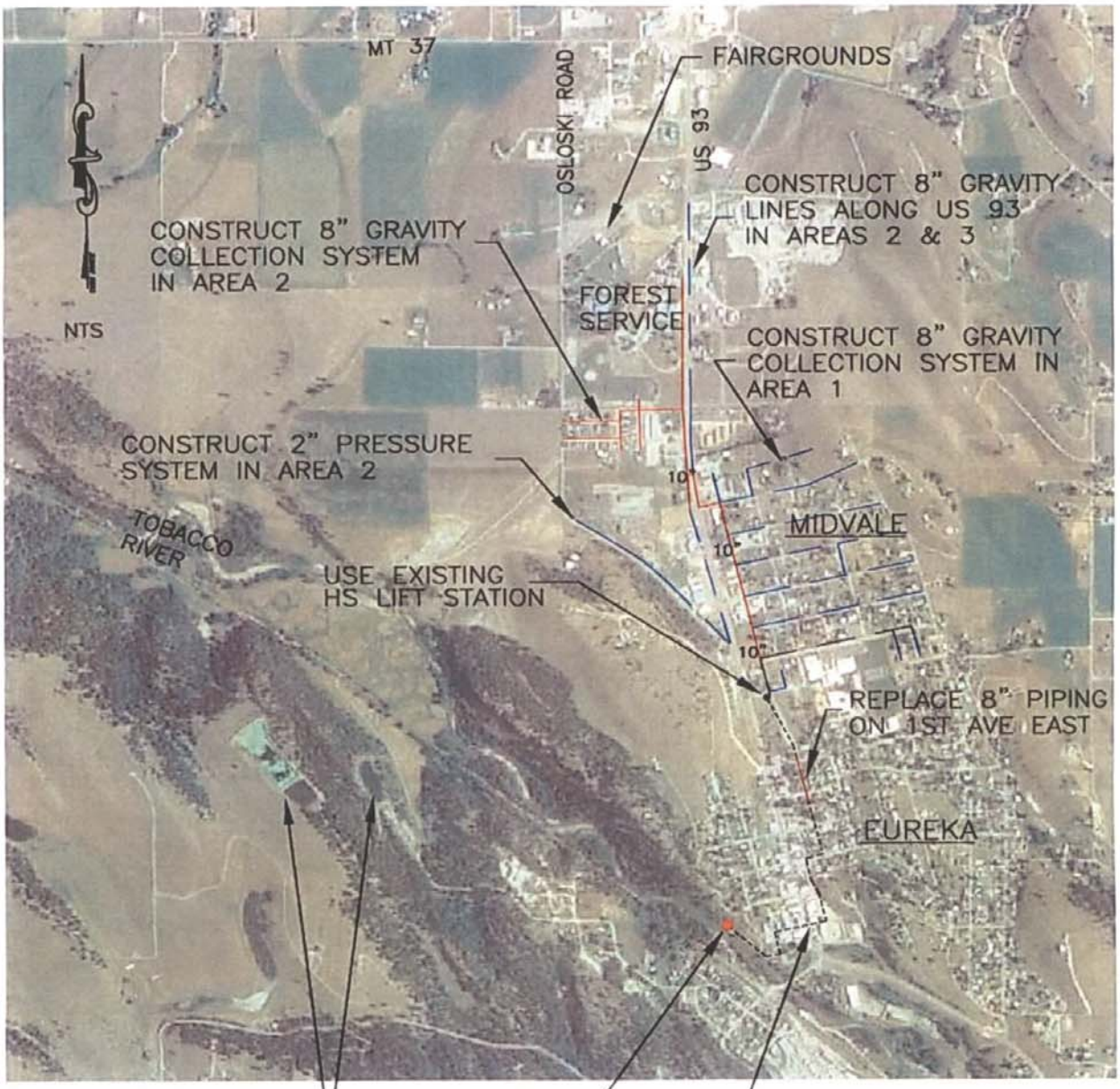

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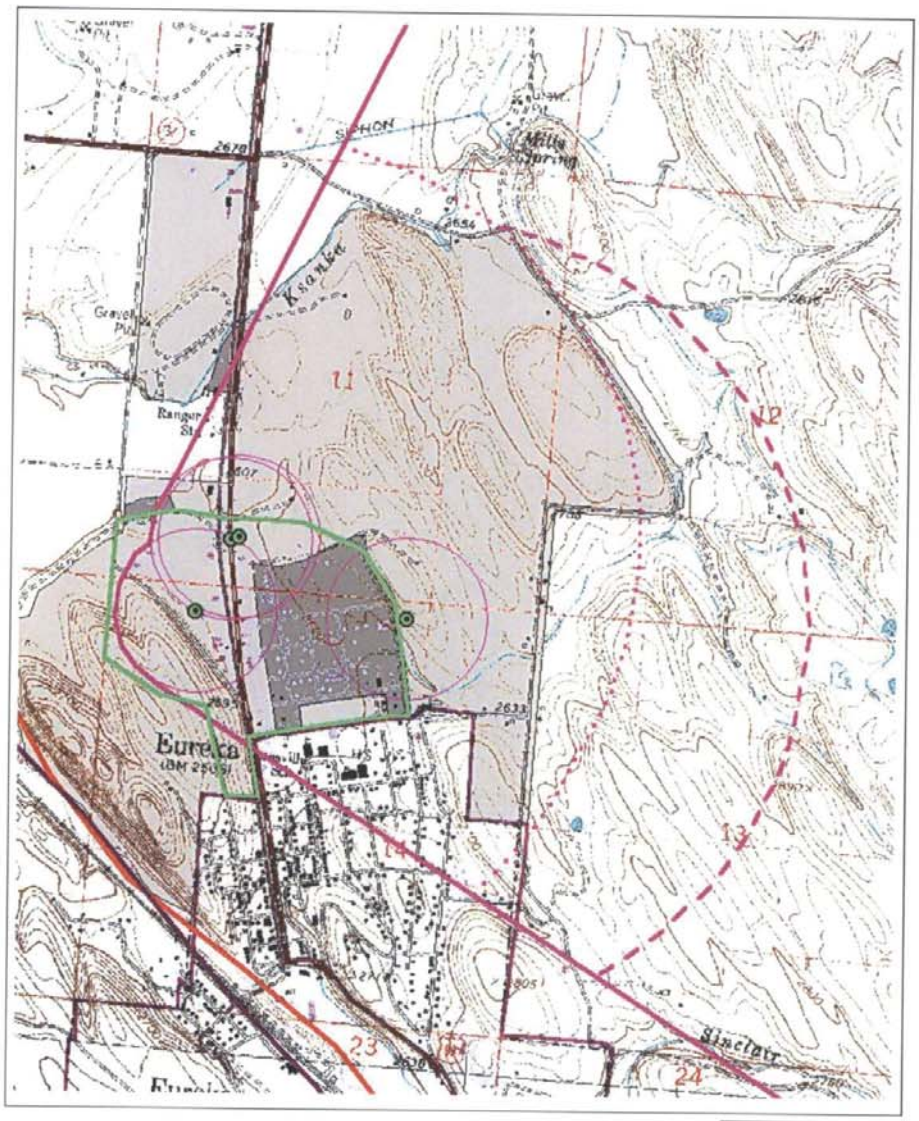
FIGURE 3
EUREKA PREFERRED ALTERNATIVE



Source: Source Water Delineation and Assessment Report, Midvale Water and Sewer District, PWSID # M0000211, November 2001

FIGURE 4
SEPTIC TANK/DRAINFIELD DENSITY RISK MAP