

TABLE OF CONTENTS

Designation of Environmental Certifying Official

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

List of Figures

Figure 1 – Potential Impacts of Collection Upgrades

Figure 2 – Potential Impacts of Treatment Upgrades

Appendices

Appendix A	Airport Hazards
Appendix B	Coastal Resources
Appendix C	Floodplain
Appendix D	Clean Air
Appendix E	Contamination and Toxic Substances
Appendix F	Endangered Species
Appendix G	Explosive and Flammable Hazards
Appendix H	Farmlands Protection
Appendix I	Historic Preservation
Appendix J	Noise Abatement and Control
Appendix K	Sole Source Aquifers
Appendix L	Wetlands
Appendix M	Wild and Scenic Rivers
Appendix N	Agency Letters and Correspondence

DESIGNATION OF ENVIRONMENTAL CERTIFYING OFFICIAL

September 24, 2025

Erin McKeon
Montana Department of Commerce
Community Development Division
301 S. Park
P.O. Box 200523
Helena, MT 59620

Dear Erin,

This is to notify you that Wayne Woodall, Mayor, is designated as the Environmental Certifying Official responsible for all activities associated with the environmental review process to be completed in conjunction with the 2023 CDBG grant awarded to the Town of Saco, Montana.

Sincerely,



Signature*

Wayne Woodall, Mayor
Typed Name and Title



**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Wastewater System Improvements - Phase 2

Responsible Entity: Town of Saco

Grant Recipient (if different than Responsible Entity): Town of Saco

State/Local Identifier: Montana

Preparer: Kasia Bothman-Little, Compliance Specialist, Great West Engineering

Certifying Officer Name and Title: Wayne Woodall, Mayor

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Great West Engineering, Inc

Direct Comments to: Wayne Woodall, Mayor, townsaco@nemont.net

Project Location:

The Town of Saco is located within Philips County on U.S. Highway 2 (US 2), about 30 miles east of Malta. Figure 2-1 shows the vicinity map. The planning area for this PER encompasses the incorporated limits of the Town and the existing wastewater treatment lagoons, as shown in Figure 2-2. The existing wastewater system provides collection and treatment for the entire incorporated Town limits.

The Town is specifically located at:

- Township/Section Range: Township 31 N, Range 34 East, Sections 7, 8 & 17
- Latitude/Longitude: 48° 27' 26" North Latitude, 107° 20' 33" West Longitude
- Average Elevation: 2,182

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades.

The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St.

The lagoon upgrades will only involve minor improvements within the footprint of the current lagoon site, such as minor repairs to the lagoon berms, including minor earthwork operations, which will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The Wastewater System Improvements Phase 2 project in the Town of Saco, Montana, emerges from a critical need to address the failing state of the town's existing wastewater infrastructure. The clay collection system currently in place has been documented as deficient, posing significant health, sanitation, and security risks. Groundwater contamination, the intrusion of excess inflow and infiltration (I&I) flows, and the recurring sanitary sewer overflows (SSOs) into residential homes, businesses, and even places of worship underscore the urgent need for a system overhaul.

The aging collection system has been identified by specialists as one of the poorest in condition following an extensive video inspection. The deterioration encompasses severe corrosion in manholes, blockages from intruding taps that impede inspection equipment, and sections of pipe so severely damaged they risk catastrophic failure. These issues highlight the chronic vulnerability of the existing infrastructure to environmental stresses, directly resulting in SSOs that jeopardize public health and property.

Local community members have voiced their concerns through letters detailing the distressing impacts of sewer overflows into their homes, leading to considerable property damage and heightened health risks. Periodic system surcharging during high rainfall or groundwater events not only exacerbates these issues but also underlines the system's inadequate capacity to handle environmental pressures.

In summary, the proposed Wastewater System Improvements Phase 2 project is driven by an urgent need to replace and rehabilitate the failing sewer collection system. By addressing these critical infrastructure weaknesses, the project aims to eliminate groundwater contamination risks, prevent disruptive and

unhealthy SSOs, and ensure the town's wastewater system meets the community's health, sanitation, and security needs both presently and in the future.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The existing conditions of the project area, which pertain to the wastewater system, are characterized by an infrastructure designed to manage and treat the community's sewage. This system involves a complex network of gravity sewer mains, a central lift station, a piping collection system made primarily of clay, a primary sewage lift station leading to a dual-cell facultative lagoon treatment system, and an effluent discharge system. The sewer mains facilitate the flow of waste from the town core and across significant infrastructure to reach the community lift station, then onwards to the treatment lagoons. An additional residential service area on the town's south side also contributes to the sewage conveyed to this lift station.

The Town's system relies on its clay piping collection, which has served as the backbone for many decades, with some portions being over a century old. The main lift station, critical for elevating sewage to the force main for treatment, is over 60 years old and utilizes a deep wet well/dry well mechanism, introducing challenges in maintenance and operation due to its depth and confined spaces. The wastewater undergoes treatment in two 2.4-acre facultative lagoons before being discharged via a gravity pipeline to Beaver Creek.

In terms of historical background and infrastructure evolution, the treatment system and lift station were established in the 1960s, while the levee surrounding the town was erected in the 1950s, which notably predates the sewage collection system. The collection system, initially laid out with vitrified clay piping, only saw segments replaced with more durable PVC. The lift station's force main underwent an upgrade to PVC approximately 20 years ago, suggesting occasional but significant investments in modernizing the infrastructure. Additional refurbishments, including the replacement of the wet well cover and the rehabilitation of pump and valve assemblies, were conducted in the early 2000s.

The surrounding area and resources are influenced by the operational capacity and efficiency of this wastewater system. Its ability to effectively manage and treat sewage impacts local environmental health, water quality in Beaver Creek, and overall community well-being. Without any projected improvements or updates to this system, the area is likely to experience continued challenges related to aging infrastructure, capacity constraints, and potential non-compliance with modern environmental and wastewater treatment standards. The integrity of the levee, coupled with the outdated collection system beneath it, poses additional risks of system failure or inefficiencies, likely exacerbating the town's vulnerability to flooding or sewage backflows during heavy rainfalls or flood events. These trends highlight the critical need for infrastructure upgrades or enhancements to ensure the long-term sustainability and resilience of the town's wastewater treatment capabilities.

Funding Information

Grant Number	HUD Program	Funding Amount
MT-CDBG-23-PF-02	Community Development Block Grant – Public Facilities	\$750,000

Estimated Total HUD Funded Amount: \$750,000

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
\$1,375,000**

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each

authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits or approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No FAA-designated civilian airports are located within 3,000 feet or military airfields within 2 ½ miles of the project site. See map (Appendix A).
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no Coastal Zones in Montana. A Search of the U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper Documentation shows confirmation. Therefore, the Act does not apply. See downloaded map documentation (Appendix B).
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	A FEMA floodplain map search for the Town was conducted using the FEMA Flood Map Service Center (https://msc.fema.gov/portal) for the Town area. The Town area is “not mapped,” however, a new flood plain study and mapping are currently being completed by DNRC and FEMA. According to the Milk River Watershed Flood Maps Update information found at the website, https://dnrc.mt.gov/Water-Resources/Floodplains/Floodplain-Mapping-Updates/Milk-River-Watershed-Flood-Maps-Update The DNRC Floodplain Outreach Specialist, Nadene Wadsworth, was contacted for input in the proposed wastewater project in relation to the floodplain. The Saco levee system was constructed in the early 1950s. The Town of Saco is responsible for maintaining and operating the levee system, which surrounds and protects the Town. The levee system has protected the Town from major floods over the years. Some long-standing Town residents report that some historical major

		<p>flooding events have risen to within just inches of the top of the existing levee.</p> <p>The project improvements are considering the flood plain elevations to set the rim and levee elevations above and provide sufficient freeboard for the improvements. A floodplain permit will be completed with the project.</p> <p>See Appendix C for the 8-Step process and other source documentation.</p>
--	--	--

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project does not involve new construction or the conversion of land use for the development of public, commercial, or industrial facilities, nor does it include five or more dwelling units. The project is not located in a non-attainment area.</p> <p>See the downloaded EPA data and HUD issued worksheet (Appendix D). Information also from website: https://www3.epa.gov/airquality/greenbook/ana_yo_mt.html</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A Search of the U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper Documentation shows confirmation that there is no Coastal Zones in the project location. Therefore, the Act does not apply.</p> <p>See downloaded map documentation (Appendix B).</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project explicitly does not involve the construction of single- or multi-family homes. Consequently, the regulations outlined in 24 CFR 58.5 and 24 CFR 50.3 are not applicable to this project. Additionally, an assessment was conducted to determine if any on-site or nearby toxic, hazardous, or radioactive substances (excluding radon) could potentially impact the health and safety of future occupants or interfere with the intended use of the property. Based on the findings, no such substances were identified that would warrant the application of these regulations. The source for this conclusion can be found at these websites: https://www.epa.gov/superfund/search-superfund-sites-where-you-live https://www.epa.gov/superfund/national-priorities-list-npl-sites-state#MT</p>

		See downloaded EPA data and HUD issued worksheet can be found in Appendix E.
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the Information for Planning and Consultation (IPaC) system (ipac.ecoshphere.fws.gov), which provides critical data for assessing environmental impacts, a comprehensive review under the Endangered Species Act has been conducted. The findings indicate that the project will not adversely affect any of the species identified by the determination key associated with this assessment. This conclusion is supported by a thorough evaluation of the potential interactions between the project activities and the habitats of these species, ensuring compliance with conservation regulations and safeguarding biodiversity.</p> <p>A copy of the United States Department of the Interior Species list of threatened and endangered species document (IPaC) and the HUD-issued worksheet is included in Appendix F.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The reconstruction of water mains and lagoon upgrades will not constitute the development of a hazardous facility involving the storage, handling, or processing of flammable or combustible chemicals such as bulk fuel storage facilities and refineries. Additionally, these activities do not include development, construction, rehabilitation that will increase residential densities, or conversion. The project is not subject to 24 CFR Part 51 C.</p> <p>See Appendix G for downloaded information, map and HUD issued worksheet.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Bowdoin clay is the primary soil in the Town and vicinity area. The NRCS Prime Farmland Soil Legend for Philips County area does not designate this soil as “farmland of statewide importance.”</p> <p>See maps and HUD issued worksheet in Appendix H.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A FEMA floodplain map search for the Town was conducted using the FEMA Flood Map Service Center (https://msc.fema.gov/portal) for the Town area.</p>

		<p>The Town area is “not mapped,” however, a new flood plain study and mapping are currently being completed by DNRC and FEMA. According to the Milk River Watershed Flood Maps Update information found at the website, https://dnrc.mt.gov/Water-Resources/Floodplains/Floodplain-Mapping-Updates/Milk-River-Watershed-Flood-Maps-Update</p> <p>The DNRC Floodplain Outreach Specialist, Nadene Wadsworth, was contacted for input in the proposed wastewater project in relation to the floodplain.</p> <p>The Saco levee system was constructed in the early 1950s. The Town of Saco is responsible for maintaining and operating the levee system, which surrounds and protects the Town. The levee system has protected the Town from major floods over the years. Some long-standing Town residents report that some historical major flooding events have risen to within just inches of the top of the existing levee.</p> <p>The project improvements are considering the flood plain elevations to set the rim and levee elevations above and provide sufficient freeboard for the improvements. A floodplain permit will be completed with the project.</p> <p>See Appendix B for the 8-Step process and other source documentation.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Montana State Historic Preservation Office (SHPO) was contacted to determine whether there are significant historical and cultural resources within the project area. A response from SHPO was obtained. The letter states that any structure over fifty years of age is considered historic and potentially eligible for listing the Nation Register or Historic Places. SHPO states “<i>we feel that there is a low likelihood cultural properties will be impacted. We, therefore, feel that a recommendation for a cultural resource inventory is unwarranted at this time.</i>”</p> <p>See Appendix I for source documentation and HUD-issued worksheet.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The determination regarding the Saco wastewater improvements project indicates that the project involves the replacement of wastewater collection mains and some minor upgrades to the lagoon system (Please see the</p>

<p>Communities Act of 1978; 24 CFR Part 51 Subpart B</p>		<p>Saco Wastewater 2022 PER, and 2024 Design Report). Importantly, it does not include any new construction or rehabilitation of residential properties. As a result, the project is not subject to Title 24 CFR 51 Subpart B, which pertains to certain environmental considerations related to housing. This implies that the project is focused solely on infrastructure improvements without impacting residential land use or development.</p> <p>See Appendix J for the HUD-issued worksheet.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project locations are not near a Sole Source Aquifer, therefore, the Safe Drinking Water Act of 1974 and 40 CFR Part 149 regulations do not apply. Information was gathered from this website: https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b</p> <p>A map of the area and the HUD-issued worksheet can be seen in Appendix K.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The US Fish and Wildlife Service Wetlands Mapper (www.fws.gov/wetlands/data/Mapper.html) was used to determine the presence of wetlands within the planning area. See Appendix K for a figure presenting the aerial extent of mapped wetlands in the area. Some areas classified as freshwater emergent wetlands appear to intermittently follow Beaver Creek and along highway roadside ditches. As the project takes place in the footprint of the original areas, a wetland will not be impacted in terms of E.O. 1190's definition of new construction.</p> <p>See Appendix L for a downloaded map and the HUD-issued worksheet.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the detailed information available on rivers.gov/montana, the designated project locations in Saco are situated at a considerable distance from any National Wild and Scenic River. This indicates that these sites do not fall within the protected areas recognized for their outstanding natural beauty and recreational value, allowing for the potential development of the project without immediate environmental concerns related to these designated rivers.</p> <p>See Appendix M for a downloaded map and the HUD-issued worksheet.</p>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]
Recorded below is the qualitative and quantitative significance of the effects of the proposal on

the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The site is in an already developed area, and residential use is compatible with the surrounding land uses. The project sites are already on developed areas, with no residential properties directly on the project sites. (Town of Saco, and Matt Mudd, PE, Great West Engineering (406) 495-6196)
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project site contains 0 to 2 percent slopes. The project does not require unusual excavation and fill activity. Soil is acceptable for the project. Refer to the Soil Map – Saco, MT map (Appendix G). Minor erosion during construction will be controlled by the contractor (Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Hazards and Nuisances including Site Safety and Noise	2	Saco does not have any EPA Superfund sites. The project will not generate a substantial increase in traffic. Noise from project construction activities is temporary and separated from existing residential development. (Matt Mudd, PE, Great West Engineering, (406) 495-6196) Appendix F.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The initiative is independent of any direct connections to employment trends or income distribution patterns. It does not focus on employment opportunities, wages, or economic stability. Instead, it aims to address other factors that may influence the community or organization without examining how job availability or income levels affect its outcomes. (Matt Mudd, PE, Great West Engineering, (406) 495-6196)

Demographic Character Changes, Displacement	2	The proposed projects align seamlessly with the existing land uses in the area, ensuring that there will be no significant alterations to the demographic profile or the overall character of the neighborhood. The site in question is already developed, featuring fully operational wastewater management systems that are effectively integrated into the current infrastructure. This pre-existing functionality minimizes any potential environmental impact and supports the project's sustainability goals, reinforcing the compatibility of the new developments with the surrounding community. (Matt Mudd, PE, Great West Engineering, (406) 495-6196)
---	---	---

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The designated area for the project is already equipped to accommodate the existing residents of the Town effectively. Given the demographics of the current population, we do not anticipate any significant rise in the number of school-aged children resulting from this development. This means that the local schools are adequately serving the needs of the community as it stands, and the project will not create additional demand for educational resources or infrastructure. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Commercial Facilities	2	The proposed project is carefully designed to avoid any negative repercussions on the current retail and commercial landscape. This means that local businesses will not encounter unfair competition or the risk of being pushed out of their locations because of the initiative. By strategically planning the project's development and operations, we aim to maintain a healthy and thriving business environment. Additionally, the project will ensure that existing enterprises continue to flourish, allowing them to serve their customers without disruption or disadvantage. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Health Care and Social Services	2	The nearest health care facility to the project's location is situated approximately 27.6 miles away, making access to medical services somewhat challenging for individuals in the area. While the project's outcome holds promise for improving community well-being, the availability of Health Care and Social Services remains limited. Residents may find it difficult to obtain timely and adequate medical attention, which highlights a significant gap in health resources in the vicinity. As a result, the lack of nearby health services would not impact the overall effectiveness of the project's positive outcomes. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Solid Waste Disposal / Recycling	2	Phillips County handles solid waste. Residents are responsible for hauling it to the transfer site, which is located south of the Town. The county then hauls the trash to Glasgow. The project involves rehabilitating an existing structure, and no new uses are planned; therefore, the solid waste is neutral. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)

Waste Water / Sanitary Sewers	1	<p>The existing wastewater system consists of a network of gravity sewer mains that generally direct flow from the Town core, south across US 2 and the BNSF railroad tracks to the community lift station and to the treatment lagoons. There is also an existing residential service area on the south side of Town that conveys sewage to the lift station. The overall Town's sewer system consists of a clay collection piping system, a primary sewage lift station with a force main to the treatment system, a 2-cell facultative lagoon treatment system, and an effluent discharge piping system. The existing lagoon consists of cells that are about 2.4-acres each. The estimated sewage generation is within the existing capacity of the sewers and treatment facilities, and the stormwater is separated from the sewage collection system. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)</p>
Water Supply	2	<p>The wastewater improvements project in Saco is designed to operate independently from the town's water supply system, preventing any negative impact on existing infrastructure. The water supply comes from two wells located nine miles northwest, which draw from a semi-confined aquifer.</p> <p>These wells, at depths of 68 and 72 feet, include steel casing and gravel screening to protect groundwater quality. While the aquifer has moderate contamination sensitivity, it is robust due to local precipitation recharge.</p> <p>The project focuses on enhancing wastewater treatment and management without affecting groundwater recharge areas. By following strict regulatory standards and best practices, Saco aims to protect its water resources while effectively addressing wastewater needs, ensuring the town's water supply remains safe and efficient. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The Town of Saco Volunteer Fire Department provides fire protection for the Town. There are currently 12 volunteer members. The department currently has one certified Emergency Medical Technician (EMT), and another member is working on the EMT certification. The Phillips County Ambulance Service provides Emergency Medical Service (EMS) service to Saco but works closely with the fire department in the event of an emergency. The wastewater project will not adversely impact these services. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)</p>
Parks, Open Space and Recreation	2	<p>The Town of Saco operates and maintains two park facilities. The wastewater project is not located near either of these parks and will have no adverse effects. (Town of Saco, and Matt Mudd, PE, Great West Engineering, (406) 495-6196)</p>
Transportation and Accessibility	2	<p>The project aims to replace and rehabilitate existing infrastructure without negatively affecting transportation and accessibility in the town. Currently, Saco lacks a transportation system that caters specifically to its elderly and disabled residents. The area suffers from insufficient and unsafe public transportation options, fails to support pedestrian movement, and lacks dedicated bicycle lanes or trails. However, it is important to highlight that there are no barriers preventing emergency vehicles from accessing the area.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project will not alter unique natural features. There are no agricultural lands affected. The project site is not subject to rapid water withdrawal problems. There are no visual or other indications of water quality problems on or near the project site. The project will not involve discharge of sewage effluent into surface water bodies. The project does involve an increase in impervious surface area, which will comply with Town storm water requirements. (Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Vegetation, Wildlife	2	The project will be developed on Town-owned property, which has already been developed. (Matt Mudd, PE, Great West Engineering, (406) 495-6196)
Other Factors		

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Energy Efficiency	2	The upcoming project focused on the replacement and rehabilitation of essential infrastructure is designed with sustainability in mind, ensuring that it will not lead to any increase in the town's overall energy consumption. This initiative aims to modernize existing systems while implementing energy-efficient technologies and practices. By prioritizing eco-friendly solutions, the project seeks to maintain the town's current energy usage levels, thereby supporting our commitment to environmental stewardship and community well-being. (Matt Mudd, PE, Great West Engineering, (406) 495-6196)

Additional Studies Performed:

- Geotechnical Engineering Reconnaissance Report, Saco Levee Feasibility Study, Saco, MT (January 2025)

Field Inspection (Date and completed by):

- June 17, 2025, Matt Mudd, P.E., Great West Engineering

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Department of Commerce, Census and Economic Information Center

- Department of Labor and Industry
- Department of Environmental Quality
- Department of Fish, Wildlife and Parks
- Department of Natural Resources and Conservation
- Department of Transportation
- State Historic Preservation Office
- US Environmental Protection Agency
- US Fish and Wildlife Service
- US Forest Service
- US Army Corps of Engineers
- National Park Service
- Federal Aviation Administration
- Bureau of Land Management
- Bureau of Indian Affairs
- Natural Resource Conservation Service
- Occupational Safety and Health Administration
- US Department of Transportation
- Department of Natural Resources and Conservation Water Resources Regional Office

List of Permits Obtained:

- Montana Department of Transportation (MDT) Utility Occupancy Permit
 - Permit number 00002/20250124/37920/43272
- BNSF Railway Company
 - Permit number 25w-23883
- USACE permit
 - Currently awaiting permit approval. Permit was submitted on June 9, 2025.
- Floodplain Permit
 - Permit will be submitted upon DEQ design approval, anticipated October of 2025.

Public Outreach [24 CFR 50.23 & 58.43]:

- Public Hearing – Wastewater Preliminary Engineering Report, April 13, 2022 (<https://sacoinfrastructure.com/download-project-documents/>)
- Public Hearing – Town of Saco to Apply for CDBG Grant Funding, March 15, 2023 (<https://sacoinfrastructure.com/download-project-documents/>)
- Public Hearing – Town of Saco wastewater system, September 13, 2023 (<https://sacoinfrastructure.com/download-project-documents/>)
- Public Website – <https://sacoinfrastructure.com/>
- Public Notice – Early Notice and Public Review of Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain, August 6, and 13, 2025 (Appendix B)
- Public Notice – Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain, August 27, 2025 (Appendix B)

Cumulative Impact Analysis [24 CFR 58.32]:

The Saco Wastewater Improvements project entails the replacement of wastewater collection mains and minor upgrades to the lagoon system. It does not involve new construction or changes in land use for public, commercial, or industrial facilities, nor does it include the construction of five or more dwelling units. Additionally, the project is located outside of a non-attainment area.

A thorough assessment of potential toxic, hazardous, or radioactive substances was conducted, revealing no such materials that could impact health or safety. This conclusion is supported by data from specified sources, meaning that the relevant regulatory standards cannot be applied due to the absence of hazardous materials. Furthermore, an extensive review under the Endangered Species Act confirmed that the project will not adversely affect any species identified by conservation regulations, based on a comprehensive analysis of potential interactions between project activities and local habitats.

In terms of soil and floodplain analysis, the primary soil in the vicinity is Bowdoin clay, which is classified by the NRCS as not being "farmland of statewide importance." A FEMA floodplain map search indicates that the area is "not mapped," but highlights ongoing studies and mapping efforts regarding floodplain management. The historical data demonstrate that a levee system constructed in the 1950s has effectively protected the Town from flooding; however, concerns exist regarding historical major flooding events that reportedly reached near the top of the levee. To address these concerns, the project design considers floodplain elevations to ensure that improvements maintain adequate freeboard above flood levels.

Engagement with the Montana State Historic Preservation Office (SHPO) confirmed a low likelihood of impacts to significant cultural properties. Structures over fifty years old may qualify for historical consideration, yet the SHPO determined that a cultural resource inventory is not necessary at this time.

In conclusion, the Saco Wastewater Improvements project reflects a careful approach to environmental compliance, risk assessment, and cultural sensitivity. The cumulative impacts of upgrading the wastewater system are minimal, ensuring that community health, safety, and historical integrity are preserved while addressing essential infrastructure needs. The project fulfills regulatory requirements and positions the Town of Saco for improved wastewater management without adverse environmental or cultural effects.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

For a more in-depth analysis of the alternatives considered, please refer to the 2022 Saco Wastewater PER.

Collection System Alternatives:

The overall sewer collection system alternatives considered in the PER include:

- C-1 – Phase 1 Collection System Improvements. This alternative includes the replacement of about 1000-feet of sewer line.
- C-2 – Phase 2 Collection System Improvements. This alternative includes the continued replacement of sewer collection pipelines and the associated manholes.
- C-3 – Phase 3 Collection System Improvements. This alternative includes additional clay piping in Town. The phase three project may be further split into sub-phases (Phase 3A and 3B) to make the projects more affordable for the Town by taking advantage of available grants.
- C-4 – Phase 4 Collection System Improvements. This alternative includes replacing the remainder the clay collection system piping in Town.

Treatment Alternatives:

The overall treatment system alternatives considered in the PER are listed below. All lagoon improvement alternatives include sludge removal and disposal.

- T-1 – Reconstruct Lagoons with UV Treatment.
 - This alternative includes the complete reconstruction of the existing lagoons and installation of a UV building and system
- T-2: Total Retention System

- This alternative includes the reconstruction of the existing lagoon and construction of an additional lagoon to meet storage and evaporation requirements. No UV system is needed as the system is non-discharging.
- T-3: Minor Lagoon Upgrades with Irrigation
 - This alternative includes miscellaneous upgrades to the existing lagoon system including replacing the influent control valve, slope embankments and rip rap, and installing a supplemental irrigation system for irrigation on available nearby crop lands.
- T-4: Minor Lagoon Upgrades with UV Treatment
 - Similar to T-3, this alternative includes miscellaneous upgrades to the existing lagoon system including replacing the influent control valve, slope embankments and rip rap. However, E. coli is dealt with by installing a UV treatment system.
- T-5: Minor Lagoon Upgrades Only
 - This alternative would only include minor upgrade to the lagoon similar to T-3 and T-4. However, with the focus of improvements on replacing more piping and providing I&I reductions, reduced influent flows would give the Town more flexibility to hold the treated water in the storage cell, and discharge only at times when the effluent is pretested and verified to meet permit limits.
- T-6: UV Treatment System Only
 - This alternative would include only the installation of a new UV treatment system done as a stand-alone and independent project from any other lagoon treatment improvements. This alternative could be completed with or without other lagoon treatment upgrades.

No Action Alternative [24 CFR 58.40(e)]:

Collection System: No action may be considered an alternative in order to save immediate cost. This alternative is not viable considering the extensive problem of the collection system with damaged, sagging, cracking piping, and resulting significant I&I intrusion. Long-term O&M costs will increase if the condition of the collection system is left unaddressed.

Treatment System: The No Action Alternative means no improvements would be made to the existing treatment system. This is an option to minimize capital costs. However, degradation of surface water resources will continue without improvements to the wastewater treatment facilities. The existing facility will also continue to require increasing maintenance and attention and will cease to provide adequate treatment. Sludge will continue to accumulate and reduce effective treatment capacity to effectively treat for BOD and TSS.

Secondary standards are intended to measure the effectiveness of wastewater treatment to protect public health. The current system discharges to Beaver Creek and experiences periodic violations for BOD and TSS and will need disinfection to meet E. coli limits.

Summary of Findings and Conclusions:

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible

for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	The lagoon improvements will consider flood plain elevations to set the rim elevations above and provide sufficient freeboard for the improvements. A floodplain permit request will be submitted upon the design approval around October of 2025.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: Kasia Bothman-Little Date: 3/27/2026

Name/Title/Organization: Kasia Bothman-Little, Grant Administrator and Compliance Specialist, Great West Engineering

Certifying Officer Signature: Wayne Woodall Date: 4-1-2026

Name/Title: Wayne Woodall, Mayor

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

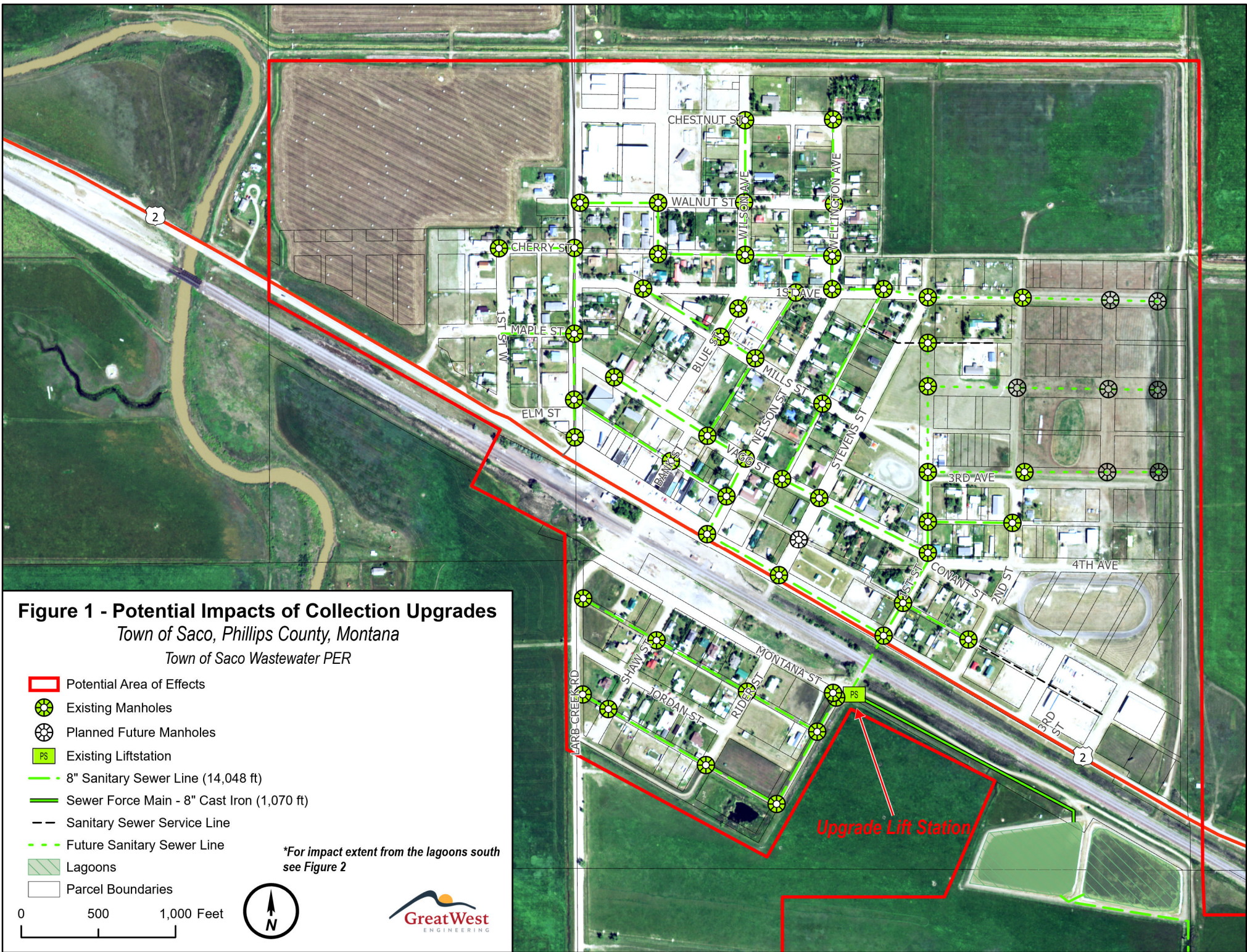






Figure 1 - Potential Impacts of Collection Upgrades

Town of Saco, Phillips County, Montana

Town of Saco Wastewater PER

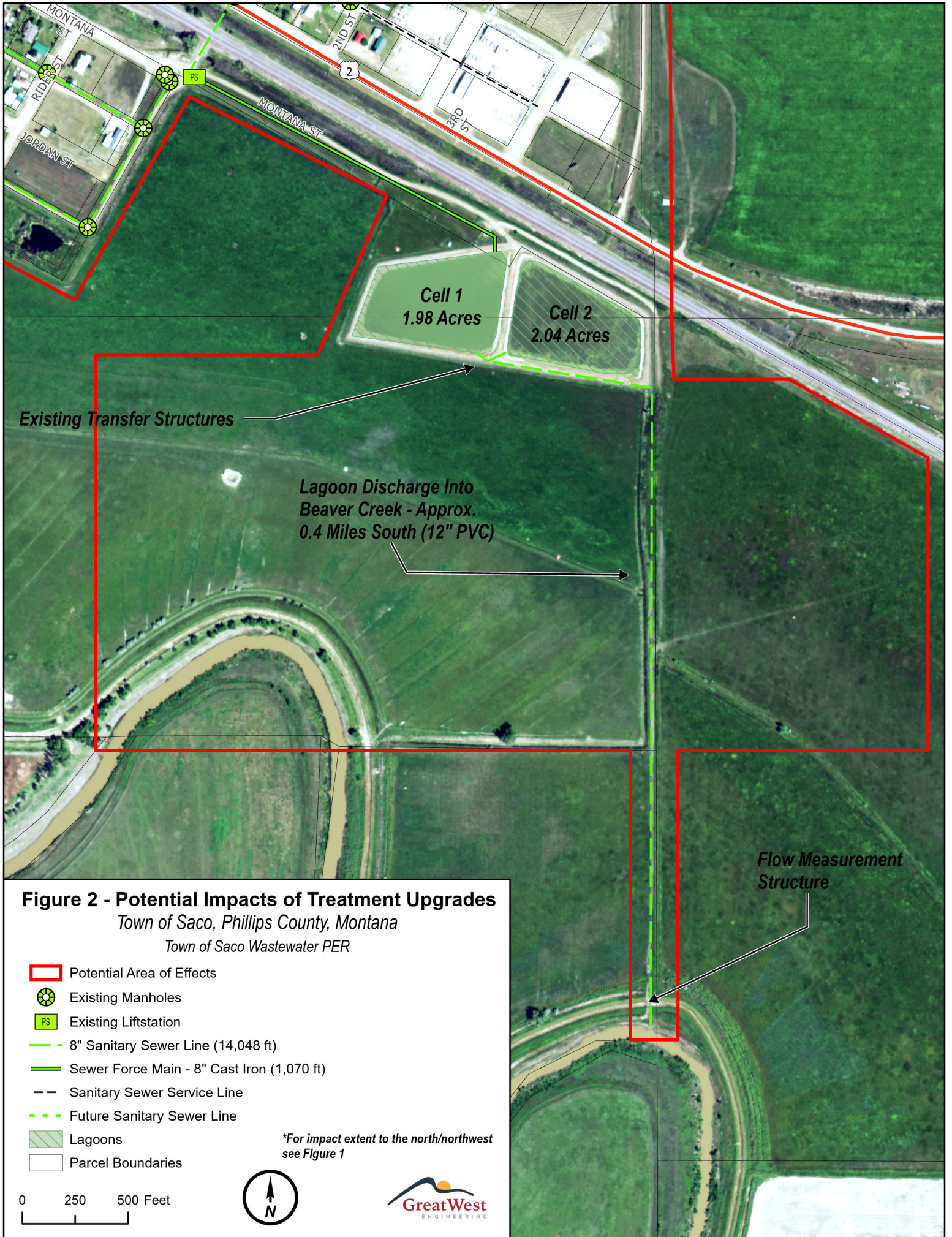
- ▭ Potential Area of Effects
-  Existing Manholes
-  Planned Future Manholes
- PS Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- - - Future Sanitary Sewer Line
-  Lagoons
-  Parcel Boundaries

**For impact extent from the lagoons south see Figure 2*

0 500 1,000 Feet

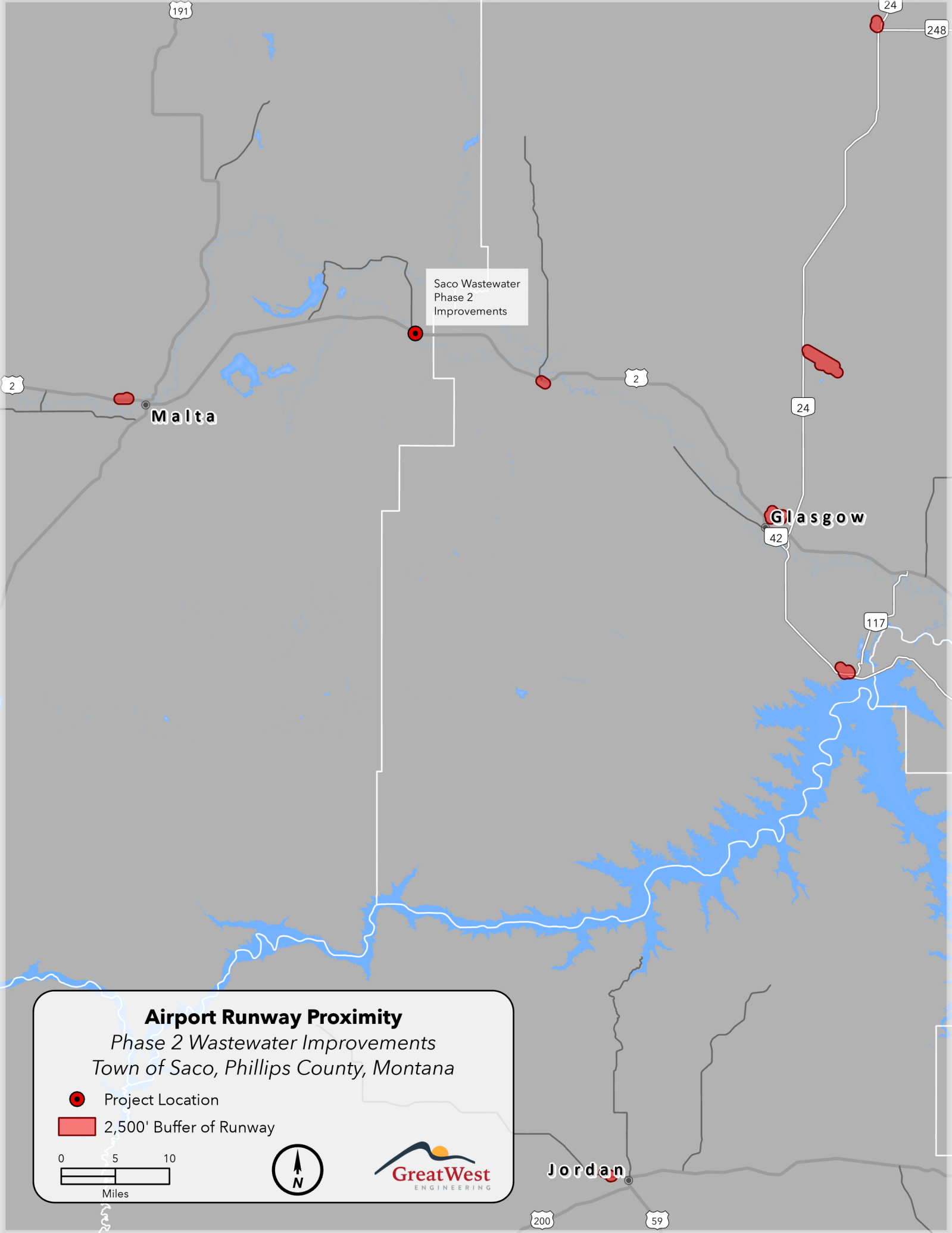


Upgrade Lift Station



APPENDIX A

Airport Hazards



Saco Wastewater
Phase 2
Improvements

Malta

Glasgow

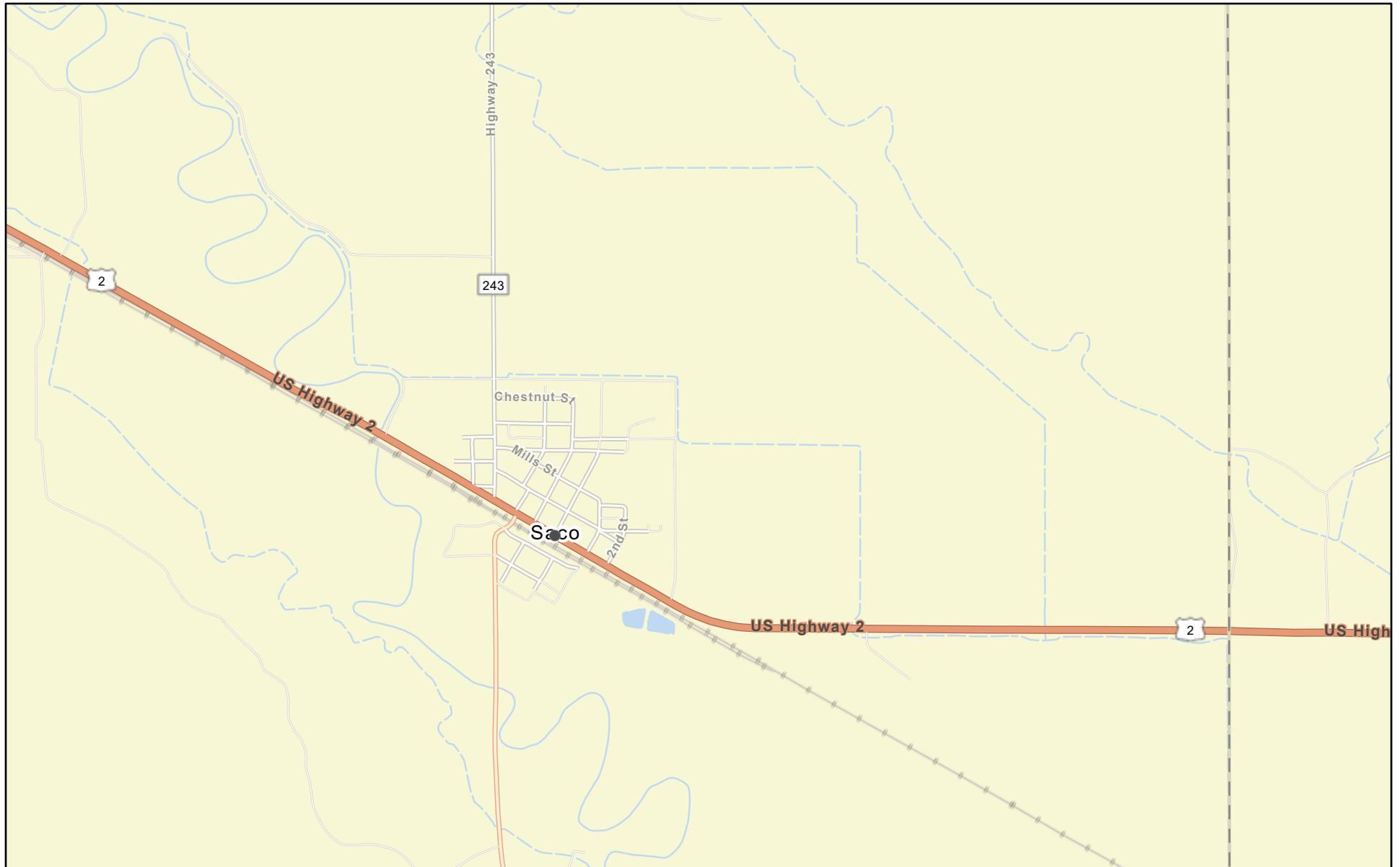
Jordan

Airport Runway Proximity
*Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana*

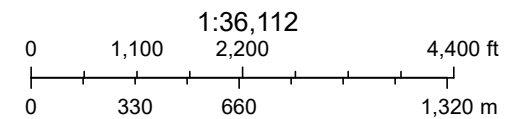
- Project Location
- 2,500' Buffer of Runway

0 5 10
Miles

UAS Facility Map - Saco



3/11/2026, 9:54:12 AM



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Web AppBuilder for ArcGIS

Airport Hazards (CEST and EA)

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D
References		
https://www.hudexchange.info/environmental-review/airport-hazards		

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

Explain how you determined that the project is consistent:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

Project is not consistent with DOD guidelines, but it has been approved by Certifying Officer or HUD Approving Official.

Explain approval process:

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

No FAA-designated civilian airports are located within 3,000 feet or military airfields within 2 ½ miles of the project site. See map in Appendix A.

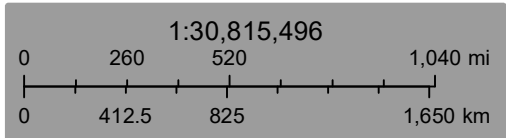
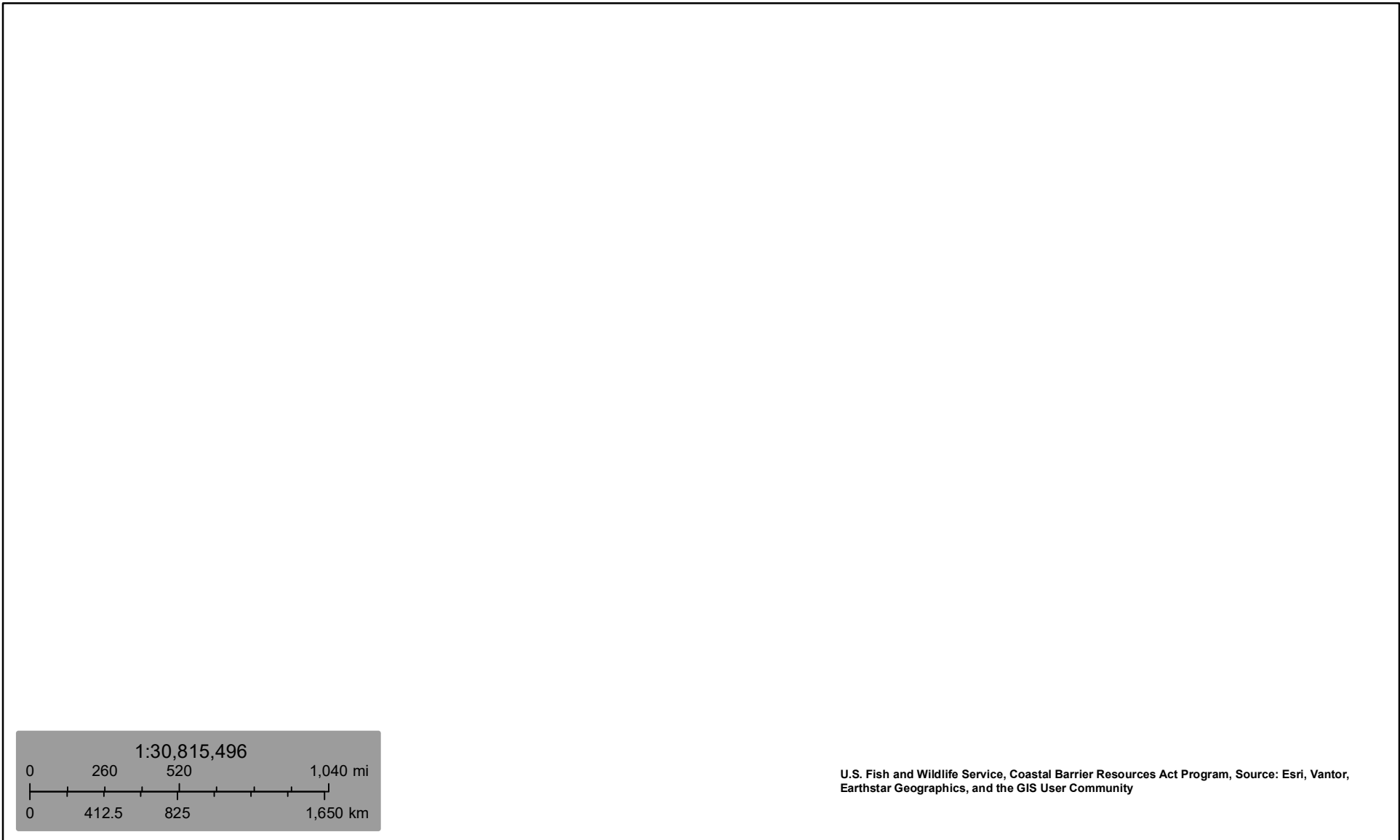
Are formal compliance steps or mitigation required?

Yes

No

APPENDIX B

Coastal Resources



U.S. Fish and Wildlife Service, Coastal Barrier Resources Act Program, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community

March 27, 2026

Generalized Units

This map is for general reference only. The Coastal Barrier Resources System (CBRS) boundaries depicted on this map are representations of the controlling CBRS boundaries, which are shown on the official maps, accessible at <https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>. All CBRS related data should be used in accordance with the layer metadata found on the CBRS Mapper website.

The CBRS Buffer Zone represents the area immediately adjacent to the CBRS boundary where users are advised to contact the Service for an official determination (<https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>) as to whether the property or project site is located "in" or "out" of the CBRS.

CBRS Units normally extend seaward out to the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward

Coastal Barrier Resources System Mapper Documentation

U.S. Fish and Wildlife Service, Coastal Barrier Resources Act Program, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community

0 65 130 260 390 ft 1:4,514

-107.341505, 48.45562

The pin location displayed on the map is a point selected by the user. Failure of the user to ensure that the pin location displayed on this map correctly corresponds with the user supplied address/location description below may result in an invalid federal flood insurance policy. **The U.S. Fish and Wildlife Service (Service) has not validated the pin location with respect to the user supplied address/location description below. The Service recommends that all pin locations be verified by federal agencies prior to use of this map for the provision or denial of federal funding or financial assistance.** Please note that a structure bisected by the Coastal Barrier Resources System (CBRS) boundary (i.e., both "partially in" and "partially out") is within the CBRS and therefore affected by CBRA's restrictions on federal flood insurance. A pin placed on a bisected structure must be placed on the portion of the structure within the unit (including any attached features such as a deck or stairs).

User Name: Town of Saco
User Supplied Address/Location Description: Town of Saco Phase 2 Wastewater Improvements
Pin Location: Outside CBRS
Pin Flood Insurance Prohibition Date: N/A
Pin System Unit Establishment Date: N/A

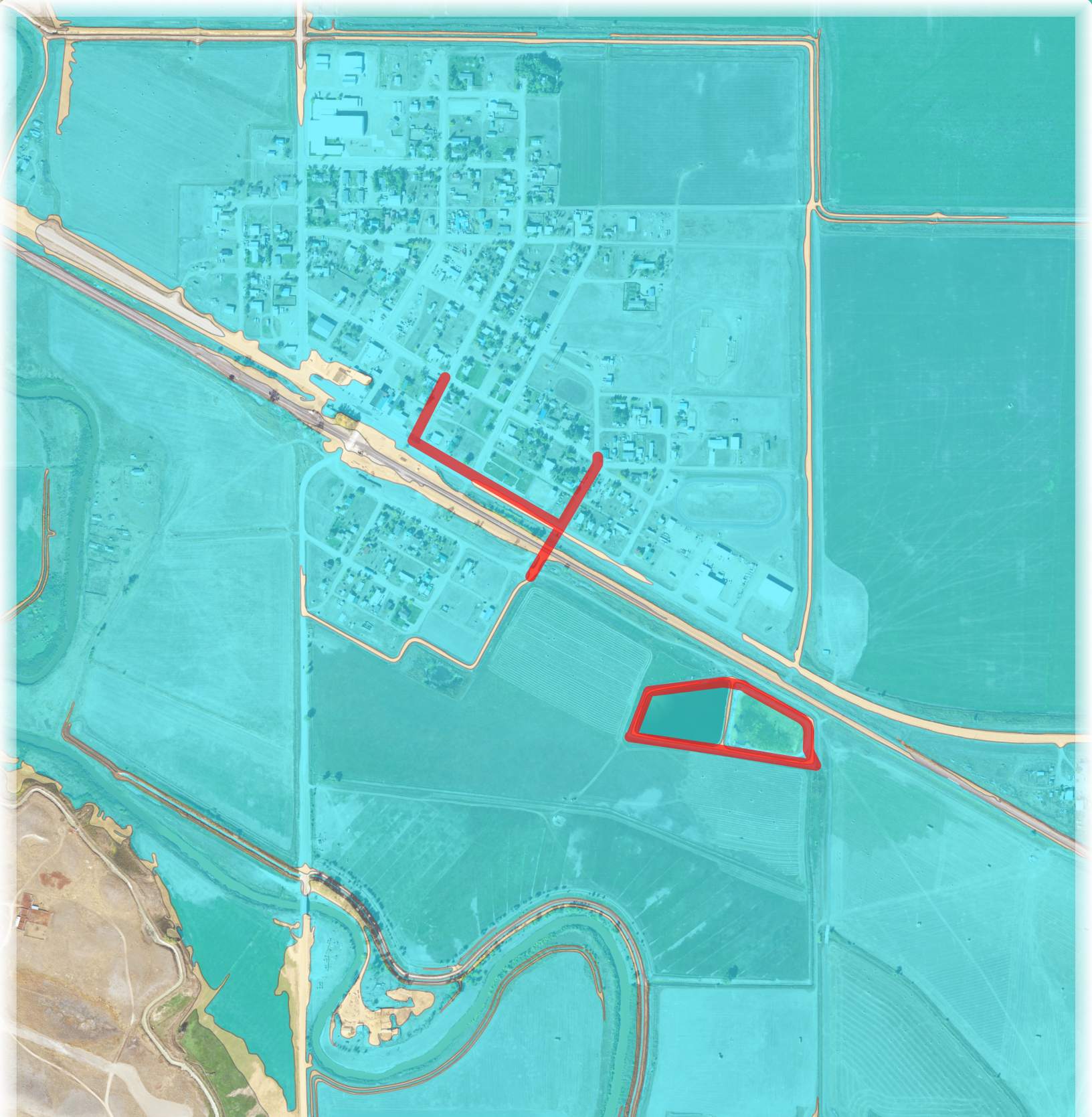
The user placed pin location is not within the CBRS. The official CBRS maps are accessible at <https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>.

The CBRS information is derived directly from the CBRS web service provided by the Service. This map was exported on 3/27/2026 and does not reflect changes or amendments subsequent to this date. The CBRS boundaries on this map may become superseded by new boundaries over time.

This map image may be void if one or more of the following map elements do not appear: basemap imagery, CBRS unit labels, prohibition date labels, legend, scale bar, map creation date. For additional information about flood insurance and the CBRS, visit: <https://www.fws.gov/node/263838>.

APPENDIX C

Floodplain

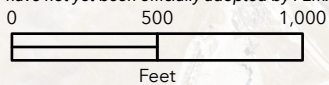


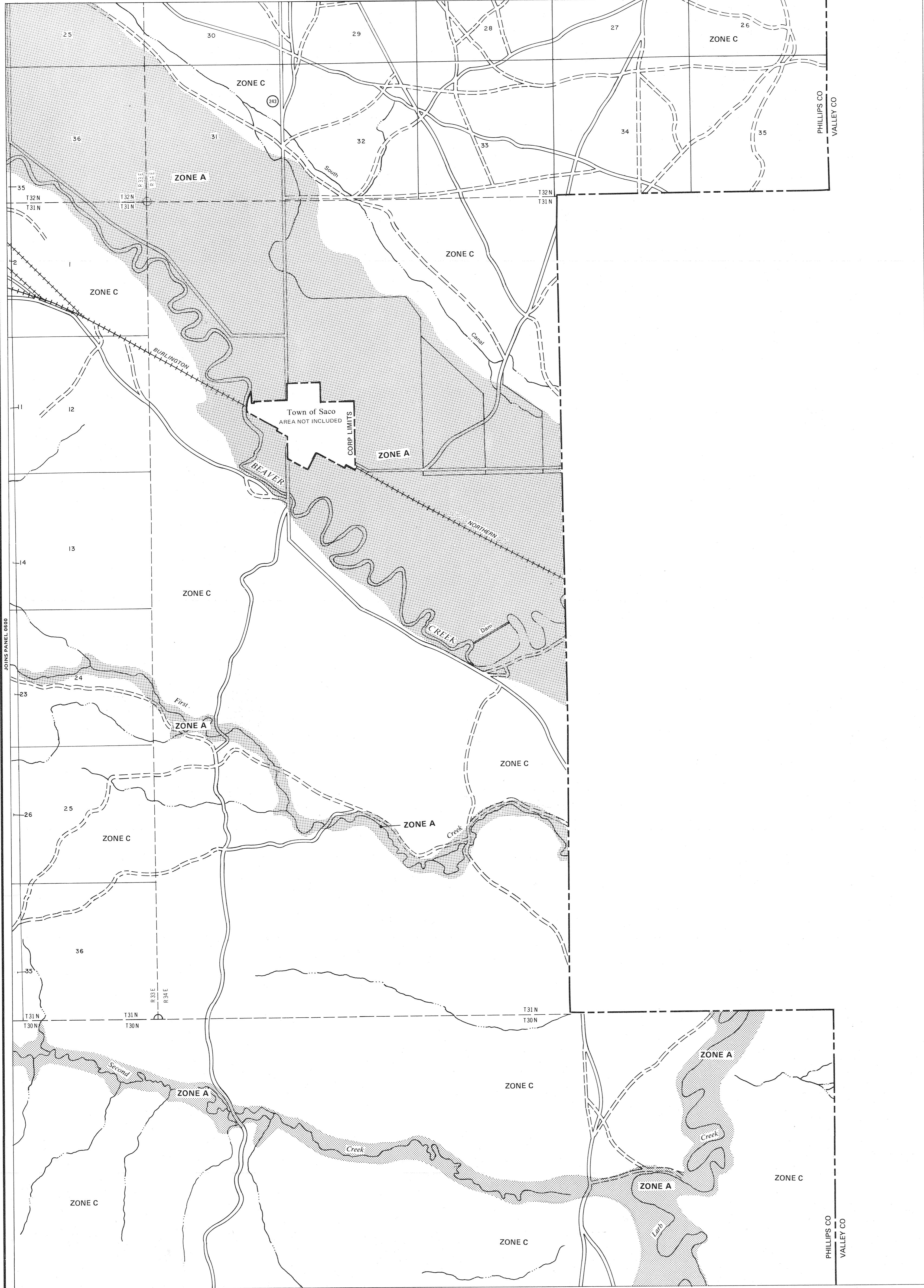
Floodplain - FEMA, Draft as of June 2025

*Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana*

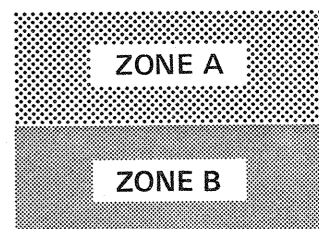
- Zone AE - 1% Annual Flood Chance
- Zone X - 0.2% Annual Flood Chance
- Phase 2 Improvement Project Location

Floodplains are not regulatory and
have not yet been officially adopted by FEMA





KEY TO MAP



SPECIAL FLOOD HAZARD AREA

- Base Flood Elevation Line With Elevation In Feet** 513
- Base Flood Elevation in Feet Where Uniform Within Zone** (EL 987)
- Elevation Reference Mark RM7x
- Zone D Boundary
- River Mile M1.5

**Referenced to the National Geodetic Vertical Datum of 1929

EXPLANATION OF ZONE DESIGNATIONS

ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
A0	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.
AH	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.
 This map is for use in administering the National Flood Insurance Program; it does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size, or all planimetric features outside special flood hazard areas.
 Coastal base flood elevations apply only landward of the shoreline shown on this map.
 For adjoining map panels, see separately printed Index To Map Panels.

INITIAL IDENTIFICATION:
 FEBRUARY 7, 1978

FLOOD HAZARD BOUNDARY MAP REVISIONS:
 NONE

FLOOD INSURANCE RATE MAP EFFECTIVE:
 MAY 19, 1987

Refer to the FLOOD INSURANCE RATE MAP EFFECTIVE date shown on this map to determine when actuarial rates apply to structures in the zones where elevations or depths have been established.
 To determine if flood insurance is available in this community, contact your insurance agent, or call the National Flood Insurance Program, at (800) 638-6620.



APPROXIMATE SCALE IN FEET
 2000 0 2000

NATIONAL FLOOD INSURANCE PROGRAM

FIRM
 FLOOD INSURANCE RATE MAP

PHILLIPS COUNTY,
 MONTANA
 (UNINCORPORATED AREAS)

PANEL 625 OF 1450
 (SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
 300162 0625 B

EFFECTIVE DATE:
 MAY 19, 1987



Federal Emergency Management Agency

DOCUMENTATION OF 8-STEP PROCESS FOR FLOODPLAINS

Decision Process for E.O. 11988 as Provided by 24 CFR §55.20

Town of Saco
110 Nelson Street
Saco, MT 59261

Project Name: Town of Saco Wastewater System Improvements – Phase 2

Contract #: MT-CDBG-23-PF-02

Project Description: The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades.

The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St..

The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion.

Step 1: Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions) or wetland.

Based on the Town of Saco's documentation, this action is located in the 100-year floodplain. The pipes, manholes, and services replacement are inside of the 100-year floodplain as indicated on Flood Insurance Rate Map (FIRM) Panel 3001620625B, revised May 19, 1987. The FIRM is attached to this document. However, the U.S. Department of Housing and Urban Development has requested an 8-step process for this project.

This project does not involve (a) acquisition of property, (b) demolition, or (c) new construction of affordable multifamily housing of greater than four units and, for these reasons, E.O. 11988- Floodplain Management and E.O. 11990- Wetlands Protection do not apply. This project is located inside the 100-year floodplain and is a critical action, therefore, the Town of Saco is performing the 8-step analysis to comply with HUD guidance provided to the MT Department of Commerce. This project is in the floodplain, and it meets the exceptions at 24 CFR 55.12.

Step 2: Notify the public for early review of the proposal and involve the affected and interested public in the decision making process.

The Early Notice and Public Review of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain was published on August 6, 2025 and August 13, 2025. No comments were received during this time.

The Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain was published on August 27, 2025. No comments were received during this time.

Step 3: *Identify and evaluate practicable alternatives.*

The alternatives analysis below describes the proposed improvements for the existing wastewater collection and treatment systems in Saco. The current clay collection system has been documented as deficient, posing significant health, sanitation, and security risks. Following an extensive video inspection, specialists identified the aging collection system as one of the poorest in condition. The lagoon berms are eroding and need minor earthwork to rebuild, along with the reparation of any missing riprap protection.

To bring the system up to date, upgrade the leaking clay collection system, and repair the lagoon berm, all 1,700 feet of pipe should be replaced (including associated manholes and services), the new sewer main should be rehabilitated, and the earthwork on the berms should be completed. The evaluation and summary of the recommended improvements will be discussed further, and the alternatives evaluation will be completed with the goal of meeting the following criteria:

- Replacement and installation of up to 1,700 feet of pipe, including associated manholes and services, from the lift station location, extending north under the highway, and extending to the intersection of Vagg Street and 4th Avenue.
- Rehabilitation of a new sewer main located within Nelson Street, from Taylor Street to Vagg Street.
- Reparation of the lagoon berms, including earthwork operations, and the completion of any missing riprap protection.

The alternatives screening process considered several collection system alternatives. Of these alternatives, the following collection systems were selected for detailed analysis:

- No Action Alternative: No action may be considered an alternative in order to save immediate cost. This alternative is not viable considering the extensive problem of the collection system with damaged, sagging, cracking piping, and resulting significant I&I intrusion. Longterm O&M costs will increase if the condition of the collection system is left unaddressed.

- Alternative C-1 – Phase 1 Collection System Improvements

This alternative includes initial/partial open cut replacement of the existing clay piping and manholes to fix the sagging, cracked and deteriorating collection system. Phasing of collection system improvements allows the Town to maximize available funding to develop a more affordable project, and limit rate impacts to users.

- Alternative C-2 – Phase 2 Collection System Improvements

This alternative includes partial open cut replacement of the existing clay piping and manholes to fix the sagging, cracked and deteriorating system. Phase 2 collection system improvements include costs for the replacement and installation of up to 1,300 feet of pipe manholes from the lift station, the highway and railroad crossing to the alley between Vagg Street and US 2, and installation of new sewer main in the alley from 1st Street to Nelson Street This phase also includes the abandonment of the pipe along Highway 2 (Taylor Street) and movement of this segment north to the alley. Only two services are located along this section due to the park site. These will be redirected to the alley with the proposed project. This phase includes the bore and jack replacement of collection pipe running under US 2 and the BNSF Railroad.

- Alternative C-3 – Phase 3 Collection System Improvements

Phase 3 collection system improvements include the final phase of collection system upgrades. The phase three project may be further split into sub-phases to make the projects more affordable for the Town and to reduce potential rate impacts by taking

advantage of available grants offered each cycle. The scope of a future Phase 3 project and grant application can be evaluated in more detail following the completion of the Phase 2 Project. A PER Amendment may be required to accommodate a future grant application and account for new information and costs. The Phase 3 project includes the replacement of pipe and manholes south of the railroad track, as well as segments along Mill Street, alleys between Blue Street and Stevens Street, 1st Street to 3rd Avenue, and an alley between 1st and 2nd Streets.

- Alternative C-4 – Phase 4 Collection System Improvements

This alternative includes replacing the remainder of the clay collection system piping in Town.

The alternatives screening process considered many wastewater treatment alternatives. The Town prefers operational simplicity for treatment system upgrades. Five potential alternatives were selected for a detailed analysis. All these alternatives include sludge removal and disposal.

- No Action Alternative: The No Action Alternative means no improvements would be made to the existing treatment system. This is an option to minimize capital costs. However, degradation of surface water resources will continue without improvements to the wastewater treatment facilities. The existing facility will also continue to require increasing maintenance and attention and will cease to provide adequate treatment. Sludge will continue to accumulate and reduce effective treatment capacity to effectively treat for BOD and TSS. Secondary standards are intended to measure the effectiveness of wastewater treatment to protect public health. The current system discharges to Beaver Creek and experiences periodic violations for BOD and TSS and will need disinfection to meet E. coli limits. Therefore, this report will not consider the No Action Alternative further.

- Alternative T-1 – Reconstruct Lagoons with UV Treatment.

This alternative includes the complete reconstruction of the existing lagoons and installation of a UV building and system.

- Alternative T-2: Total Retention System

This alternative includes the reconstruction of the existing lagoon and construction of an additional lagoon to meet storage and evaporation requirements. No UV system is needed as the system is non-discharging.

- Alternative T-3: Minor Lagoon Upgrades with Irrigation

This alternative includes miscellaneous upgrades to the existing lagoon system including replacing the influent control valve, slope embankments and rip rap, and installing a supplemental irrigation system for irrigation on available nearby croplands.

- Alternative T-4: Minor Lagoon Upgrades with UV Treatment

Similar to T-3, this alternative includes miscellaneous upgrades to the existing lagoon system including replacing the influent control valve, slope embankments and rip rap. However, E. coli is dealt with by installing a UV treatment system.

- Alternative T-5: Minor Lagoon Upgrades Only

This alternative would only include minor upgrade to the lagoon similar to T-3 and T-4. However, with the focus of improvements on replacing more piping and providing I&I reductions, reduced influent flows would give the Town more flexibility to hold the treated water in the storage cell, and discharge only at times when the effluent is pretested and verified to meet permit limits.

- Alternative T-6: UV Treatment System Only

This alternative would include only the installation of a new UV treatment system done as a stand-alone and independent project from any other lagoon treatment improvements. This alternative could be completed with or without other lagoon treatment upgrades.

Step 4: *Identify Potential Direct and Indirect Impacts Associated with Floodplain Development.*

The project in town and the lagoon site south of town are both located in the floodplain but will have minimal impacts on the floodplain. This is because the replacement of wastewater lines will be completed within the same footprint as the previous ones and any disturbance of the area will be restored to its original condition as much as possible. The design will also minimize ground disturbance. Although the area has experienced some flooding in the past, it has never reached the proposed elevation.

The Town of Saco is a member of the National Flood Insurance Program and structures located in the flood zone must comply with the local flood ordinance. HUD requires projects located in the floodplain to maintain flood insurance for the life of the property. The project location is in the 100-year floodplain so this requirement does apply.

The Town of Saco is responsible for the maintenance and operation of the levee system that surrounds and protects the Town. The Saco Levee system has protected the town from major floods over the years. Some of the long-standing Town residents do report that some historical major flooding events have risen to within just inches of the top of the existing levee that surrounds the Town.

The existing lagoon treatment system is located within the flood plain and outside of the existing levee system. Any new major lagoon improvements will likely include excavation and embankments of the existing berms. Major upgrades, if completed, would include designing the new berm elevations to ensure the top of the berms will be above that of the floodplain water surface levels yet to be verified by regional flood plain mapping.

The Town is located in a relatively low-lying area. The Town reports drainage issues and ponding during times of rapid snow melt or intense rainstorms. When the area is completely flooded and saturated, the groundwater and surface water intrusion will also make its way into the sewer and cause major I&I intrusion into the collection system, lift station and treatment lagoons. Improvements to the collection system will serve to reduce the I&I into the collection system and downstream treatment lagoons.

In addition to concerns for life and property, the town considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources.

The construction will have minimal effects on water resources by replacing the wastewater lines and disallowing impervious surfaces around the floodplain.

Societal resources were also considered during the design process.

Step 5: *Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore and preserve the values of the floodplain.*

The proposed action is inside the 100-year floodplain. The proposed action minimized potential adverse impacts to lives, property and natural values within the floodplain in the following ways:

- (a) Preserving Lives: Homes are located adjacent to the project location. The project will preserve life by providing residents with a properly functioning wastewater system. It will eliminate any backflow and/or I&I issues, improving overall quality of life.
- (b) Preserving Property: The project location will be restored to the original land features, thus preserving the properties effected by the installation of new sewer lines.
- (c) Preserving Natural Values and Minimizing Impacts: The chosen site design reduced floodplain impacts and prevented new construction from occurring in the floodplain.

Step 6: *Reevaluate the Alternatives.*

Collection System

No Action Alternative

No action may be considered an alternative in order to save immediate cost. This alternative is not viable considering the extensive problem of the collection system with damaged, sagging, cracking piping, and resulting significant I&I intrusion. Longterm O&M costs will increase if the condition of the collection system is left unaddressed.

Alt. C-1: Phase 1 Collection System Improvements

This alternative includes initial/partial open cut replacement of the existing clay piping and manholes to fix the sagging, cracked and deteriorating collection system. Phasing of collection system improvements allows the Town to maximize available funding to develop a more affordable project, and limit rate impacts to users. The Phase I collection system improvements are being funded with ARPA grant funding. The Phase 1 project is anticipated to be designed in 2022 and constructed in 2023. This project scope includes the replacement of up to 1,000 feet of pipe and manholes within Town as identified on the project phasing plan. This is considered a high priority project as determined by a condition assessment and input from the Town. Phase 2 collection system improvements include the replacement and installation of up to 1,300 feet of pipe manholes from the lift station, the highway and railroad crossing to the alley between Vagg Street and US 2, and installation of new sewer main in the alley from 1st Street to Nelson Street This phase also includes the abandonment of the existing pipe located within the edge of Highway 2 (Taylor Street) and moving this collection pipe segment to the alley north of US 2. This phase includes the trenchless (bore and jack) replacement of collection pipe extending under US 2 and the BNSF Railroad.

Phase 3 collection system improvements includes additional replacement of collection system upgrades. Due to the size of the project, the Phase 3 project may be further split into sub-phases to make the projects more affordable for the Town by taking advantage of available grants offered each grant cycle. The project includes the replacement of pipe and manholes south of the railroad track, as well as segments along Mill Street, the alleys between Blue Street and Stevens Street, 1st Street to 3rd Avenue, and the alley between 1st and 2nd Streets as indicated on the phasing map.

Phase 4 collection system improvements includes the replacement of all the remainder of collection pipe in the Town.

Design Criteria

The new collection system improvements would be designed in accordance with Circular DEQ-2, Chapter 30 – Design of Sewers. Open cut sewer installations would correct deficiencies including cracked pipe, offset joints, and sags. All new collection piping would be a minimum of 8-inches in size and would drastically improve system hydraulics with new water-tight PVC piping.

Map

Figure 5-1 shows the conceptual layout of the phased collection system improvements. Lesser pipe is replaced in the Phase 1 and 2 projects than indicated in Phase 3, as Phase 1 and Phase 2 project would be constructed in conjunction with upgrades to the lift station and lagoons, respectively. The map also shows phase 4 improvements.

Environmental Impacts

Although portions of the Town may be disturbed by open trench digging, virtually all areas will be within existing rights-of-way and easements that have been previously disturbed by development and previous utility installations. There will be no changes in land use after the completion of the project. Some air quality problems with dust may arise during the construction. However, it would be temporary, and the contract documents would require that the Contractor provide dust control. Similarly, there will be some temporary increases to noise during construction.

Some inconveniences to traffic will also result from the open cut construction work. This will only be temporary, and the contractor will be required to provide traffic control plans and periodic project updates on the work progress.

The project may encounter petroleum contaminated soils for areas of known DEQ LUST sites. The construction contract documents will identify these locations and list provisions in the specification that outline the steps required should these soils be encountered.

The contract documents shall also require that Best Management Practices (BMPs) be employed before, during, and after construction until all areas of disturbance have been fully reclaimed and/or re-vegetated.

For the reasons stated above, environmental impacts are considered minimal and no permanent, negative environmental impacts are anticipated.

Land Requirements

The proposed collection system improvements will not require the acquisition of land as the new pipelines will be placed within the existing utility corridor locations and rights-of-way.

Potential Construction Problems

Given the high groundwater levels within the work area, construction trench dewatering is anticipated. The contractor will need to deal with groundwater discharges and will also be required to obtain a temporary discharge permit. These tasks will result in slower production, higher trench safety risks, and higher project costs.

A geotechnical assessment including bore holes, and a geotechnical engineering report will be prepared to support the planning and construction phase of the project highway and railroad crossings.

Sustainability Considerations

The continued use of the existing clay sewer collection mains and corroding manholes has been a significant problem for the Town. Given the age and poor condition of these facilities, it is likely that maintenance costs would continue to increase without replacement. Replacing the collection mains with new PVC pipe and new concrete manholes will provide a more reliable and sustainable utility and will likely offer the beneficial impact of reducing maintenance costs.

Water and Energy Efficiency

This collection system alternative would not require any additional electrical demands to the wastewater system. Reducing I&I flows would reduce energy consumption at the lift station due to reduced pumping.

Green Infrastructure

Stormwater management during the project would include temporary erosion and sediment control measures. This would include the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment from construction activities. As a condition of the contract documents, the contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

Table 5-1 shows the preliminary capital cost estimate of the Phase I Collection System Improvements. Since the Phase 1 project is being funded by ARPA, the cost estimates assume an 8% annual inflation factor to 2023. Inflation is based on the most recent engineering new record (ENR) index average for construction.

The proposed collection system improvements may serve to slightly reduce O&M costs due to the use of new PVC mains and precast concrete manholes. Therefore, the O&M cost tables for increased O&M, are not provided and these costs are assumed to be included within the Town's current O&M budget.

Table 5-1 - Opinion of Probable Cost, C-1 Phase 1 Collection Improvements

Opinion of Probable Cost					
C-1: Phase 1 Collection Improvements					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	3	EA	\$ 7,000.00	\$ 21,000
3	8" PVC Sewer	860	LF	\$ 100.00	\$ 86,000
4	Connect to Existing Sewer	2	EA	\$ 2,500.00	\$ 5,000
5	Type A Surface Restoration	300	SY	\$ 60.00	\$ 18,000
6	Type B Surface Restoration	900	SY	\$ 20.00	\$ 18,000
Direct Construction Subtotal					\$ 168,000
	Mobilization			10%	\$ 17,000
	Traffic Control			1%	\$ 2,000
Construction Subtotal					\$ 187,000
	2023 Construction Cost ²			8.0%	\$ 202,000
	Contingency			20%	\$ 40,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 40,000
	RPR				\$ 20,000
	Professional Services (Grant Admin)				\$ 20,000
	Legal & Administrative				\$ 10,000
TOTAL					\$ 332,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2023 using an 8% inflation rate.

Alt. C-2: Phase 2 Collection System Improvements

This alternative includes partial open cut replacement of the existing clay piping and manholes to fix the sagging, cracked and deteriorating system.

Phase 2 collection system improvements include costs for the replacement and installation of up to 1,300 feet of pipe manholes from the lift station, the highway and railroad crossing to the alley between Vagg Street and US 2, and installation of new sewer main in the alley from 1st Street to Nelson Street. This phase also includes the abandonment of the pipe along Highway 2 (Taylor Street) and movement of this segment north to the alley. Only two services are located along this section due to the park site. These will be redirected to the alley with the proposed project. This phase includes the bore and jack replacement of collection pipe running under US 2 and the BNSF Railroad.

Design Criteria

The new collection system improvements would be designed in accordance with Circular DEQ-2, Chapter 30 – Design of Sewers. Open cut sewer installations would correct deficiencies including cracked pipe, offset joints, and sags. All new collection piping would be a minimum of 8-inches in size and would drastically improve system hydraulics with new PVC piping.

Map

Figure 5-2 shows the conceptual layout of the phased collection system improvements.

Environmental Impacts

Although portions of the Community may be disturbed by open trench digging, virtually all areas will be within existing rights-of-way and easements which have been previously disturbed by development and previous utility installation. There will be no changes in land use after completion of the project.

Some air quality problems with dust may arise during the construction; however, it would be temporary, and the contract documents would require that the Contractor provide dust control. Similarly, there will be some temporary increases to noise during construction. Some inconveniences to traffic will also result from the open cut construction work. This will only be temporary, and the contractor will be required to provide traffic control plans and weekly updates on the work progress.

The project may encounter petroleum contaminated soils for areas of known DEQ LUST sites. The construction contract documents will identify these locations and list provisions in the specification that outline the steps required should these soils be encountered.

The contract documents shall also require that Best Management Practices (BMPs) be employed before, during, and after construction until all areas of disturbance have been fully reclaimed and/or re-vegetated.

For the reasons stated above, environmental impacts are considered minimal and no permanent, negative environmental impacts are anticipated.

Land Requirements

The proposed collection system improvements will not require land acquisition as the new pipelines will be placed within the existing utility corridor locations and rights-of-way.

Potential Construction Problems

It is anticipated that the US 2 and BNSF Railroad crossing will need to be performed using trenchless technology using boring and jacking methods. Though this type of work is not uncommon, these installation techniques are more costly than conventional open cut installation. Careful quality control of the lines and

grades will be needed to verify the final installation of the sewer main is at the required slope under the highway and railroad.

Given the high groundwater levels within the work area, construction trench dewatering is anticipated. This will result in slower production, higher trench safety risks, and higher project costs.

A geotechnical assessment will include bore holes and a geotechnical engineering report will be prepared to support the planning and construction phase of the project highway crossing.

Sustainability Considerations

The continued use of the existing clay sewer collection mains and corroding manholes has been a significant problem for the Town. Given the age and poor condition of these facilities, it is likely that maintenance costs would continue to increase without replacement. Replacing the collection mains with new PVC pipe and new concrete manholes will provide a more reliable and sustainable utility and may have the beneficial impact of reducing maintenance costs.

Water and Energy Efficiency

This collection system alternative would not require any additional electrical demands to the wastewater system. Reducing I&I flows would reduce energy consumption at the lift station due to reduced pumping.

Green Infrastructure

Stormwater management during the project would include temporary erosion and sediment control measures. This would include the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

Table 5-2 shows the capital cost estimate for Phase 2 Collection System Improvements. Phase 2 costs assume an 8% annual inflation factor for construction in 2024. No O&M cost increases are assumed and assumed to be included within the Town's current O&M budget. Table 5-1 from the PER update shows the updated costs for the preferred alternative.

W:\S\Hillman\Projects\11-1222-Saco\Call 2021-2024\T03 - WW - E\10400 - 11-1222-2021-T03 - Schematic - 01.dwg

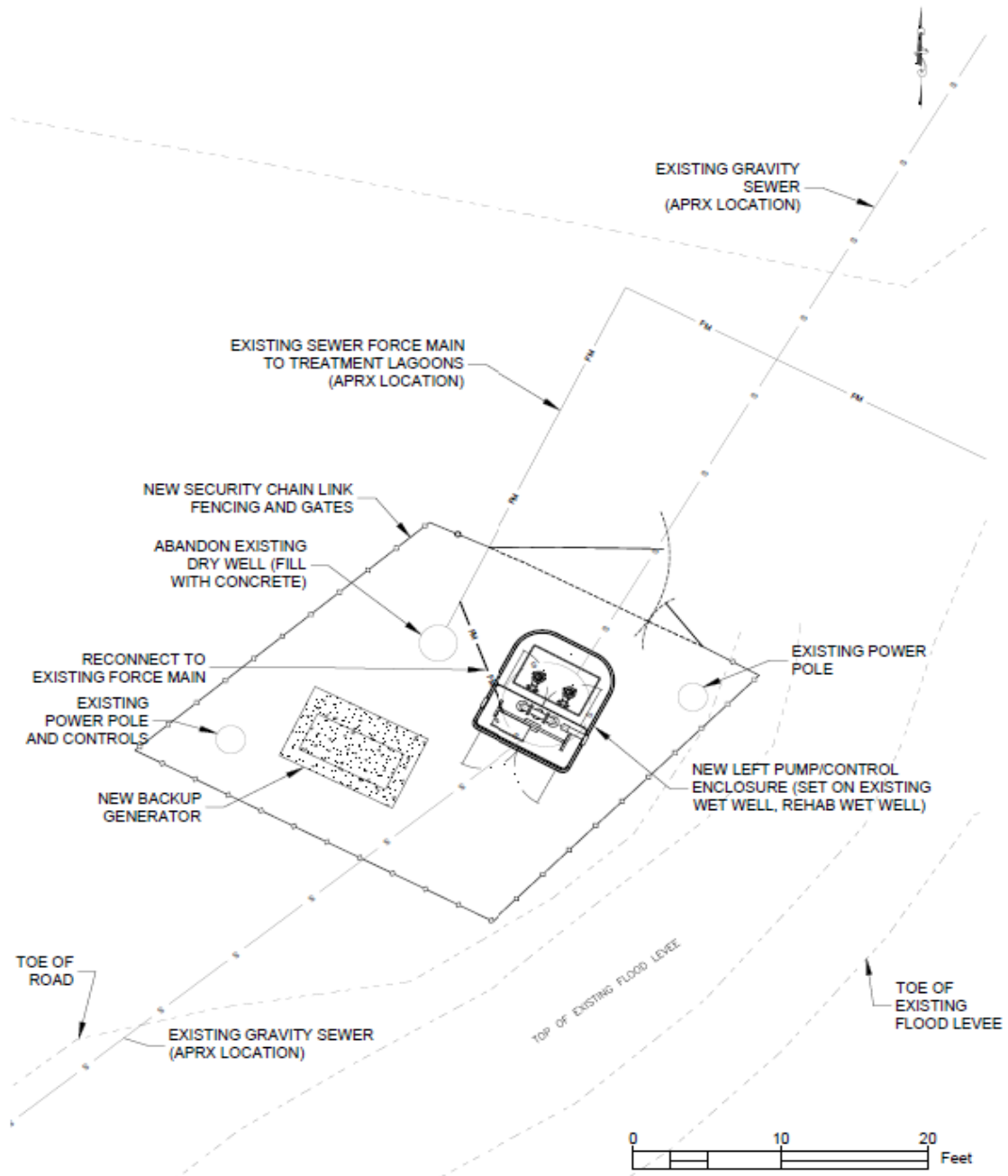


Figure 5-2
Saco Lift Station
Schematic Site Plan

Town of Saco, Montana
Wastewater PER



Table 5-2 - Opinion of Probable Cost, C-2 Phase 2 Collection Improvements

Opinion of Probable Cost					
C-2: Phase 2 Collection Improvements					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	4	EA	\$ 7,000.00	\$ 28,000
3	Restrained Joint Carrier Pipe (HWY and MDT)	270	LF	\$ 120.00	\$ 32,400
4	Steel Casing Pipe (HWY and MDT)	270	LF	\$ 900.00	\$ 243,000
5	8" PVC Sewer	1,050	LF	\$ 100.00	\$ 105,000
6	Reconnect Sewer Services	10	EA	\$ 1,000.00	\$ 10,000
7	Sewer Services	200	LF	\$ 60.00	\$ 12,000
8	Connect to Existing Sewer	4	EA	\$ 2,500.00	\$ 10,000
9	Type A Surface Restoration	50	SY	\$ 60.00	\$ 3,000
10	Type B Surface Restoration	1,200	SY	\$ 20.00	\$ 24,000
Direct Construction Subtotal					\$ 487,000
	Mobilization			10%	\$ 49,000
	Traffic Control			1%	\$ 5,000
Construction Subtotal					\$ 541,000
	2024 Construction Cost ²			8.0%	\$ 631,000
	Contingency			20%	\$ 126,000
	Permitting (Railroad & MDT)				\$ 20,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 110,000
	RPR				\$ 40,000
	Professional Services (Grant Admin)				\$ 35,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 982,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Table 5-1 - Phase 2 Updated Collection System Estimate

OPINION OF PROBABLE COST SACO WASTEWATER SYSTEM IMPROVEMENTS C-2: PHASE 2 COLLECTION IMPROVEMENTS					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	6	EA	\$ 7,000.00	\$ 42,000
3	Restrained Joint Carrier Pipe (HWY and MDT)	270	LF	\$ 150.00	\$ 40,500
4	Steel Casing Pipe (HWY and MDT)	270	LF	\$ 900.00	\$ 243,000
5	8" PVC Sewer	1,450	LF	\$ 100.00	\$ 145,000
6	Reconnect Sewer Services	20	EA	\$ 1,000.00	\$ 20,000
7	Sewer Services	300	LF	\$ 60.00	\$ 18,000
8	Connect to Existing Sewer	4	EA	\$ 2,500.00	\$ 10,000
9	Type A Surface Restoration	50	SY	\$ 60.00	\$ 3,000
10	Type B Surface Restoration	1,500	SY	\$ 20.00	\$ 30,000
11	Railroad Permit Coordination/Control	1	LS	\$ 15,000.00	\$ 15,000
Direct Construction Subtotal					\$ 587,000
	Mobilization			10%	\$ 59,000
	Traffic Control			1%	\$ 6,000
Construction Subtotal					\$ 652,000
	2025 Construction Cost ²			8.0%	\$ 760,000
	Contingency			20%	\$ 152,000
	Permitting (BNSF Permit)				\$ 15,000
	Permitting (MDT Permit)				\$ 10,000
	Permitting (USACE Levee Permit)				\$ 12,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 130,000
	RPR				\$ 65,000
	Professional Services (Grant Admin)				\$ 35,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 1,199,000

Alt. C-3: Phase 3 Collection System Improvements

Phase 3 collection system improvements include the final phase of collection system upgrades. The phase three project may be further split into sub-phases to make the projects more affordable for the Town and to reduce potential rate impacts by taking advantage of available grants offered each cycle. The scope of a future Phase 3 project and grant application can be evaluated in more detail following the completion of the Phase 2 Project. A PER Amendment may be required to accommodate a future grant application and account for new information and costs.

The Phase 3 project includes the replacement of pipe and manholes south of the railroad track, as well as segments along Mill Street, alleys between Blue Street and Stevens Street, 1st Street to 3rd Avenue, and an alley between 1st and 2nd Streets.

Design Criteria

The new collection system improvements would be designed in accordance with DEQ Circular-2, Chapter 30 – Design of Sewers. Open cut sewer installations would correct deficiencies including cracked pipe, offset joints, and sags. All new collection piping would be a minimum of 8-inches in size and would drastically improve system hydraulics with new PVC piping.

Map

Figure 5-1 shows the conceptual layout of the phased collection system improvements.

Environmental Impacts

Although portions of the Community may be disturbed by open trench digging, virtually all areas will be within existing rights-of-way and easements which have been previously disturbed by development and previous utility installation. There will be no changes in land use after completion of the project.

Some air quality problems with dust may arise during the construction; however, it would be temporary, and the contract documents would require that the Contractor provide dust control. Similarly, there will be some temporary increases to noise during construction. Some inconveniences to traffic will also result from the open cut construction work. This will only be temporary, and the contractor will be required to provide traffic control plans and weekly updates on the work progress.

The contract documents shall also require that Best Management Practices (BMPs) be employed before, during, and after construction until all areas of disturbance have been fully reclaimed and/or re-vegetated.

The project may encounter petroleum contaminated soils for areas of known DEQ LUST sites. The construction contract documents will identify these locations and list provisions in the specification that outline the steps required should these soils be encountered.

For the reasons stated above, environmental impacts are considered minimal and no permanent, negative environmental impacts are anticipated.

Land Requirements

The proposed collection system improvements will not require the acquisition of land as the new pipelines will be placed within the existing utility corridor locations and rights-of-way.

Potential Construction Problems

It is anticipated that work will be performed within the MDT right of way for MT 243 portion of the project so attention to traffic control will be required. Given the high groundwater levels within the work area, construction

trench dewatering is anticipated. This will result in slower production, higher trench safety risks, and higher project costs.

A geotechnical assessment will include bore holes and a geotechnical engineering report will inform the design and construction of the project.

Sustainability Considerations

The continued use of the existing clay sewer collection mains and corroding manholes has been a significant problem for the Town. Given the age and poor condition of these facilities, it is likely that maintenance costs would continue to increase without replacement. Replacing the collection mains with new PVC pipe and new concrete manholes will provide a more reliable and sustainable utility and may have the beneficial impact of reducing maintenance costs.

Water and Energy Efficiency

This collection system alternative would not require any additional electrical demands to the wastewater system. Reducing I&I flows would reduce energy consumption at the lift station due to reduced pumping.

Green Infrastructure

Stormwater management during the project would include temporary erosion and sediment control measures. This would include the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

Table 5-3 shows the capital cost estimate for Phase 3 Collection System Improvements. Phase 3 costs assume an 8% annual inflation factor for construction in 2026 to follow the Phase 2 project. As mentioned earlier, the Phase 3 project may be split into sub-phases to create a more affordable project and take advantage of available grant funding. It is evident that nearly all the existing clay collection system is in need of repair. Therefore, a cost estimate for a scaled-down Phase 3A and subsequent Phase 3B project option, is provided in Table 5-4 and 5-5, below. This option would replace about half of the identified pipe and manholes shown on the phasing plan and include the work within MT 243.

Since nearly all the clay collection system is in the similar condition as evidenced by video footage, a cost for a Phase 4 projects also added to complete the remainder of the collection system improvements. The Phase 4 cost estimate is shown on Table 5-3. No O&M cost increases are assumed and assumed to be included within the Town's current O&M budget.

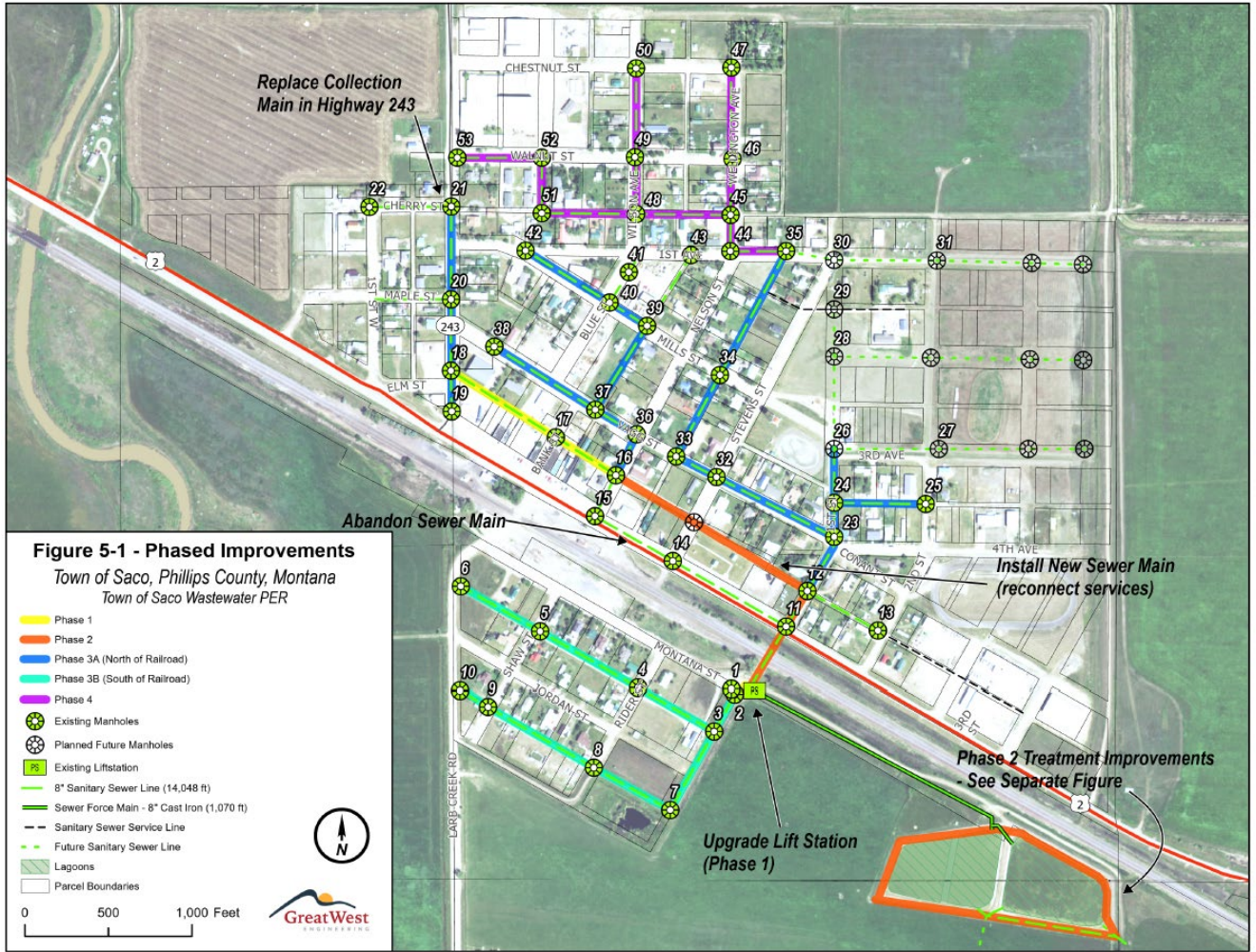


Table 5-3 - Opinion of Probable Cost, C-3 Phase 3 Collection Improvements

Opinion of Probable Cost					
C-3: Phase 3 Collection Improvements					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	26	EA	\$ 7,000.00	\$ 182,000
3	8" PVC Sewer	7,500	LF	\$ 100.00	\$ 750,000
4	Flowable fill within MDT R/W	600	CY	\$ 110.00	\$ 66,000
5	Reconnect Sewer Services	50	EA	\$ 1,000.00	\$ 50,000
6	Sewer Services	1,000	LF	\$ 60.00	\$ 60,000
7	Connect to Existing Sewer	4	EA	\$ 2,500.00	\$ 10,000
8	Type A Surface Restoration	770	SF	\$ 55.00	\$ 42,350
9	Type B Surface Restoration	7,200	SY	\$ 20.00	\$ 144,000
Direct Construction Subtotal					\$ 1,324,000
	Mobilization			10%	\$ 132,000
	Traffic Control			1%	\$ 13,000
Construction Subtotal					\$ 1,469,000
	2026 Construction Cost ²			8.0%	\$ 1,998,000
	Contingency			20%	\$ 400,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 355,000
	RPR				\$ 120,000
	MDT Permit				\$ 10,000
	Professional Services (Grant Admin)				\$ 50,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 2,953,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2026 using an 8% inflation rate.

Table 5-4 - Opinion of Probable Cost, C-3A Phase 3A Collection Improvements

Opinion of Probable Cost					
C-3A: Phase 3A Collection Improvements					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	18	EA	\$ 7,000.00	\$ 126,000
3	8" PVC Sewer	5,000	LF	\$ 100.00	\$ 500,000
4	Flowable fill within MDT R/W	600	CY	\$ 110.00	\$ 66,000
5	Reconnect Sewer Services	30	EA	\$ 1,000.00	\$ 30,000
6	Sewer Services	600	LF	\$ 60.00	\$ 36,000
7	Connect to Existing Sewer	4	EA	\$ 2,500.00	\$ 10,000
8	Type A Surface Restoration	1,000	SY	\$ 55.00	\$ 55,000
9	Type B Surface Restoration	5,500	SY	\$ 20.00	\$ 110,000
Direct Construction Subtotal					\$ 953,000
	Mobilization			10%	\$ 95,000
	Traffic Control			1%	\$ 10,000
Construction Subtotal					\$ 1,058,000
	2026 Construction Cost ²			8.0%	\$ 1,439,000
	Contingency			20%	\$ 288,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 259,000
	RPR				\$ 86,000
	MDT Permit				\$ 10,000
	Professional Services (Grant Admin)				\$ 35,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 2,137,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2026 using an 8% inflation rate.

Table 5-5 - Opinion of Probable Cost, C-3B Phase 3B Collection Improvements

Opinion of Probable Cost C-3B Phase 3B Collection Improvements					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Temporary Sewer Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
2	48" Sewer Manholes	8	EA	\$ 7,000.00	\$ 56,000
3	8" PVC Sewer	2,500	LF	\$ 100.00	\$ 250,000
4	Reconnect Sewer Services	15	EA	\$ 1,000.00	\$ 15,000
5	Sewer Services	300	LF	\$ 60.00	\$ 18,000
6	Connect to Existing Sewer	1	EA	\$ 2,500.00	\$ 2,500
7	Type B Surface Restoration	2,800	SY	\$ 20.00	\$ 56,000
Direct Construction Subtotal					\$ 418,000
	Mobilization			10%	\$ 42,000
	Traffic Control			1%	\$ 4,000
Construction Subtotal					\$ 464,000
	2026 Construction Cost ²			8.0%	\$ 631,000
	Contingency			20%	\$ 126,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 114,000
	RPR				\$ 38,000
	MDT Permit				\$ 10,000
	Professional Services (Grant Admin)				\$ 30,000
	Legal & Administrative				\$ 15,000
TOTAL					\$ 964,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2026 using an 8% inflation rate.

Treatment System

No Action Alternative

The No Action Alternative means no improvements would be made to the existing treatment system. This is an option to minimize capital costs. However, degradation of surface water resources will continue without improvements to the wastewater treatment facilities. The existing facility will also continue to require increasing

Alt. T-1: Reconstruct Lagoons with UV Treatment

This alternative would include removing accumulated sludge and fully reconstructing the existing lagoons to the latest design standards. This would require modifying the lagoon site to have 2 primary cells and a secondary cell within the same footprint to satisfy DEQ Circular-2 Section 93.36. New embankments would be constructed to provide the minimum required internal 3-feet of freeboard. A synthetic liner such as a HDPE would be installed in the reconstructed lagoons. HDPE as opposed to PVC can be exposed to sunlight without suffering degradation from the ultraviolet rays. The liner subgrade would be regraded and recompacted. Any unsuitable material would be removed and replaced with compatible suitable material. During and after the placement

process, quality control and quality assurance (QAQC) procedures by the liner installer would be observed by site inspector to ensure the liner is watertight. A hydraulic leak test would be completed for final acceptance prior to putting each lagoon into service.

This alternative would also include construction of a new building or large accessible vault along effluent piping to protect the UV disinfection equipment. Ultraviolet light is an effective method of disinfecting wastewater without adding pollutants to the waste stream. UV inactivates pathogens through absorption of UV energy/radiation that damages the cellular makeup of microorganisms in the effluent. Based on previous discussion (reference section 5.1), systems considered for Saco would include low pressure lamps.

Turbidity and sediment in the lagoons can inhibit the effectiveness of UV system treatment and limit the amount of inactivation necessary to meet discharge limits. As such, samples of effluent quality from the system should be periodically monitored to ensure transmittance values are consistent with design criteria.

UV disinfection systems for wastewater effluent come in a variety of configurations, including open-channel systems with vertical or horizontally oriented lamps and closed vessel systems. Closed vessel systems, though typically requiring a lower installation footprint, are not typically used for systems with higher effluent solids concentration. Sediment can accumulate in UV chambers restricting flow and preventing uniform distribution of flow through the system necessary for disinfection. An open channel system is recommended for this type of system.

A UV supplier was contacted to obtain preliminary design and budgetary quotes and cut sheets of disinfection equipment for the facility (see Appendix T). The UV system would be installed with two disinfection modules for in-series, full-redundancy lamps due to the periodic TSS spikes due to turn-over or algae periods, typically observed within existing lagoon effluent.

In addition to fully upgrading the lagoon berms and provide sufficient freeboard, this option also includes the replacement of all lagoon operational control valves and lagoon piping.

Design Criteria

To meet the E. coli limits, this alternative would include UV disinfection. Disinfection equipment design criteria is included in Circular DEQ-2, Section 104. Lagoon upgrades will be completed in conformance to Circular DEQ-2 Chapter 90 Biological Treatment Section 93 – Wastewater Treatment Ponds, where applicable to the proposed scope of work.

Map

See Figure 5-3 Reconstruct Lagoons with UV Treatment. A new UV system would be placed near the discharging outlet of the secondary cell and along the effluent piping alignment.

Environmental impacts

The anticipated environmental impacts will be insignificant with the work taking place in the existing footprint of the lagoons. Construction disturbances include temporary dust and noise from heavy construction equipment.

The effluent quality would be improved as required to meet effluent limits set by the permit and would lead to the long-term benefit of discharging a higher quality treated wastewater effluent.

Land Requirements

The new UV treatment building would be installed within the existing Town-owned lagoon site. No additional land would be needed for this installation.

Potential Construction Problems

Depending on the time of year and if it is a wet year, the groundwater levels can be high. However the lagoon floor level would be designed to match the existing elevation. Dewatering could be required to prevent a saturated environment. No specific construction problems are anticipated with the construction of a new UV treatment building.

Sustainability Considerations

By the installation of a disinfection treatment system, the Town would have a reliable means to operate the treatment facility without exceeding permit limits. New lagoon piping and structures would be easier to operate and would aid in maintenance activities.

Water and Energy Efficiency

To meet the disinfection requirements of the discharge permit, this alternative would require a new UV treatment building at the lagoon effluent pipe. The preliminary system equipment design, which varies per manufacturer, would include a demand of about 4.2 kW. The estimated annual power consumption, when the system is batch discharging, at up to 2 months per year, and is estimated to be approximately 6,800 kwh for an estimated cost of \$1,100 per year.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

The estimated cost for this alternative is summarized below in Table 5-8, below. Table 5-9 shows the estimated O&M increase for this alternative.

Table 5-8 - Reconstruct Lagoons with UV System Cost Estimate

Opinion of Probable Cost					
T-1: Treatment System Improvements - Reconstructed Lagoons With UV System					
#	Bid Item	Qty	Units	Unit Price ¹	Total
1	Exploratory Excavation	20	HR	\$ 250.00	\$ 5,000
2	Dewatering	1	LS	\$ 25,000.00	\$ 25,000
3	Sludge Removal and Disposal	1	LS	\$ 250,000.00	\$ 250,000
4	Topsoil Removal and Stockpile	2,000	CY	\$ 5.00	\$ 10,000
5	Remove and Dispose of Abandon Existing Lagoon Piping and Structures	1	LS	\$ 15,000.00	\$ 15,000
6	Lagoon Excavation & Embankment	6,500	CY	\$ 15.00	\$ 97,500
7	Lagoon Liner Subgrade	4,000	CY	\$ 7.00	\$ 28,000
8	60 Mil HDPE Liner	220,000	SF	\$ 0.75	\$ 165,000
9	Lagoon Vent System	4,000	LF	\$ 1.50	\$ 6,000
10	Liner Protective Soil Cover (Embankments Only)	2,000	CY	\$ 10.00	\$ 20,000
11	Connect to Existing Influent Sewer	1	EA	\$ 3,000.00	\$ 3,000
12	Splitter Structure	1	EA	\$ 15,000.00	\$ 15,000
13	Lagoon Piping	850	LF	\$ 75.00	\$ 63,750
14	Level Control Structure (With Telescoping Valve)	1	EA	\$ 15,000.00	\$ 15,000
15	Treatment Lagoon Inlet - Pipe Support/Splash Pad	1	EA	\$ 5,000.00	\$ 5,000
16	Concrete Splash Pad	1	EA	\$ 2,000.00	\$ 2,000
17	Interior/Exterior Lagoon Emergency Overflow 10" DIP Piping	30	LF	\$ 85.00	\$ 2,550
18	Exterior Lagoon Emergency Overflow Rip Rap	1	LS	\$ 2,000.00	\$ 2,000
19	Lagoon Rip Rap and Fabric	1,750	CY	\$ 50.00	\$ 87,500
20	Remove and Dispose of Existing Fence	2,500	LF	\$ 0.50	\$ 1,250
21	Wildlife Fencing & Gates	2,500	LF	\$ 15.00	\$ 37,500
22	Lagoon Signs	1	LS	\$ 2,500.00	\$ 2,500
23	Lagoons Stage Gauge (3' Width)	2	EA	\$ 5,000.00	\$ 10,000
24	Seed and Fertilizer	2	AC	\$ 700.00	\$ 1,050
25	Temporary Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
26	UV Treatment Building & Sitework	1	LS	\$ 280,000.00	\$ 280,000
27	Furnish & Install UV Disinfection System & Piping	1	LS	\$ 150,000.00	\$ 150,000
28	UV Building Electrical	1	LS	\$ 50,000.00	\$ 50,000
	Direct Construction Subtotal				\$ 1,370,000
	Mobilization		10%		\$ 137,000
	Construction Subtotal				\$ 1,507,000
	2024 Construction Cost ²		8.0%		\$ 1,758,000
	Contingency		20%		\$ 352,000
	Extend 3-Phase Power to UV Site				\$ 60,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction		15%		\$ 263,700
	RPR		5%		\$ 87,900
	Professional Services (Grant Admin)				\$ 53,000
	Legal & Administrative				\$ 30,000
	TOTAL				\$ 2,604,600

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Table 5-9 - Reconstruct Lagoons with UV System O&M Cost Estimate

Opinion of Probable Annual Operation & Maintenance Costs					
T-1: Treatment System Improvements - Reconstructed Lagoons With UV System					
#	Item	Qty	Units	Unit Price	Total
1	Operator	60	HR	\$ 20.00	\$ 1,200.00
2	UV Power	6,800	KWH	\$ 0.15	\$ 1,020.00
3	Monitoring & Testing	1	LS	\$ 700.00	\$ 700.00
4	Spare Parts/Repair Maintenance	1	LS	\$ 500.00	\$ 500.00
5	Reserve	1	LS	\$ 500.00	\$ 500.00
TOTAL					\$ 3,900.00

Alt. T-2: Total Retention (without UV Treatment)

This alternative would include reconstructing the existing lagoons, similar to the alternative described above, with the installation of an additional total retention lagoon. The total retention systems consist of large shallow ponds (4-6 feet deep) that rely on evaporation to eliminate the wastewater effluent. Solids are periodically removed from the ponds and properly disposed of via land farming or licensed solid waste facilities. These systems require considerably more land area than nonaerated discharging facultative or aerated lagoon systems due to their reliance on evaporation for effluent disposal.

The ponds must be lined to prevent wastewater seepage into the groundwater. The ponds would provide sufficient control structures and piping to allow some redirection of flows to prevent odors. Treated effluent is disposed of by evaporation, so no discharge permit is required. The ponds are extremely simple to operate and maintain, reliable, and not heavily regulated because they do not require a discharge permit.

The Town would maintain its permit for emergency discharge purposes. The size of an additional new evaporation cell would be about 7 to 8 acres using the Circular DEQ-2 design criteria and local precipitation and evaporation data. (See Appendix R for preliminary total retention sizing)

Design Criteria

Project components include the expansion, lining, and re-shaping of the existing facultative lagoons and constructing a new total retention lagoon cell. Lagoon upgrades will be completed in conformance to Circular DEQ-2 Chapter 90 Biological Treatment Section 93 – Wastewater Treatment Ponds, where applicable to the proposed scope of work.

A discharge permit is not required with total retention ponds. When compared to other alternatives, this alternative would allow the Town to address both existing and future regulatory problems by eliminating the discharge and removing the need for a discharge permit.

Map

A schematic map showing Total Retention alternative is found in Figure 5-4.

Environmental impacts

The environmental impacts of this alternative would be very positive. By upgrading and lining the lagoons, potential leakage would be curtailed, thus significantly improving the groundwater quality. Furthermore, surface water resources would be preserved by preventing surface water quality degradation since a surface water discharge would not be used.

It is possible that wetlands, exist in and around the lagoons. A wetland delineation would be completed to determine the existence of an area of potential impacts. A wetland permit would be sought from the Army Corps of Engineers, if necessary. The nearest wells within 1,000 feet of the potential new cells are stock and oil wells.

During construction, a stormwater runoff permit will be sought. Also, some temporary dust and noise problems may arise. See Chapter 2.0 for a comprehensive evaluation of environmental resources within the project area.

Land Requirements

As shown in the preliminary conceptual pond sizing calculations in Appendix R, the total water surface area requirement is 12 to 13 acres for all existing plus new cells, and the new water area required is about 7 to 8 acres. The Town-owned property is limited to the existing lagoon footprint so acquisition would be necessary under this proposed alternative.

Potential Construction Problems

A stormwater pollution prevention plan (SWPPP) permit will be necessary because the level of ground disturbance would exceed 1-acre.

The average depth of the static water level in the area is about 16-feet below ground surface, so groundwater removal during construction would not be expected during typical dry years. Depending on the time of year and if it is a wet year, the groundwater levels could be high. However, the lagoon floor elevation would be designed to limit excavation depths. Dewatering could be required to prevent a saturated environment.

Construction methods may vary. However, it is anticipated that the new retention basin would be built first and wastewater would be pumped into the treatment lagoon. This would allow drying and removal work form each cell. Once sludge is dried, it will be removed and properly disposed.

Sustainability Considerations

Of all the treatment alternatives considered, total retention is probably the most sustainable and require the least amount of O&M. There are no additional energy requirements with this alternative. Gravity flow will still be used to deliver raw sewage to the treatment cell and the subsequent storage cell.

Water and Energy Efficiency

This treatment system alternative would not require any additional electrical demands to the wastewater system.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

As shown in Table 5-10 shows the estimated capital for the total retention alternative. No O&M cost increases are assumed and are included within the Town's current O&M budget.



Table 5-10 - Opinion of Probable Cost, Total Retention System

Opinion of Probable Cost					
T-2: Treatment System Improvements - Total Retention System					
#	Bid Item	Qty	Units	Unit Price ¹	Total
1	Exploratory Excavation	20	HR	\$ 250.00	\$ 5,000
2	Dewatering	1	LS	\$ 25,000.00	\$ 25,000
3	Sludge Removal and Disposal	1	LS	\$ 250,000.00	\$ 250,000
4	Topsoil Removal and Stockpile	13,000	CY	\$ 5.00	\$ 65,000
5	Remove and Dispose of Abandon Existing Lagoon Piping and Structures	1	LS	\$ 15,000.00	\$ 15,000
6	Lagoon Excavation & Embankment	20,000	CY	\$ 15.00	\$ 300,000
7	Lagoon Liner Subgrade	10,000	CY	\$ 7.00	\$ 70,000
8	60 Mil HDPE Liner	540,000	SF	\$ 0.75	\$ 405,000
9	Lagoon Vent System	20,000	LF	\$ 1.50	\$ 30,000
10	Liner Protective Soil Cover (Embankments Only)	2,700	CY	\$ 10.00	\$ 27,000
11	Connect to Existing Influent Sewer	1	EA	\$ 3,000.00	\$ 3,000
12	Splitter Structure	1	EA	\$ 15,000.00	\$ 15,000
13	Lagoon Piping	900	LF	\$ 75.00	\$ 67,500
14	Level Control Structure (With Telescoping Valve)	1	EA	\$ 15,000.00	\$ 15,000
15	Treatment Lagoon Inlet - Pipe Support/Splash Pad	1	EA	\$ 5,000.00	\$ 5,000
16	Concrete Splash Pad	2	EA	\$ 2,000.00	\$ 4,000
17	Interior/Exterior Lagoon Emergency Overflow 10" DIP Piping	60	LF	\$ 85.00	\$ 5,100
18	Exterior Lagoon Emergency Overflow Rip Rap	2	LS	\$ 2,000.00	\$ 4,000
19	Lagoon Rip Rap and Fabric	3,400	CY	\$ 50.00	\$ 170,000
20	Remove and Dispose of Existing Fence	2,500	LF	\$ 0.50	\$ 1,250
21	Wildlife Fencing & Gates	3,500	LF	\$ 15.00	\$ 52,500
22	Lagoon Signs	1	LS	\$ 2,500.00	\$ 2,500
23	Lagoons Stage Gauge (3' Width)	3	EA	\$ 5,000.00	\$ 15,000
24	Seed and Fertilizer	4	AC	\$ 700.00	\$ 2,800
25	Temporary Bypass Pumping	1	LS	\$ 20,000.00	\$ 20,000
	Direct Construction Subtotal				\$ 1,575,000
	Mobilization		10%		\$ 158,000
	Construction Subtotal				\$ 1,733,000
	2024 Construction Cost ²		8.0%		\$ 2,021,000
	Contingency		20%		\$ 404,000
	Land Acquisition (±10 acres)				\$ 50,000
	Floodplain and Wetland Permitting				\$ 10,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 303,000
	RPR				\$ 101,000
	Professional Services (Grant Admin)				\$ 60,000
	Legal & Administrative				\$ 30,000
	TOTAL				\$ 2,979,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Alt. T-3: Minor Lagoon Upgrades with Irrigation

This alternative would include sludge removal and completing minor upgrades and repairs to the lagoon structures and piping. This alternative is in consideration that the minor upgrades may be sufficient to meet the treatment objectives. Minor lagoon upgrades are an attractive option to deal with the most pressing critical deficiencies and improve water quality without creating significant project costs for the community.

For these improvements, the influent splitter and valve structure would be replaced to allow for the proper series operation of the lagoon for optimal treatment and detention time. This alternative would also include minor earthwork operations to build up the existing eroded internal lagoon slopes. Rip rap protection, where missing, would be completed to prevent further degradation of the internal slopes.

This alternative also includes the use of an irrigation disposal system provide beneficial reuse of treated effluent and allow the Town to avoid discharging and be subject to E. coli violations. The irrigation site could be placed south of the existing lagoon site, which already supports an irrigated hay crop and is over 700 feet from existing residential areas. This provides more than the 200- foot minimum buffer setback required so the Town could treat to Circular DEQ-2 Class D reclaimed water treatment standards.

The irrigation system would offer a supplemental effluent disposal method for summer use. Given that the Town only needs to discharge 1 to 2 times per year, the Town could have the option to discharge Beaver Creek and/or irrigate on crop lands. With ample storage capacity in the existing lagoons, the Town would have the benefit of storing and irrigating in the mid to late summer months; a time when the Town is not allowed to discharge under the General Permit as a batch discharger.

Lease and maintenance agreements would be required to be executed with the landowner to maintain the hay crop for uptake of nitrogen when irrigation takes place. The required irrigation site area is estimated to be in the range of 6 to 10 acres based on preliminary calculations that factor in assumed crop type, irrigation volume applied, climate information, water balance, and nitrogen effluent and uptake parameters. Domestic wastewater generally dilute, and the effluent from the facilities that store for extended periods could see nitrogen effluent in the range of 10 to 30 milligrams per liter.

More detailed irrigation calculations in coordination with an agronomist and field testing would need to be completed during the design phase. The preliminary site assessment work tasks would determine if and what potential soils amendments might be required.

Groundwater monitoring wells may be required to assure that irrigation is not occurring in areas where the groundwater is less than 4-feet from the surface.

The completion of a detailed nutrient management and irrigation plan would be required for compliance to DEQ standards. The general equipment needed for an irrigation system would include an irrigation pump with a screen, flow meter, irrigation piping and irrigation spraying system such as an irrigation wheel or more manual water reel system.

Design Criteria

Lagoon upgrades will be completed in conformance to Circular DEQ-2 Chapter 90 Biological Treatment Section 93 – Wastewater Treatment Ponds, where applicable to the proposed scope of work. The lagoon upgrades and effluent irrigation system will be required to comply with Circular DEQ-2 Chapter 120 – Irrigation and Rapid Infiltration Systems.

Sludge removal and disposal would need to be completed in accordance with EPA 503 requirements.

For an irrigation system, the completion of nutrient management and irrigation plan (NMIP) would be required for approval and for long-term operations planning. The plan is used to track the irrigated areas, volumes, nitrogen, and other logged data to assure nitrogen uptake is achieved.

Map

A schematic map of minor upgrades with irrigation system is found on Figure 5-5.

Environmental Impacts

Impacts to the area would not be negative as lagoon improvements to the lagoon site would be at the existing lagoon footprint. Construction disturbances include temporary dust and noise from heavy construction equipment. Surface water resources would be preserved by preventing surface water quality degradation since effluent would be discharged primarily by irrigation and nitrogen taken up by the crops. The removal of accumulated sludge will greatly improve the treatment capacity of the system and water quality of the effluent. The sludge biosolids will provide beneficial reuse on existing crop lands if land application methods are used for disposal. Overall environmental impacts will be improved by the project.

Land Requirements

No additional land is required for the treatment lagoons site with all work taking place within the existing footprints. However, potentially up to 10 acres for an irrigation area would be needed for the system. The land can either be purchased from the landowner or a long-term lease agreement could along with an operations plan agreement would be required. DEQ typically requires a 20- year lease with a private landowner that allows the Town authority to control how the effluent is applied, volume, how applied, etc. (Circular DEQ-2, Section 121.19).

Potential Construction Problems

A stormwater pollution prevention plan (SWPPP) permit may be necessary because the level of ground disturbance could exceed 1-acre.

Careful planning of influent flows and transferring of standing water will be required to complete the work in the exiting treatment site. The influent sewer and standing water in each lagoon cell will need to be transferred a few times. The influent splitter control valve would need to be completed first and all flows diverted to either cell 1 or cell 2, then the standing the standing can be decanted, while the cell not receiving influent can be “de-sludged”. Earthwork to repair the berms and place new rip rap rock can completed while each cell is lowered. The Contractor will ultimately determine the construction method for sludge removal and disposal with guidance from the engineer.

Sustainability Considerations

Minor lagoon upgrades are an attractive option to deal with the most pressing critical lagoon structural deficiencies, and to improve water quality without creating significant project costs and increased loan debt to the community. Advantages of the irrigation concept are the simplicity of the operation requirements (no complex treatment process to understand), and the system does would require adhering to a MPDES discharge permit. The Town could still retain the discharge permit for emergency or for flexibility of discharging during non-irrigating months.

A summary of sustainability benefits of implementing irrigation include:

- Wastewater effluent has a naturally high nutrient content which reduces or even eliminates the need for expensive chemical fertilizers.
- Environmentally friendly – Using wastewater to irrigate crops and farmland is a sustainable practice that helps to reduce water wastage and conserve water supply.
- Higher production of crops – Supplemental irrigation allows farmers to grow more pastures and crops by providing access to water. Having access to water throughout the year also lengthens the growing season. In addition, irrigation allows farmers to grow crops in areas that would otherwise be considered too dry. It provides ‘insurance’ against seasonal variability and drought and provide fertilizer for crops.

- Better quality crops – Irrigation allows farmers to produce higher quality crops and pastures as water stress can dramatically impact on the quality of farm produce.
- Increase the value of the property – Irrigated land has the potential to support higher crops and animal production. It is therefore more valuable. This means that having an irrigation system in place often improves the value of the property.

Water and Energy Efficiency

This treatment system alternative would require additional electrical demands to the wastewater system to operate an effluent irrigation pump system. This pump would likely be a smaller horsepower (hp) pump in estimated the range of 5-10 hp.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution.

Effluent irrigation is considered “green” and would reduce or even eliminate the need for expensive chemical fertilizers.

Cost Estimates

The estimated capital cost is shown on Tables 5-11 and the estimated increase in O&M costs are summarized in Table 5-12.



Table 5-11 - Opinion of Probable Cost, Minor Lagoon Upgrades with Effluent Irrigation

Opinion of Probable Cost					
T-3: Minor Lagoon Upgrades - With Effluent Irrigation System					
#	Bid Item	Qty	Units	Unit Price ¹	Total
1	Exploratory Excavation	20	HR	\$ 250.00	\$ 5,000
2	Transfer Pumping	1	LS	\$ 10,000.00	\$ 10,000
3	Sludge Removal and Disposal	1	LS	\$ 250,000.00	\$ 250,000
4	Berm Embankments Earthwork	800	CY	\$ 20.00	\$ 16,000
5	Connect to Existing Influent Sewer	1	EA	\$ 5,000.00	\$ 5,000
6	Replace Influent Splitter Structure and Piping	1	EA	\$ 15,000.00	\$ 15,000
7	Rip Rap Slope Protection	500	CY	\$ 55.00	\$ 27,500
8	Livestock Fencing around irrigation site	2,000	LF	\$ 10.00	\$ 20,000
9	Irrigation System Pump System	1	LS	\$ 15,000.00	\$ 15,000
10	Irrigation Floating Intake	1	LS	\$ 15,000.00	\$ 15,000
11	Irrigation Piping	600	LF	\$ 20.00	\$ 12,000
12	Furnish/Install Irrigation Spray System	1	LS	\$ 30,000.00	\$ 30,000
13	Irrigation System Electrical	1	LS	\$ 25,000.00	\$ 25,000
Direct Construction Subtotal					\$ 446,000
	Mobilization	10%			\$ 45,000
Construction Subtotal					\$ 491,000
	2024 Construction Cost ²	8.0%			\$ 573,000
	Contingency	20%			\$ 115,000
	Extend Power to Irrigation (single phase)				\$ 30,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction	15%			\$ 86,000
	RPR				\$ 30,000
	Irrigation and Nutrient Management Plan				\$ 15,000
	Land Irrigation Lease/Agreements & Services				\$ 15,000
	Sludge Management Plan per EPA 503				\$ 15,000
	Professional Services (Grant Admin)				\$ 30,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 929,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Table 5-12 - Opinion of Probable O&M Costs, Minor Lagoon Upgrades with Effluent Irrigation

Opinion of Probable Annual Operation & Maintenance Costs					
T-3: Minor Lagoon Upgrades - With Effluent Irrigation System					
#	Item	Qty	Units	Unit Price	Total
1	Operator (Field Operation, moving lines, sampling)	40	HR	\$ 20.00	\$ 800.00
2	NMP logging and updates	20	HR	\$ 20.00	\$ 400.00
3	Power to Irrigation System	2400	KWH	\$ 0.15	\$ 360.00
4	Monitoring & Testing	1	LS	\$ 700.00	\$ 700.00
5	Spare Parts/Repair Maintenance	1	LS	\$ 500.00	\$ 500.00
6	Reserve	1	LS	\$ 500.00	\$ 500.00
TOTAL					\$ 3,300.00

Alt. T-4: Minor Lagoon Upgrades with UV System

This alternative would include sludge removal and completing minor upgrades and repairs to the lagoon structures and piping. Minor lagoon upgrades are an attractive option to deal with the most pressing critical deficiencies and improve water quality without creating significant project costs for the community.

Similar to alternative T-3, the influent splitter and valve structure would be replaced to allow for the proper series operation of the lagoon for optimal treatment and detention time. This alternative would also include minor earthwork operations to build up the existing eroded internal lagoon slopes. Rip rap protection, where missing, would be completed to prevent further degradation of the internal slopes.

This alternative is considered with the addition of an effluent UV treatment to meet the treatment objectives of complying with E. coli permits limits. Similar to alternative T-1, this would include construction of a new building or large accessible vault on the existing lagoon effluent to house UV disinfection equipment.

Design Criteria

To meet the E. coli limits, this alternative would include UV disinfection. Disinfection equipment design criteria is included in Circular DEQ-2, Section 104. Lagoon upgrades will be completed in conformance to Circular DEQ-2 Chapter 90 Biological Treatment Section 93 – Wastewater Treatment Ponds, where applicable to the proposed scope of work.

Map

See Figure 5-6 for the conceptual layout of minor upgrades with UV Treatment. A conceptual UV system schematic is found in Figure 5-3.

Environmental impacts

The anticipated environmental impacts will be insignificant with the work taking place in the existing footprint of the lagoons. Construction disturbances include temporary dust and noise from heavy construction equipment. The removal of accumulated sludge will greatly improve the treatment capacity of the system and water quality of the effluent. The sludge biosolids will provide beneficial reuse on existing crop lands if land application methods are used for disposal. Overall environmental impacts will be improved by the project.

The effluent will be required to meet effluent limits set by the permit and would lead to the longterm benefit of discharging a higher quality treated wastewater effluent.

Land Requirements

The new UV treatment building would be installed within the existing Town-owned lagoon site. No additional land would be needed for this installation.

Potential Construction Problems

No specific construction problems are anticipated with the construction of a new UV treatment building.

Sustainability Considerations

By the installation of a disinfection treatment system, the Town would have a reliable means to operate the treatment facility without exceeding permit limits.

Water and Energy Efficiency

To meet the disinfection requirements of the discharge permit, this alternative will require a new UV treatment building at the lagoon effluent pipe. The preliminary system equipment design, which varies per manufacturer,

would include a demand of around 4.2 kW. The estimated annual power consumption, when the system is batch discharging, at up to 2 months per year, is estimated to be approximately 6,800 kwh for an estimated cost of \$1,100 per year.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

The estimated cost for this alternative is summarized below in Table 5-13, below. Table 5-14 shows the estimated O&M increase for this alternative.





Table 5-13 - Opinion of Probable Cost, Minor Lagoon Upgrades with UV

Opinion of Probable Cost T-4: Minor Lagoon Upgrades - With UV System					
#	Bid Item	Qty	Units	Unit Price ¹	Total
1	Exploratory Excavation	20	HR	\$ 250.00	\$ 5,000
2	Transfer Pumping	1	LS	\$ 10,000.00	\$ 10,000
3	Sludge Removal and Disposal	1	LS	\$ 250,000.00	\$ 250,000
4	Berm Embankments Earthwork	800	CY	\$ 20.00	\$ 16,000
5	Connect to Existing Influent Sewer	1	EA	\$ 5,000.00	\$ 5,000
6	Replace Influent Splitter Structure and Piping	1	EA	\$ 15,000.00	\$ 15,000
7	Rip Rap Slope Protection	500	CY	\$ 55.00	\$ 27,500
8	Livestock Fencing around irrigation site	2,000	LF	\$ 10.00	\$ 20,000
9	UV Treatment Vault Sitework	1	LS	\$ 150,000.00	\$ 150,000
10	Furnish & Install UV Disinfection System & Piping	1	LS	\$ 150,000.00	\$ 150,000
11	UV Building Electrical	1	LS	\$ 50,000.00	\$ 50,000
Direct Construction Subtotal					\$ 699,000
Mobilization				10%	\$ 70,000
Construction Subtotal					\$ 769,000
2024 Construction Cost ²				8.0%	\$ 897,000
Contingency				20%	\$ 179,000
Extend Power to UV Site					\$ 30,000
Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				15%	\$ 130,000
RPR				5%	\$ 44,000
Sludge Management Plan per EPA 503					\$ 15,000
Professional Services (Grant Admin)					\$ 30,000
Legal & Administrative					\$ 20,000
TOTAL					\$ 1,345,000

Table 5-14 - Opinion of Probable O&M Costs, Minor Lagoon Upgrades with UV

Opinion of Probable Annual Operation & Maintenance Costs T-4: Minor Lagoon Upgrades - With UV System					
#	Item	Qty	Units	Unit Price	Total
1	Operator	60	HR	\$ 20.00	\$ 1,200.00
2	UV Power	6800	KWH	\$ 0.15	\$ 1,020.00
3	Monitoring & Testing	1	LS	\$ 700.00	\$ 700.00
4	Spare Parts/Repair Maintenance	1	LS	\$ 500.00	\$ 500.00
5	Reserve	1	LS	\$ 500.00	\$ 500.00
TOTAL					\$ 3,900.00

Alt. T-5: Minor Lagoon Upgrades Only

This alternative would only include minor upgrade to the lagoon similar to T-3 and T-4. However, with the focus of improvements on replacing more piping and providing I&I reductions, reduced influent flows would give the Town more flexibility to hold the treated water in the storage cell, and discharge only at times when the effluent is verified to meet permit limits.

Given the degraded condition of the collection system and current high I&I flows, a higher priority should be given to collection system improvements over major lagoon or treatment upgrades. The removal of sludge and replacement of the broken influent splitter structure will improve treatment performance. Focusing on collection system improvements will also reduce the influent flows which would increase detention times in the existing lagoon system. The Town currently only discharges 1-2 times per year and having even lesser influent flows will give the Town more flexibility to hold the treated lagoon water, perform pre-discharge sampling and testing (BOD, TSS, E. coli), and then discharge at times when it is assured that effluent limits can be met for E. coli, BOD and TSS.

The benefit of this option would provide a much more affordable project for the Town and allow for funding resources to be directed to the critical collection system issues. With improvements to the treatment and with a reduction in inflow, the Town will have the ability to discharge at a time that they will meet the permit limits.

This alternative would include sludge removal and completing minor upgrades and repairs to the lagoon structures. Minor lagoon upgrades are an attractive option to deal with the most pressing critical deficiencies and improve water quality without creating significant project costs for the community.

Similar to alternative T-3, the influent splitter and valve structure would be replaced to allow for the proper series operation of the lagoon for optimal treatment and detention time. This alternative would also include minor earthwork operations to build up the existing eroded internal lagoon slopes. Rip rap protection, where missing, would be completed to prevent further erosion.

Design Criteria

Lagoon upgrades will be completed in conformance to Circular DEQ-2 Chapter 90 Biological Treatment Section 93 – Wastewater Treatment Ponds, where applicable to the proposed scope of work.

Map

See Figure 5-6 for the conceptual layout of minor upgrades. However, this alternative will not have a UV system installed.

Environmental impacts

The anticipated environmental impacts will be insignificant with the work taking place in the existing footprint of the lagoons. Construction disturbances include temporary dust and noise from heavy construction equipment.

The effluent quality would be improved to meet the effluent limits set by the permit and would lead to the long-term benefit of discharging a higher quality treated wastewater effluent.

Land Requirements

Additional land would be needed for this installation.

Potential Construction Problems

No specific construction problems are anticipated with this alternative.

Sustainability Considerations

By removing sludge and upgrading the influent structure for property in-series operation, the Town would have a reliable means to operate the treatment facility to achieve permit limits.

Water and Energy Efficiency

No additional power is required for this alternative.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

The estimated cost for this alternative is summarized below in Table 5-15, below. No O&M cost increases are assumed are included within the Town's current O&M budget.

Table 5-15 - Opinion of Probable Cost, Minor Lagoon Upgrades Only

Opinion of Probable Cost					
T-5: Minor Lagoon Upgrades Only					
#	BID ITEM	QTY	UNITS	UNIT PRICE ¹	TOTAL
1	Exploratory Excavation	20	HR	\$ 250.00	\$ 5,000
2	Transfer Pumping	1	LS	\$ 10,000.00	\$ 10,000
3	Sludge Removal and Disposal	1	LS	\$ 250,000.00	\$ 250,000
4	Berm Embankments Embankment	800	CY	\$ 20.00	\$ 16,000
5	Connect to Existing Influent Sewer	1	EA	\$ 5,000.00	\$ 5,000
6	Replace Influent Splitter Structure and Piping	1	EA	\$ 15,000.00	\$ 15,000
7	Rip Rap Slope Protection	500	CY	\$ 55.00	\$ 27,500
8	Livestock Fencing around irrigation site	2,000	LF	\$ 10.00	\$ 20,000
Direct Construction Subtotal					\$ 349,000
	Mobilization			10%	\$ 35,000
Construction Subtotal					\$ 384,000
	2024 Construction Cost ²			8.0%	\$ 448,000
	Contingency			20%	\$ 90,000
	Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction				\$ 80,000
	RPR				\$ 30,000
	Sludge Management Plan per EPA 503				\$ 15,000
	Professional Services (Grant Admin)				\$ 30,000
	Legal & Administrative				\$ 20,000
TOTAL					\$ 713,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Alt. T-6: UV System Upgrades Only

This alternative would include only the installation of a new UV treatment system done as a standalone and independent project from any other lagoon treatment improvements. This alternative could be completed with or without other lagoon treatment upgrades.

This alternative would only include the installation of an effluent UV treatment to meet the treatment objectives of complying with E. coli permits limits. Like alternative T-1, this would include construction of a new building or large accessible vault on the existing lagoon effluent to house UV disinfection equipment.

Design Criteria

To meet the E. coli limits, this alternative would include UV disinfection. Disinfection equipment design criteria is included in Circular DEQ-2, Section 104.

Map

See Figure 5-6 for the conceptual layout showing the location of a potential UV Treatment system. The difference with this alternative is Lagoon improvements are not included. A conceptual UV system schematic is found in Figure 5-3.

Environmental impacts

The effluent will be required to meet effluent limits set by the permit and would lead to the longterm benefit of discharging a higher quality treated wastewater effluent.

Land Requirements

The new UV treatment building would be installed within the existing Town-owned lagoon site. No additional land would be needed for this installation.

Potential Construction Problems

No specific construction problems are anticipated with the construction of a new UV treatment building.

Sustainability Considerations

By the installation of a disinfection treatment system, the Town would have a reliable means to operate the treatment facility without exceeding permit limits.

Water and Energy Efficiency

To meet the disinfection requirements of the discharge permit, this alternative will require a new UV treatment building at the lagoon effluent pipe. The preliminary system equipment design, which varies per manufacturer, would include a demand of around 4.2 kW. The estimated annual power consumption, when the system is batch discharging, at up to 2 months per year, is estimated to be approximately 6,800 kwh for an estimated cost of \$1,100 per year.

Green Infrastructure

Stormwater management during the project will include temporary erosion and sediment control measures including the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soils and transport of sediment offsite from construction activities. The Contractor will be required to complete and adhere to a Storm Water Pollution Prevention Plan (SWPPP).

Cost Estimates

The estimated cost for this alternative is summarized below in Table 5-16, below. Table 5-17 shows the estimated O&M increase for this alternative.

Table 5-16 - Opinion of Probable Cost, UV System Upgrades Only

Opinion of Probable Cost					
T-6: UV System Upgrades Only					
#	Bid Item	Qty	Units	Unit Price ¹	Total
1	UV Treatment Vault Sitework	1	LS	\$ 150,000.00	\$ 150,000
2	Furnish & Install UV Disinfection System & Piping	1	LS	\$ 150,000.00	\$ 150,000
3	UV Building Electrical	1	LS	\$ 50,000.00	\$ 50,000
Direct Construction Subtotal					\$ 350,000
Mobilization		10%			\$ 35,000
Construction Subtotal					\$ 385,000
2024 Construction Cost ²		8.0%			\$ 449,000
Contingency		20%			\$ 90,000
Extend Power to UV Site					\$ 30,000
Basic Engineering Services - Preliminary Design, Final Design, Bidding, Construction, Post Construction					\$ 67,000
RPR					\$ 30,000
Professional Services (Grant Admin)					\$ 30,000
Legal & Administrative					\$ 20,000
TOTAL					\$ 716,000

¹ Estimated unit costs are based upon estimates from suppliers and bid tabs for similar projects throughout Montana.

² The ENR 20-year average Construction Cost Index is +8.0% (as of January 2022), so capital costs are projected to an anticipated construction date in 2024 using an 8% inflation rate.

Table 5-17 - Opinion of Probable O&M Costs, UV System Only

Opinion of Probable Annual Operation & Maintenance Costs					
T-6: With UV System Upgrades Only					
#	Item	Qty	Units	Unit Price	Total
1	Operator	60	HR	\$ 20.00	\$ 1,200.00
2	UV Power	6,800	KWH	\$ 0.15	\$ 1,020.00
3	Monitoring & Testing	1	LS	\$ 700.00	\$ 700.00
4	Spare Parts/Repair Maintenance	1	LS	\$ 500.00	\$ 500.00
5	Reserve	1	LS	\$ 500.00	\$ 500.00
TOTAL					\$ 3,900.00

Step 7: *Determination of No Practicable Alternative*

It was the Town of Saco's determination that there is no practicable alternative for the collection system replacement or rehabilitation of the lagoons near the 100-year floodplain.

Step 8: *Implement the Proposed Action*

The Town will ensure that this plan, as modified and described above, is executed, and necessary language will be included in all agreements with participating parties. The town will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur or unnecessary risks are taken.

**Early Notice and Public Review of a Proposed
Activity in a Federal Flood Risk Management Standard Designated Floodplain**

To: All interested Agencies, Groups, and Individuals

This is to give notice that the Town of Saco has determined that the following proposed action under the Community Development Block Grant contract CDBG-23-PF-02 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain, and the Town of Saco will be identifying and evaluating practicable alternatives to locating the action within the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project location is 48°27'10.5"N 107°20'10.6"W in Saco, Phillips County. The extent of the FFRMS floodplain was determined using 0.2 percent flood approach and the Freeboard Value Approach.

The proposed project entails a comprehensive upgrade of the existing wastewater collection and treatment systems, aimed at enhancing operational efficiency and ensuring compliance with regulatory standards. This initiative encompasses two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 improvements will involve replacing and installing approximately 1,700 feet of wastewater pipe, along with related manholes and services. New collection pipe work will extend from the lift station location north under highway and railroad crossings, utilizing bore and jacking methods, and will include the intersection of Vagg St. and 4th Ave., as well as the installation or rehabilitation of a new sewer main within Nelson St. from Taylor St. to Vagg St. Additionally, the project will address rehabilitation of pipes along Highway 2 (Taylor Street) from 1st St. to Nelson St. Meanwhile, the lagoon upgrades will include minor repairs to the lagoon berms and minor earthwork grading operations to restore existing eroded slopes, complemented by the installation of riprap for further erosion control.

In terms of floodplain considerations, the project may impact approximately 1.5 acres of floodplains located at the existing treatment facility, which are classified under the Federal Flood Risk Management Standard (FFRMS). This floodplain serves several vital functions, including floodwater storage and conveyance, groundwater discharge and recharge, erosion control, water quality maintenance, and providing habitat for diverse flora and fauna. Overall, while the proposed wastewater system upgrades and lagoon improvements are essential for meeting operational demands and environmental standards, careful consideration and assessments will be necessary to ensure the protection of the floodplain's key natural functions and intrinsic values.

This notice serves three main purposes. First, it offers the public—especially those affected by floodplain activities—a chance to voice concerns and share information. Commenters are encouraged to suggest alternative sites, methods, and ways to reduce impacts on the floodplain. Second, a solid public notice program educates the community, helping to inform Federal efforts in reducing floodplain risks. Lastly, it's important for fairness that the Federal government informs those who may face increased risks from actions in floodplains.

Written comments must be received by the Town of Saco at the following address on or before February 11, 2025: Town of Saco, PO Box 330, Saco, MT 59261 and (406) 527-3312, Attention: Wayne Woodall, Mayor. A full description of the project may also be reviewed from 9:00 a.m. to 1:00 p.m. at 110 Nelson St., Saco, MT 59261. Comments may also be submitted via email at townsaco@nemont.net. A public hearing is scheduled at 7:00 p.m. on February 12, 2025, at the Town Hall, 110 Nelson St., Saco, MT 59621.

Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain

To: All interested Agencies, Groups, and Individuals

This is to give notice that the Town of Saco has conducted an evaluation as required by Executive Order(s) 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded Community Development Block Grant contract CDBG-23-PF-02. The proposed project location is 48°27'10.5"N 107°20'10.6"W in Saco, Phillips County, and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using a 0.2 percent flood approach. In terms of floodplain considerations, the project may impact approximately 1.5 acres of floodplains located at the existing treatment facility, which are classified under the Federal Flood Risk Management Standard (FFRMS). This floodplain serves several vital functions, including floodwater storage and conveyance, groundwater discharge and recharge, erosion control, water quality maintenance, and providing habitat for diverse flora and fauna. Overall, while the proposed wastewater system upgrades and lagoon improvements are essential for meeting operational demands and environmental standards, careful consideration and assessments will be necessary to ensure the protection of the floodplain's key natural functions and intrinsic values.

The Town of Saco has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland: The project includes placing additional rip rap erosion control within the existing lagoon cells' interior slopes. No other alternatives exist without fully reconstructing the lagoon cell. The rip rap will extend the life of the two existing lagoon cells and protect the system from further internal erosion from wave and wind action. The project also proposes to replace sewer collection piping within the existing sewer main alignments for improvements within the Town limits and within the existing flood plain levee. No other alternatives exist for the pipeline replacement and rehabilitation, which proposes to replace or rehabilitate the existing 70-80-year-old clay sewer piping. No additional cut or fill in the floodplain will result from the activities. A floodplain permit will be obtained from Phillips County for the associated work.

The Town of Saco has reevaluated alternatives to building in the floodplain and has determined that no practicable alternative to floodplain development exists. Environmental files documenting compliance with Executive Order 11988, as amended by Executive Order 13690, are available for public inspection, review, and copying upon request at the times and locations delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in the floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about the floodplain can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in the floodplain, it must inform those who may be put at greater or continued risk.

Written comments must be received by the Town of Saco at the following address on or before June 10, 2025: Town of Saco, PO Box 330, Saco, MT 59261 and (406) 527-3312, Attention: Wayne Woodall, Mayor. A full description of the project may also be reviewed from 9:00 a.m. to 1:00 p.m. at 110 Nelson St., Saco, MT 59261. Comments may also be submitted via email at townsaco@nemont.net. A public hearing is scheduled at 5:30 p.m. on June 11, 2025, at the Town Hall, 110 Nelson St., Saco, MT 59621.

AFFIDAVIT OF PUBLICATION

STATE OF MONTANA,

County of Phillips

Wanda Bushman, is the Office Manager of the Phillips County News, a newspaper of general circulation, published weekly at Malta, Phillips County, Montana; that the notice hereto attached and entitled

Public Notice- Saco Floodplains

has been published in the said newspaper once each week for 2 two successive weeks as follows: the said

notice was published in said paper on 8/6, 2025

it was also published in said paper on 8/13, 2025

it was also published in said paper on _____, 2025

it was also published in said paper on _____, 2025

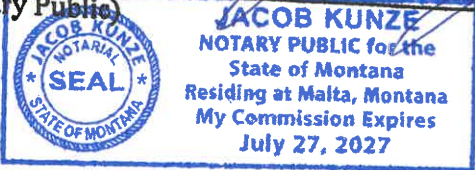
by Wanda Bushman

This instrument was acknowledged before me

this 18 day of August, 2025

Jacob Kunze

(Notary Public)



PUBLIC NOTICE

Early Notice and Public Review of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain

To: All interested Agencies, Groups, and Individuals:

This is to give notice that the Town of Saco has determined that the following proposed action under the Community Development Block Grant contract CDBG-23-PF-02 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain, and the Town of Saco will be identifying and evaluating practicable alternatives to locating the action within the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project location is 48°27'39.105"N 107°20'39.106"W in Saco, Phillips County. The extent of the FFRMS floodplain was determined using 0.2 percent flood approach and the Freeboard Value Approach.

The proposed project entails a comprehensive upgrade of the existing wastewater collection and treatment systems, aimed at enhancing operational efficiency and ensuring compliance with regulatory standards. This initiative encompasses two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 improvements will involve replacing and installing approximately 1,700 feet of wastewater pipe, along with related manholes and services. New collection pipe work will extend from the lift station location north under highway and railroad crossings, utilizing bore and jacking methods, and will include the intersection of Vagg St. and 4th Ave., as well as the installation or rehabilitation of a new sewer main within Nelson St. from Taylor St. to Vagg St. Additionally, the project will address rehabilitation of pipes along Highway 2 (Taylor Street) from 1st St. to Nelson St. Meanwhile, the lagoon upgrades will include minor repairs to the lagoon berms and minor earthwork grading operations to restore existing eroded slopes, complemented by the installation of riprap for further erosion control.

In terms of floodplain considerations, the project may impact approximately 1.5 acres of floodplains located at the existing treatment facility, which are classified under the Federal Flood Risk Management Standard (FFRMS). This floodplain serves several vital functions, including floodwater storage and conveyance, groundwater discharge and recharge, erosion control, water quality maintenance, and providing habitat for diverse flora and fauna. Overall, while the proposed wastewater system upgrades and lagoon improvements are essential for meeting operational demands and environmental standards, careful consideration and assessments will be necessary to ensure the protection of the floodplain's key natural functions and intrinsic values.

This notice serves three main purposes. First, it offers the public—especially those affected by floodplain activities—a chance to voice concerns and share information. Commenters are encouraged to suggest alternative sites, methods, and ways to reduce impacts on the floodplain. Second, a solid public notice program educates the community, helping to inform Federal efforts in reducing floodplain risks. Lastly, it's important for fairness that the Federal government informs those who may face increased risks from actions in floodplains.

Written comments must be received by the Town of Saco at the following address on or before August 21st, 2025, by 5:00 p.m.:
Town of Saco, PO Box 330, Saco, MT 59261 and (406) 527-3312
Attention: Wayne Woodall, Mayor.

A full description of the project may also be reviewed from 9:00 a.m. to 1:00 p.m. at 110 Nelson St., Saco, MT 59261. Comments may also be submitted via email at townsaco@nemont.net.

(Published by Phillips County News 8/6, & 8/13/25)
MNXLP

Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain

To: All interested Agencies, Groups, and Individuals

This is to give notice that the Town of Saco has conducted an evaluation as required by Executive Order(s) 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded Community Development Block Grant contract CDBG-23-PF-02. The proposed project location is 48°27'10.5"N 107°20'10.6"W in Saco, Phillips County, and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using a 0.2 percent flood approach. In terms of floodplain considerations, the project may impact approximately 1.5 acres of floodplains located at the existing treatment facility, which are classified under the Federal Flood Risk Management Standard (FFRMS). This floodplain serves several vital functions, including floodwater storage and conveyance, groundwater discharge and recharge, erosion control, water quality maintenance, and providing habitat for diverse flora and fauna. Overall, while the proposed wastewater system upgrades and lagoon improvements are essential for meeting operational demands and environmental standards, careful consideration and assessments will be necessary to ensure the protection of the floodplain's key natural functions and intrinsic values.

The Town of Saco has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland: The project includes placing additional rip rap erosion control within the existing lagoon cells' interior slopes. No other alternatives exist without fully reconstructing the lagoon cell. The rip rap will extend the life of the two existing lagoon cells and protect the system from further internal erosion from wave and wind action. The project also proposes to replace sewer collection piping within the existing sewer main alignments for improvements within the Town limits and within the existing flood plain levee. No other alternatives exist for the pipeline replacement and rehabilitation, which proposes to replace or rehabilitate the existing 70-80-year-old clay sewer piping. No additional cut or fill in the floodplain will result from the activities. A floodplain permit will be obtained from Phillips County for the associated work.

The Town of Saco has reevaluated alternatives to building in the floodplain and has determined that no practicable alternative to floodplain development exists. Environmental files documenting compliance with Executive Order 11988, as amended by Executive Order 13690, are available for public inspection, review, and copying upon request at the times and locations delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in the floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about the floodplain can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in the floodplain, it must inform those who may be put at greater or continued risk.

Written comments must be received by the Town of Saco at the following address on or before September 4th, 2025 by 5:00 p.m.: Town of Saco, PO Box 330, Saco, MT 59261 and (406) 527-3312, Attention: Wayne Woodall, Mayor. A full description of the project may also be reviewed from 9:00 a.m. to 1:00 p.m. at 110 Nelson St., Saco, MT 59261. Comments may also be submitted via email at townsaco@nemont.net.

AFFIDAVIT OF PUBLICATION

STATE OF MONTANA,

County of Phillips

Wanda Bushman is the Office Manager of the Phillips County News, a newspaper of general circulation, published weekly at Malta, Phillips County, Montana; that the notice hereto attached and entitled

Legal Notice
Saco Floodplain

has been published in the said newspaper once each week for

1 (one) successive weeks as follows: the said

notice was published in said paper on 8/27, 2025

it was also published in said paper on _____, 2025

it was also published in said paper on _____, 2025

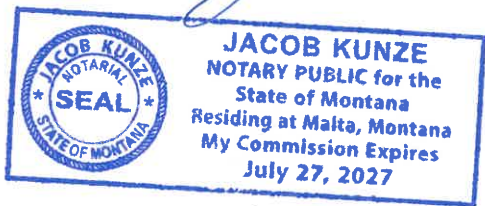
it was also published in said paper on _____, 2025

by Wanda Bushman

This instrument was acknowledged before me

this 22 day of September, 2025

Jacob Kunze
(Notary Public)



LEGAL NOTICE

Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain

To: All interested Agencies, Groups, and Individuals
This is to give notice that the Town of Saco has conducted an evaluation as required by Executive Order(s) 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded Community Development Block Grant contract CDBG-23-PF-02. The proposed project location is 48°27'10.5"N 107°20'10.6"W in Saco, Phillips County, and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using a 0.2 percent flood approach. In terms of floodplain considerations, the project may impact approximately 1.5 acres of floodplains located at the existing treatment facility, which are classified under the Federal Flood Risk Management Standard (FFRMS). This floodplain serves several vital functions, including floodwater storage and conveyance, groundwater discharge and recharge, erosion control, water quality maintenance, and providing habitat for diverse flora and fauna. Overall, while the proposed wastewater system upgrades and lagoon improvements are essential for meeting operational demands and environmental standards, careful consideration and assessments will be necessary to ensure the protection of the floodplain's key natural functions and intrinsic values. The Town of Saco has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland: The project includes placing additional rip rap erosion control within the existing lagoon cells' interior slopes. No other alternatives exist without fully reconstructing the lagoon cell. The rip rap will extend the life of the two existing lagoon cells and protect the system from further internal erosion from wave and wind action. The project also proposes to replace sewer collection piping within the existing sewer main alignments for improvements within the Town limits and within the existing flood plain levee. No other alternatives exist for the pipeline replacement and rehabilitation, which proposes to replace or rehabilitate the existing 70-80-year-old clay sewer piping. No additional cut or fill in the floodplain will result from the activities. A floodplain permit will be obtained from Phillips County for the associated work. The Town of Saco has reevaluated alternatives to building in the floodplain and has determined that no practicable alternative to floodplain development exists. Environmental files documenting compliance with Executive Order 11988, as amended by Executive Order 13690, are available for public inspection, review, and copying upon request at the times and locations delineated in the last paragraph of this notice for receipt of comments. There are three primary purposes for this notice. First, people who may be affected by activities in the floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about the floodplain can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in the floodplain, it must inform those who may be put at greater or continued risk.
Written comments must be received by the Town of Saco at the following address on or before September 4th, 2025 by 5:00 p.m.: Town of Saco, PO Box 330, Saco, MT 59261 and (406) 527-3312, Attention: Wayne Woodall, Mayor. A full description of the project may also be reviewed from 9:00 a.m. to 1:00 p.m. at 110 Nelson St., Saco, MT 59261. Comments may also be submitted via email at townsaco@nemont.net.

(Published by Phillips County News 8/27/25)
MNAXLP

APPENDIX D

Clean Air



You are here: EPA Home > Green Book > >National Area and County-Level Multi-Pollutant Information >Montana Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants

Montana Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants

Data is current as of May 31, 2025

Listed by County, NAAQS, Area. The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

* The 1997 Primary Annual PM-2.5 NAAQS (level of 15 µg/m³) is revoked in attainment and maintenance areas for that NAAQS. For additional information see the PM-2.5 NAAQS SIP Requirements Final Rule, effective October 24, 2016. (81 FR 58009)

Change the State:

MONTANA

Important Notes

Download National Dataset: [dbf](#) | [xls](#) | [Data dictionary \(PDF\)](#)

County	NAAQS	Area Name	Nonattainment in Year	Redesignation to Maintenance	Classification	Whole or/Part County	Population (2010)	State/County FIPS Codes
MONTANA								
Cascade County	Carbon Monoxide (1971)	Great Falls, MT	92939495969798990001	07/08/2002	Not Classified	Part	57,573	30/013
Flathead County	PM-10 (1987)	Flathead County; Columbia Falls and vicinity, MT	92939495969798990001020304050607080910111213141516171819	07/27/2020	Moderate	Part	4,610	30/029
Flathead County	PM-10 (1987)	Flathead County; Kalispell and vicinity, MT	92939495969798990001020304050607080910111213141516171819	07/27/2020	Moderate	Part	18,422	30/029
Flathead County	PM-10 (1987)	Flathead County; Whitefish and vicinity, MT	9394959697989900010203040506070809101112131415161718192021	07/08/2022	Moderate	Part	6,138	30/029
Lake County	PM-10 (1987)	Lake County; Polson, MT	92939495969798990001020304050607080910111213141516171819202122232425	//	Moderate	Part	4,099	30/047
Lake County	PM-10 (1987)	Lake County; Ronan, MT	92939495969798990001020304050607080910111213141516171819202122232425	//	Moderate	Part	2,734	30/047

County	NAAQS	Area Name	Nonattainment in Year	Redesignation to Maintenance	Classification	Whole or/ Part County	Population (2010)	State/ County FIPS Codes
Lewis and Clark County	Lead (1978)	Lewis & Clark County (part); City of East Helena and vicinity, MT	929394959697989900010203040506070809101112131415161718	10/11/2019		Part	2,669	30/049
Lewis and Clark County	Sulfur Dioxide (1971)	East Helena Area, MT	929394959697989900010203040506070809101112131415161718	10/11/2019		Part	2,669	30/049
Lincoln County	PM-10 (1987)	Lincoln County; Libby and vicinity, MT	92939495969798990001020304050607080910111213141516171819	07/27/2020	Moderate	Part	3,378	30/053
Lincoln County	PM-2.5 (1997)-NAAQS revoked	Libby, MT	050607080910111213141516171819202122	08/23/2023 *	Moderate	Part	9,429	30/053
Missoula County	Carbon Monoxide (1971)	Missoula, MT	929394959697989900010203040506	09/17/2007	Moderate <= 12.7ppm	Part	59,733	30/063
Missoula County	PM-10 (1987)	Missoula, MT	929394959697989900010203040506070809101112131415161718	06/24/2019	Moderate	Part	59,733	30/063
Rosebud County	PM-10 (1987)	Rosebud County; Lame Deer, MT	92939495969798990001020304050607080910111213141516171819202122232425	//	Moderate	Part	527	30/087
Sanders County	PM-10 (1987)	Sanders County (part); Thompson Falls and vicinity, MT	94959697989900010203040506070809101112131415161718192021	07/08/2022	Moderate	Part	1,317	30/089
Silver Bow County	PM-10 (1987)	Silver Bow County; Butte, MT	9293949596979899000102030405060708091011121314151617181920	07/26/2021	Moderate	Part	34,201	30/093
Yellowstone County	Carbon Monoxide (1971)	Billings, MT	92939495969798990001	04/22/2002	Not Classified	Part	104,360	30/111
Yellowstone County	Sulfur Dioxide (1971)	Laurel Area (Yellowstone County), MT	92939495969798990001020304050607080910111213141516171819202122232425	//		Part	6,525	30/111
Yellowstone County	Sulfur Dioxide (2010)	Billings, MT	131415	06/09/2016		Part	2,621	30/111

Important Notes

Discover.

Connect.

Ask.

Follow.

2025-06-03

Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
Reference		
https://www.hudexchange.info/environmental-review/air-quality		

Scope of Work

- 1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

→ Continue to Question 2.

No

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Air Quality Attainment Status of Project's County or Air Quality Management District

- 2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project's county or air quality management district is in attainment status for all criteria pollutants

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

→ Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed *de minimis* or threshold emissions.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not involve new construction or the conversion of land use for the development of public, commercial, or industrial facilities, nor does it include five or more dwelling units.

https://www3.epa.gov/airquality/greenbook/anayo_mt.html

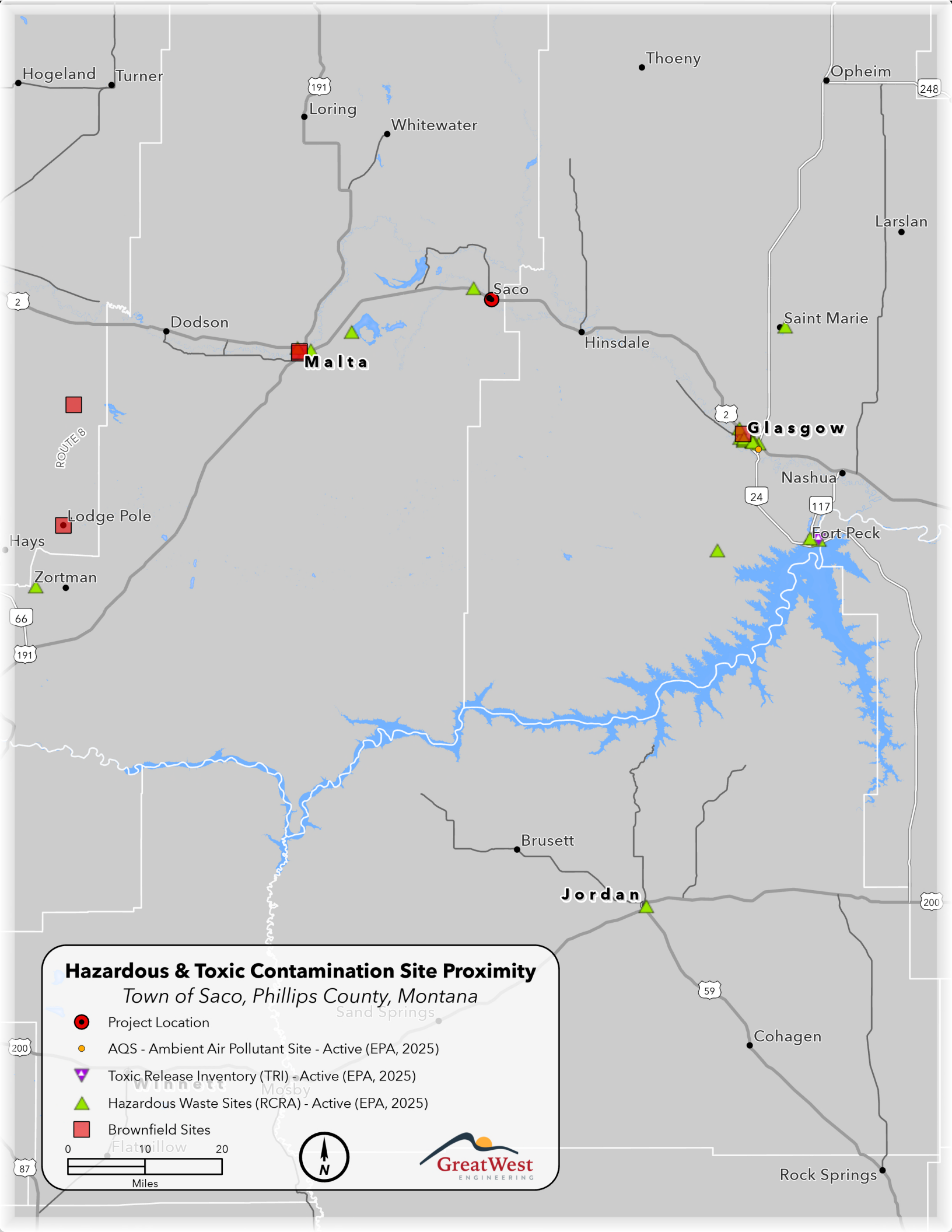
Are formal compliance steps or mitigation required?

Yes

No

APPENDIX E

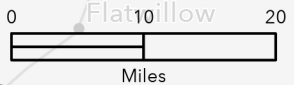
Contamination and Toxic Substances



Hazardous & Toxic Contamination Site Proximity

Town of Saco, Phillips County, Montana

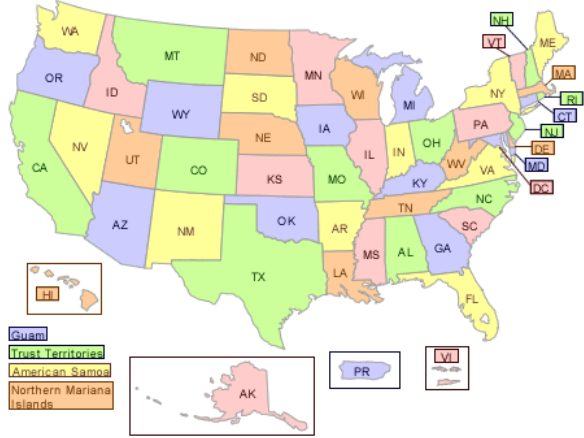
- Project Location
- AQS - Ambient Air Pollutant Site - Active (EPA, 2025)
- ▼ Toxic Release Inventory (TRI) - Active (EPA, 2025)
- ▲ Hazardous Waste Sites (RCRA) - Active (EPA, 2025)
- Brownfield Sites



National Priorities List (NPL) Sites - by State

[View NPL Sites - by Site Name <<https://epa.gov/superfund/national-priorities-list-npl-sites-site-name>>] | [View NPL Sites - by Date <<https://epa.gov/superfund/national-priorities-list-npl-sites-listing-date>>]

Choose a state or territory from the map or list below.



This page provides information about sites listed on the NPL; including Site Name, City, Site EPA ID, Listing Date, Site Score, and Federal Facility Indicator. Links to the Site Narrative, Site Progress Profile, and Federal Register Notice are provided in the Additional Information column. The Site Location column contains a link to a map with the site location. Select a state from the map for a list of NPL sites in that state.

(1343 Sites as of March 13, 2026)

Alabama (12 sites)							
Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
Alabama Army Ammunition Plant	Childersburg	AL6210020008	07/22/1987	36.83	Yes	<ul style="list-style-type: none"> Site Listing Narrative <https://semsub.epa.gov/src/document/04/11121411> Site Progress Profile Federal Register Notice (PDF) <https://semsub.epa.gov/src/document/11/189629> (27 pp, 287 K) 	Site Location
Alabama Plating Company, Inc.	Vincent	ALD004022448	09/18/2012	30.20	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semsub.epa.gov/src/document/04/11121061> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2012-09-18/pdf/2012-22851.pdf> (10 pp, 261 K) 	Site Location
American Brass	Headland	ALD981868466	05/10/1999	55.61	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semsub.epa.gov/src/document/04/11121379> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-1999-05-10/pdf/99-11705.pdf> (8 pp, 189 K) 	Site Location
Anniston Army Depot (Southeast Industrial Area)	Anniston	AL3210020027	03/13/1989	51.91	Yes	<ul style="list-style-type: none"> Site Listing Narrative <https://semsub.epa.gov/src/document/04/11121396> Site Progress Profile Federal Register Notice (PDF) <https://semsub.epa.gov/src/document/11/189630> (11 pp, 136 K) 	Site Location
Ciba-Geigy Corp. (McIntosh Plant)	McIntosh	ALD001221902	09/21/1984	53.42	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semsub.epa.gov/src/document/04/11121407> Site Progress Profile Federal Register Notice (PDF) <https://semsub.epa.gov/src/document/11/189627> (22 pp, 177 K) 	Site Location

Missouri (33 sites)							
Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
Washington County Lead District - Old Mines	Old Mines	MON000705027	03/19/2008	76.81	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296027> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2008-03-19/pdf/e8-5557.pdf> (9 pp, 214 K) 	Site Location
Washington County Lead District - Potosi	Potosi	MON000705023	03/19/2008	50.00	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296028> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2008-03-19/pdf/e8-5557.pdf> (9 pp, 214 K) 	Site Location
Washington County Lead District - Richwoods	Richwoods	MON000705032	03/19/2008	76.81	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296029> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2008-03-19/pdf/e8-5557.pdf> (9 pp, 214 K) 	Site Location
Weldon Spring Former Army Ordnance Works	St. Charles County	MO5210021288	02/21/1990	30.26	Yes	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296203> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189635> (21 pp, 326 K) 	Site Location
Weldon Spring Quarry/Plant/Pits (USDOE/Army)	St. Charles County	MO3210090004	07/22/1987	58.60	Yes	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296134> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189629> (27 pp, 287 K) 	Site Location
Westlake Landfill	Bridgeton	MOD079900932	08/30/1990	29.85	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296142> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189637> (22 pp, 293 K) 	Site Location

Top of page

Montana (18 sites)							
Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
ACM Smelter and Refinery	Black Eagle	MTD093291599	03/10/2011	54.26	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/1570671> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2011-03-10/pdf/2011-5337.pdf> (9 pp, 179 K) 	Site Location
Anaconda Aluminum Co Columbia Falls Reduction Plant	Columbia Falls	MTD057561763	09/09/2016	68.39	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/1570788> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2016-09-09/pdf/2016-21615.pdf> (7 pp, 245 K) 	Site Location

Montana (18 sites)

Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
Anaconda Co. Smelter	Anaconda	MTD093291656	09/08/1983	58.71	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000209> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189620> (36 pp, 441 K) 	Site Location
Barker Hughesville Mining District	Barker	MT6122307485	09/13/2001	50.00	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000187> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2001-09-13/pdf/01-22741.pdf> (9 pp, 193 K) 	Site Location
Basin Mining Area	Basin	MTD982572562	10/22/1999	61.15	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000181> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-1999-10-22/pdf/99-27537.pdf> (8 pp, 187 K) 	Site Location
Billings PCE	Billings	MTD986073252	09/09/2021	50.00	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/hq/400931> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2021-09-09/pdf/2021-19193.pdf> (7 pp, 280 K) 	Site Location
Carpenter Snow Creek Mining District	Neihart	MT0001096353	09/13/2001	50.00	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000188> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2001-09-13/pdf/01-22741.pdf> (9 pp, 193 K) 	Site Location
East Helena Site	East Helena	MTD006230346	09/21/1984	61.65	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000213> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189627> (22 pp, 177 K) 	Site Location
Flat Creek IMM	Superior	MT0012694970	09/23/2009	51.33	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/1570670> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2009-09-23/pdf/e9-22934.pdf> (10 pp, 170 K) 	Site Location
Idaho Pole Co.	Bozeman	MTD006232276	06/10/1986	38.29	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000215> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189628> (34 pp, 369 K) 	Site Location
Libby Asbestos	Libby	MT0009083840	10/24/2002		No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000192> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2002-10-24/pdf/02-27127.pdf> (7 pp, 187 K) 	Site Location

Montana (18 sites)							
Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
Libby Ground Water Contamination	Libby	MTD980502736	09/08/1983	37.67	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000210> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189620> (36 pp, 441 K) 	Site Location
Lockwood Solvent Ground Water Plume	Billings	MT0007623052	12/01/2000	45.69	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000186> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-2000-12-01/pdf/00-30630.pdf> (8 pp, 272 K) 	Site Location
Milltown Reservoir Sediments	Milltown	MTD980717565	09/08/1983	43.78	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000211> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189620> (36 pp, 441 K) 	Site Location
Montana Pole and Treating	Butte	MTD006230635	07/22/1987	33.03	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000217> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189629> (27 pp, 287 K) 	Site Location
Mouat Industries	Columbus	MTD021997689	06/10/1986	31.66	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000216> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189628> (34 pp, 369 K) 	Site Location
Silver Bow Creek/Butte Area	Silver Bow Creek	MTD980502777	09/08/1983	63.76	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000212> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189620> (36 pp, 441 K) 	Site Location
Upper Tenmile Creek Mining Area	Helena, Rimini	MTSFN7578012	10/22/1999	50.00	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/08/100000183> Site Progress Profile Federal Register Notice (PDF) <http://www.gpo.gov/fdsys/pkg/fr-1999-10-22/pdf/99-27537.pdf> (8 pp, 187 K) 	Site Location

Top of page

Nebraska (18 sites)							
Site Name	City	Site EPA ID	Listing Date	Site Score	Federal Facility Indicator	Additional Information	Site Location
10th Street Site	Columbus	NED981713837	08/30/1990	28.90	No	<ul style="list-style-type: none"> Site Listing Narrative <https://semspub.epa.gov/src/document/07/30296140> Site Progress Profile Federal Register Notice (PDF) <https://semspub.epa.gov/src/document/11/189637> (22 pp, 293 K) 	Site Location

Search for Superfund Sites Where You Live

On this page:

- National Priorities List and Superfund Alternative Approach Sites
- Superfund National Priorities List (NPL) Where You Live Map
- Advanced Search: For National Priorities List and Non-NPL Sites
- Cleanups in My Community Mapped Search

National Priorities List and Superfund Alternative Approach Sites

Search for sites proposed to, currently on, and deleted from Superfund's National Priorities List (NPL) <<https://epa.gov/superfund/superfund-national-priorities-list-npl>> as well as sites being addressed under the Superfund Alternative Approach (SAA) <<https://epa.gov/enforcement/superfund-alternative-approach>>.

Select a State

After selecting a state, click Go to display sites in that state.

All

Show entries

Search:

Region	City	County	State	Zip Code	EPA ID	Site Name	NPL Status	Superfund Alternative Agreement?
<input type="button" value="+"/> 08	BLACK EAGLE	CASCADE	Montana	59414	MTD093291599	ACM SMELTER AND REFINERY	Final	No
<input type="button" value="+"/> 08	COLUMBIA FALLS	FLATHEAD	Montana	59912	MTD057561763	ANACONDA ALUMINUM CO COLUMBIA FALLS REDUCTION PLANT	Final	No
<input type="button" value="+"/> 08	ANACONDA	DEER LODGE	Montana	59711	MTD093291656	ANACONDA CO. SMELTER	Final	No
<input type="button" value="+"/> 08	MONARCH	CASCADE	Montana	59469	MT6122307485	BARKER HUGHESVILLE MINING DISTRICT	Final	No
<input type="button" value="+"/> 08	BASIN	JEFFERSON	Montana	59631	MTD982572562	BASIN MINING AREA	Final	No
<input type="button" value="+"/> 08	BILLINGS	YELLOWSTONE	Montana	59101	MTD986073252	BILLINGS PCE	Final	No
<input type="button" value="+"/> 08	NEIHART	CASCADE	Montana	59465	MT0001096353	CARPENTER SNOW CREEK MINING DISTRICT	Final	No
<input type="button" value="+"/> 08	EAST HELENA	LEWIS AND CLARK	Montana	59635	MTD006230346	EAST HELENA SITE	Final	No
<input type="button" value="+"/> 08	SUPERIOR	MINERAL	Montana	59872	MT0012694970	FLAT CREEK IMM	Final	No
<input type="button" value="+"/> 08	BOZEMAN	GALLATIN	Montana	59715	MTD006232276	IDAHO POLE CO.	Final	No

Showing 1 to 10 of 19 entries (filtered from 1,906 total entries)

Previous 2 Next

Data as of 03-27-2026 12:00.

Superfund National Priorities List (NPL) Where You Live Map

*The latitude and longitude coordinates for the sites displayed in the map are derived from Hazard Ranking System documentation records used to support the addition of these sites to the National Priorities List.

View larger map of NPL and SAA sites [↗ <https://experience.arcgis.com/experience/4822dbc3d1c04131a548d4404bb1496a>](https://experience.arcgis.com/experience/4822dbc3d1c04131a548d4404bb1496a)

Advanced Search: For National Priorities List and Non-NPL Sites

Search the Superfund data system for active and archived NPL and non-NPL sites. [<https://cumulis.epa.gov/supercpad/cursites/srchsites.cfm>](https://cumulis.epa.gov/supercpad/cursites/srchsites.cfm)

Cleanups in My Community Mapped Search

View EPA's Cleanups in my Community map [<https://epa.gov/cleanups/cleanups-my-community>](https://epa.gov/cleanups/cleanups-my-community), which includes Superfund sites as well as sites and facilities addressed under other programs.

Last updated on October 1, 2025

Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.hudexchange.info/programs/environmental-review/site-contamination		

1. How was site contamination evaluated? ¹ Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

→ Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- No

Explain:

There are no on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property. The source for this conclusion can be found at these websites:
<https://www.epa.gov/superfund/search-superfund-sites-where-you-live>
<https://www.epa.gov/superfund/national-priorities-list-npl-sites-state#MT>

¹ HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

→ Based on the response, the review is in compliance with this section.
Continue to the Worksheet Summary below.

Yes.

→ Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.

3. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ Provide all mitigation requirements² and documents. Continue to Question 4.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

→ *Continue to the Worksheet Summary.*

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project explicitly does not involve the construction of single- or multi-family homes. Consequently, the regulations outlined in 24 CFR 58.5 and 24 CFR 50.3 are not applicable to this project. Additionally, an assessment was conducted to determine if any on-site or nearby toxic, hazardous, or radioactive substances (excluding radon) could potentially impact the health and safety of future occupants or interfere with the intended use of the property. Based on the findings, no such substances were identified that would warrant the application of these regulations.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX F

Endangered Species



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Montana Ecological Services Field Office
585 Shephard Way, Suite 1
Helena, MT 59601-6287
Phone: (406) 449-5225 Fax: (406) 449-5339

In Reply Refer To:

06/20/2025 21:02:22 UTC

Project code: 2025-0112307

Project Name: Saco - Wastewater Phase 2 Improvements

Please provide this document to the Federal agency or their designee with your loan/grant application.

Subject: Technical Assistance letter for the project named 'Saco - Wastewater Phase 2 Improvements' for specified threatened and endangered species that may occur in your proposed project location, pursuant to the IPaC determination key titled 'Clearance to Proceed with Federally-Insured Loan and Grant Project Requests'.

To whom it may concern:

On June 20, 2025, Kasia Bothman-Little used the IPaC determination key 'Clearance to Proceed with Federally-Insured Loan and Grant Project Requests'; dated May 28, 2025, in the U.S. Fish and Wildlife Service's online [IPaC tool](#) to evaluate potential impacts to listed species from a project named 'Saco - Wastewater Phase 2 Improvements' in Phillips County, Montana (shown below):

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@48.45423405,-107.34005697635436,14z>



The following description was provided for the project 'Saco - Wastewater Phase 2 Improvements':

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades.

The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St.

The lagoon upgrades will only involve minor improvements within the footprint of the current lagoon site, such as minor repairs to the lagoon berms, including minor earthwork operations, which will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion.

Based on your answers provided, the proposed project is unlikely to have any detrimental effects to federally-listed species or critical habitat. Therefore, per this guidance, Kasia Bothman-Little has determined that Saco - Wastewater Phase 2 Improvements will have No Effect on the species listed below.

This letter serves as documentation of your consideration of federally-listed species and designated critical habitat. Please see below additional considerations for non-federally listed species (i.e. bald eagles and migratory birds). No further coordination with the Service is necessary.

Please be advised that, if later modifications are made to the project that do not meet the criteria described above, if additional information involving potential effects to listed species becomes available, or if a new species is listed, reinitiation of consultation may be necessary.

- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Piping Plover *Charadrius melodus* Threatened
- Suckley's Cuckoo Bumble Bee *Bombus suckleyi* Proposed Endangered

ADDITIONAL CONSIDERATIONS FOR NON-FEDERALLY LISTED SPECIES

- **Bald and Golden Eagle Protection Act (BGEPA) and Bald Eagle Nest Issues.** The following resources are provided to project proponents and consulting agencies as additional information. Bald and golden eagles are not included in this section 7(a)(2)

consultation and this information does not constitute a determination of effects by the Service.

The Service developed the National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with Bald Eagles when and under what circumstances the protective provisions of the BGEPA may apply to their activities. The guidelines should be consulted prior to conducting new or intermittent activity near an eagle nest. This document may be downloaded from the following site: <https://www.fws.gov/migratorybirds/pdf/management/nationalbaldeaglenagementguidelines.pdf>

To determine if your proposed activity is likely to take or disturb Golden or Bald Eagles, please contact your local U.S. Fish and Wildlife Office for more information.

If the recommendations detailed in the National Bald Eagle Management Guidelines cannot be followed, you may apply for a permit to authorize removal or relocation of an eagle nest in certain instances. The application form is located at <http://www.fws.gov/forms/3-200-72.pdf>.

Within the southeast, if any of the above-referenced activities (rehabilitation, demolition, or rebuilding) are proposed to occur **within 660 feet** of an active or alternate bald eagle (*Haliaeetus leucocephalus*) nest during the nesting season (October 1 through May 15), we recommend the applicant or their designated agent coordinate with the agency responsible for managing wildlife in their state. For additional information, please visit the Service's regional web page: <https://www.fws.gov/program/eagle-management/eagle-incidentaldisturbance-and-nest-take-permits>.

- **Migratory Bird Issues.** If any native birds are using the structures for nesting then actions should be taken so as not to disturb the adults, nests, eggs, or chicks as this could lead to a potential violation of the Migratory Bird Treaty Act. If nests are present or any birds are using the structures regularly for roosting purposes, we recommend the applicant or their designated agent coordinate with the appropriate Service's Field Office and visit the Service's Migratory Bird Program website at <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidentaltake-migratory-birds> for recommendations on how impacts can be avoided and minimized.

Kasia Bothman-Little answered the determination key questions for this project as follows:

1. Does the project intersect Monroe County, FL?

Automatically answered

No

2. Does the project include federal grant funding, a federally-insured loan, or a federal loan transfer?

Yes, the project includes a federally-insured loan or federal grant funding.

3. Does the project involve a federal loan transfer, where the original lending or mortgage institutions for existing projects are no longer holding the loan and the property is being transferred via a federally-backed loan?

No

4. Is the entire site currently developed/hard-surfaced (i.e., the site consists entirely of existing roads, sidewalks, buildings, driveways, etc., and does not contain any undeveloped and/or vegetated areas)?

Yes, the entire site is already developed/hard-surfaced.

5. Will completion of this project require clearing or land disturbance of previously **undeveloped** habitat (e.g., native habitat, agricultural areas, pasture, etc.) **beyond the original footprint of the existing project**?

Note: Examples of land disturbance may include, but is not limited to: grading, vegetation removal, excavation, etc.

*No, this project will **not** require clearing of any undeveloped habitat.*

6. Is the federally-insured loan or federal grant funding being used for demolition, rehabilitation, renovation, and/or rebuilding of one or more existing facilities (e.g., residential, commercial and industrial sites, or utilities)?

Yes, the project includes Federal funding for work on existing facilities.

7. Does your project involve structures that are being used by any federally endangered or threatened species (e.g., roosting bonneted bats, denning indigo snakes, etc.) or are there known reports of species using the site?

*No, the site and/or structure(s) are **not** being used by any federally listed species.*

8. Will the project occur within the boundaries of a municipality?

Yes

9. Will the project impact wetlands, stream systems, or riparian vegetation or processes?

Note: This includes activities such as: riparian vegetation removal, ground disturbance within riparian areas, fill of wetlands or stream channels, wetland or stream channel excavation or modification, removal/installation of bridges, culverts, or fords, and other actions that would affect wetland hydrology, streams or rivers, or fish passage."

No

Attachments:

- Project questionnaire
- Determination key description: Clearance to Proceed with Federally-Insured Loan and Grant Project Requests
- U.S. Fish & Wildlife Service contact list

PROJECT INFORMATIONAL QUESTIONNAIRE

As part of completing the determination key, Kasia Bothman-Little provided the following information about their project:

1. How many square feet of facilities will be affected by this project?

450161

2. Which types of activities you will be conducting:

Infrastructure

Rehabilitation

3. Please describe the activity you will be conducting:

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades.

The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St.

The lagoon upgrades will only involve minor improvements within the footprint of the current lagoon site, such as minor repairs to the lagoon berms, including minor earthwork operations, which will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion.

4. Please describe the loan/grant program you are using

Community Development Block Grant - Public Facilities

5. Which Federal Agency is the lead agency providing the funding?

U.S. Department of Housing and Urban development (HUD)

6. Are there bald eagles within 660 feet of the site, or migratory birds or bats using structures on the site?

None of the above

7. Which types of structures this funding will address:

Sewer pipelines

Wastewater Lagoon

DETERMINATION KEY DESCRIPTION: CLEARANCE TO PROCEED WITH FEDERALLY-INSURED LOAN AND GRANT PROJECT REQUESTS

This key was last updated in IPaC on May 28, 2025. Keys are subject to periodic revision.

This determination key is for all Federally-insured loans, loan transfers, or grant project requests that may be completed without requiring additional clearing of undisturbed habitat beyond the original footprint of the existing project. Projects may include demolition, rehabilitation, renovations, and/or rebuilding of existing structures (*e.g.*, commercial buildings, multi-family housing, single-family housing), and various utility and infrastructure projects such as water and wastewater treatment facilities, sewer or power line repair, telecommunications upgrades, etc. For the purposes of this key, Federal loan transfers are those transfers where the original lending or mortgage institutions for existing projects are no longer holding the loans, and the properties are being transferred via federally-backed loans. ---- The U.S. Fish and Wildlife Service is the lead Federal agency charged with the protection and conservation of Federal Trust Resources, such as threatened and endangered species and migratory birds, in accordance with section 7 of the [Endangered Species Act of 1973](#), as amended (Act) (87 Stat. 884; 16 U.S.C. 1531 et seq.), the [Bald and Golden Eagle Protection Act](#), (16 U.S.C. 668-668d) (Eagle Act), and the [Migratory Bird Treaty Act](#) (40 Stat. 755; 16 U.S.C. 701 et seq.). Recently, many Federal agencies have activated programs that have resulted in an increased consumer demand to initiate projects through federally-backed loans and grants, all of which require those same Federal agencies to comply with Section 7 of the Act. Consequently, we have experienced an increase in the number of requests for review of these government-backed loan and grant projects. These include, but are not limited to:

1. U.S. Department of Housing and Urban Development's (HUD) Neighborhood Stabilization and Community Development Block Grant programs;
2. U.S. Department of Energy's (DOE) Energy Efficiency and Renewable Energy program;
3. U.S. Department of Agriculture's (USDA) Housing Assistance and Rural Development Loan and Grant Assistance programs;
4. U.S. Federal Aviation Administration (FAA) regulatory airport and runway modifications;
5. U.S. Federal Emergency Management Agency's (FEMA) Hazard Mitigation Assistance program;
6. U.S. Environmental Protection Agency's (EPA) Clean Water State Revolving Fund; and
7. U.S. Department of Commerce's (DOC) National Telecommunications and Information Administration Broadband Grant programs.

In order to fulfill the Act's statutory obligations in a timely and consistent manner, and to assist Federal agencies, State and local governments, and consultants in addressing Section 7 and National Environmental Policy Act (NEPA) environmental impact review requirements, we provide the following guidance and clearance relative to the criteria stated below for Federally-insured loan and grant project requests. This guidance is based on the signed letter: [U.S. Fish and Wildlife Service Clearance to Proceed with Federally-Insured Loan and Grant Project Requests](#)

in Florida, Alabama, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee, Yreka Fish and Wildlife Office, Kansas, Montana, Wyoming, Colorado, Southern Nevada Fish and Wildlife Office, Reno Fish and Wildlife Office, and Carlsbad Fish and Wildlife Office.

IPAC USER CONTACT INFORMATION

Agency: Helena city
Name: Kasia Bothman-Little
Address: 2501 Belt View Dr.
City: Helena
State: MT
Zip: 59602
Email: klittle@greatwesteng.com
Phone: 4064221290

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Department of Commerce



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Montana Ecological Services Field Office
585 Shephard Way, Suite 1
Helena, MT 59601-6287
Phone: (406) 449-5225 Fax: (406) 449-5339

In Reply Refer To:

06/20/2025 21:01:42 UTC

Project Code: 2025-0112307

Project Name: Saco - Wastewater Phase 2 Improvements

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Montana Ecological Services Field Office

585 Shephard Way, Suite 1

Helena, MT 59601-6287

(406) 449-5225

PROJECT SUMMARY

Project Code: 2025-0112307
Project Name: Saco - Wastewater Phase 2 Improvements
Project Type: Wastewater Pipeline - Maintenance / Modification - Below Ground
Project Description: The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades.

The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St.

The lagoon upgrades will only involve minor improvements within the footprint of the current lagoon site, such as minor repairs to the lagoon berms, including minor earthwork operations, which will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@48.45423405,-107.34005697635436,14z>



Counties: Phillips County, Montana

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885	Proposed Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Helena city
Name: Kasia Bothman-Little
Address: 2501 Belt View Dr.
City: Helena
State: MT
Zip: 59602
Email: klittle@greatwesteng.com
Phone: 4064221290

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Department of Commerce

Endangered Species Act (CEST and EA)

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402
References		
https://www.hudexchange.info/environmental-review/endangered-species		

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.

Explain your determination:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes, the activities involved in the project have the potential to affect species and/or habitats. → *Continue to Question 2.*

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#) or you may contact your [local FWS](#) and/or [NMFS](#) offices directly.

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation*

may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

4. Informal Consultation is required

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological evaluation or equivalent document*
- (2) Concurrence(s) from FWS and/or NMFS*
- (3) Any other documentation of informal consultation*

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding. → Continue to Question 5.

5. Formal consultation is required

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

→ Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that will be implemented to mitigate for the impact or effect, including the timeline for implementation.

Mitigation as follows will be implemented:

No mitigation is necessary.

Explain why mitigation will not be made here:

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

According to the Information for Planning and Consultation (IPaC) system, which provides critical data for assessing environmental impacts, a comprehensive review under the Endangered Species Act has been conducted. The findings indicate that the project in question will not adversely affect any of the species identified by the determination key associated with this assessment. This conclusion is supported by a thorough evaluation of the potential interactions between the project activities and the habitats of these species, ensuring compliance with conservation regulations and safeguarding biodiversity.

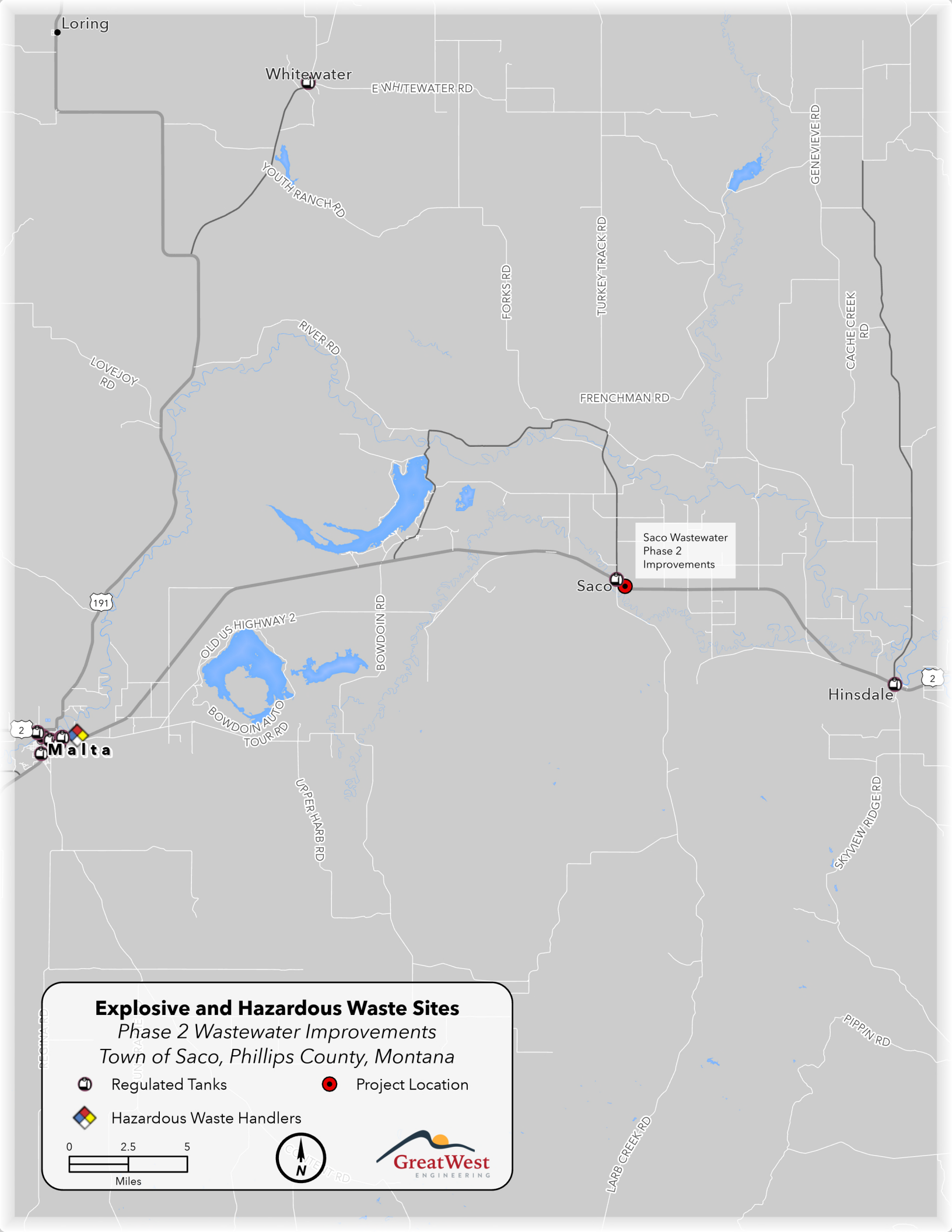
Are formal compliance steps or mitigation required?

Yes

No

APPENDIX G

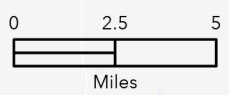
Explosive and Flammable Hazards



Explosive and Hazardous Waste Sites

Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana

-  Regulated Tanks
-  Project Location
-  Hazardous Waste Handlers



Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
Reference		
https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities		

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

→ Go directly to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes

→ Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “no.” For any other type of aboveground storage container within the search area that holds one of the

flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “yes.”

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes

→ Continue to Question 4.

4. Visit HUD’s website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and
- Electronic assessment tool calculation of the required separation distance.

Based on the analysis, is the proposed HUD-assisted project site located at or beyond the required separation distance from all covered tanks?

Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

No

→ Go directly to Question 6.

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.
Continue to Question 6.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

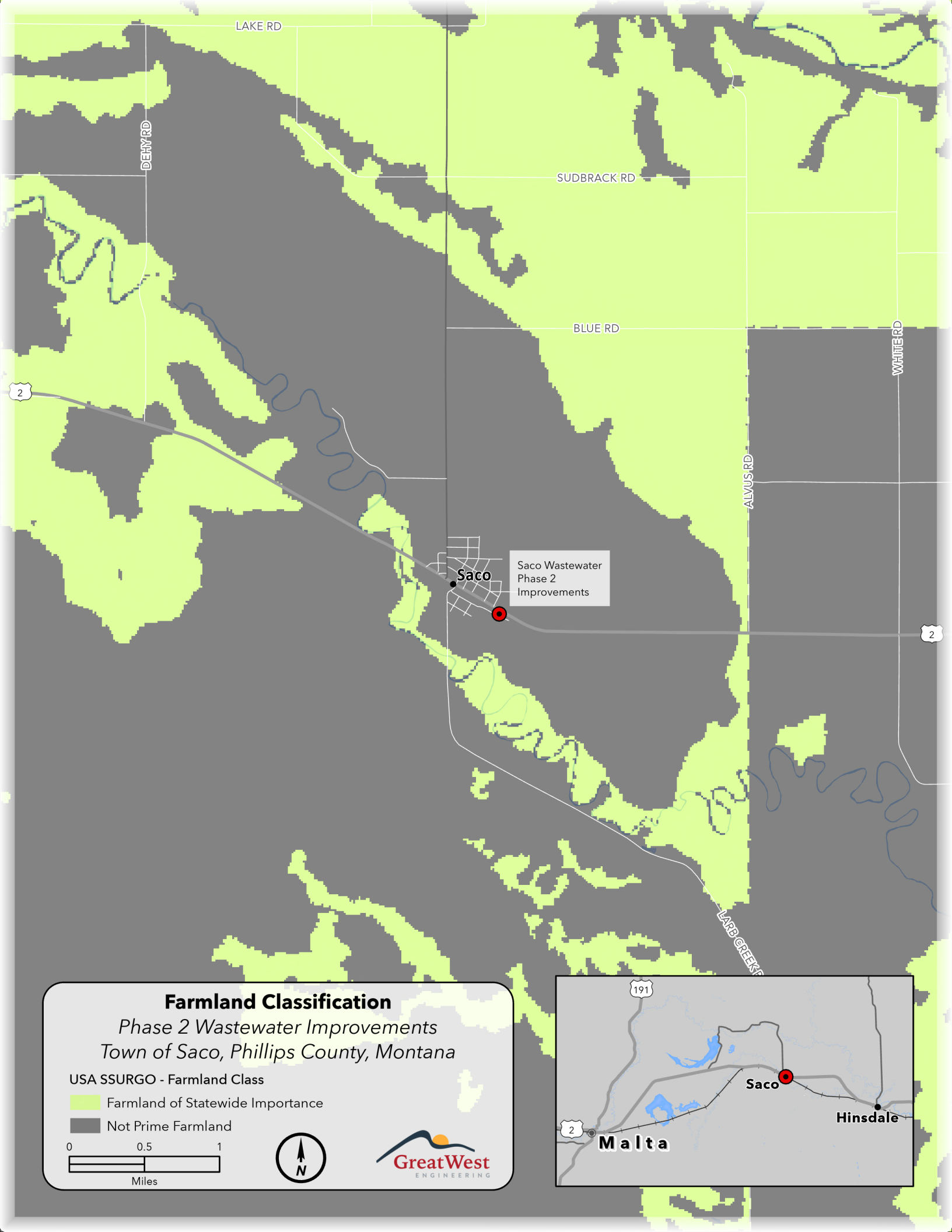
The reconstruction of water mains and lagoon improvements will not constitute the development of a hazardous facility involving the storage, handling, or processing of flammable or combustible chemicals such as bulk fuel storage facilities and refineries. Additionally, these activities do not include development, construction, rehabilitation that will increase residential densities, or conversion.

Are formal compliance steps or mitigation required?

- Yes
 No

APPENDIX H

Farmlands Protection



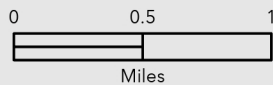
Farmland Classification

Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana

USA SSURGO - Farmland Class

 Farmland of Statewide Importance

 Not Prime Farmland



Soil Map—Phillips County Area, Montana
(Saco Lagoon Site)



Soil Map may not be valid at this scale.

Map Scale: 1:1,690 if printed on A landscape (11" x 8.5") sheet.



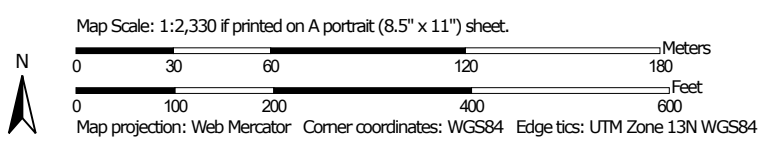
Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 13N WGS84



Soil Map—Phillips County Area, Montana
(Phase 2 Collection Improvements)




Soil Map may not be valid at this scale.



Soil Map—Phillips County Area, Montana
(Phase 2 Collection Improvements)

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Phillips County Area, Montana
Survey Area Data: Version 20, Aug 22, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 13, 2021—Aug 14, 2021


The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
93A	Bowdoin clay, 0 to 2 percent slopes	1.8	100.0%
Totals for Area of Interest		1.8	100.0%

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Phillips County Area, Montana
Survey Area Data: Version 20, Aug 22, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 13, 2021—Aug 14, 2021

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
93A	Bowdoin clay, 0 to 2 percent slopes	2.6	36.6%
W	Water	4.5	63.4%
Totals for Area of Interest		7.1	100.0%

Farmlands Protection (CEST and EA)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658
Reference		
https://www.hudexchange.info/environmental-review/farmlands-protection		

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

- Yes
 No

Explain how you determined that agricultural land would not be converted:

Based on the Lagoon property information from Cadastral, this property is not considered for the use of agriculture.
The collection main improvements are in an already Urban Developed property.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting your determination.*

2. Does your project meet one of the following exemptions?

- Project on land already in or committed to urban development or used for water storage ([7 CFR 658.2\(a\)](#)). To check whether the project location is located in an urbanized area, use the following US Census Bureau application: [TIGERweb](#)
 - Construction limited to on-farm structures needed for farm operations
 - Construction is limited to new minor secondary (accessory) structures such as a garage or storage shed
- Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination*
- No → *Continue to Question 3.*

3. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes → *Continue to Question 4.*

4. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form **AD-1006**, “Farmland Conversion Impact Rating” http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf and contact the state soil scientist before sending it to the local NRCS District Conservationist.
(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, “Farmland Conversion Impact Rating for Corridor Type Projects: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf.)
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Document your conclusion:

Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Project will proceed without mitigation.

Explain why mitigation will not be made here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the NRCS web soil survey, the primary soils is Bowdoin clay, which is not considered a “farmland of statewide importance”. See maps in Appendix G.

Are formal compliance steps or mitigation required?

- Yes
- No

APPENDIX I

Historic Preservation

From: [Murdo, Damon](#)
To: [Kinsee Dodge](#)
Subject: SACO WASTEWATER SYSTEM PER
Date: Thursday, January 20, 2022 4:14:37 PM
Attachments: [Reports.pdf](#)
[Sites.pdf](#)
[2022011908.pdf](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Big Sky. Big Land. Big History.
Montana
Historical Society

January 20, 2022

Kinsee Dodge
Great West Engineering
2501 Belt View Drive
Helena MT 59604

RE: SACO WASTEWATER SYSTEM PER. SHPO Project #: 2022011908

Dear Kinsee:

I have conducted a cultural resource file search for the above-cited project located in Sections 7, 8, 17, T31N R34E. According to our records there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the area. I've attached a list of these sites and reports. If you would like any further information regarding these sites or reports, you may contact me at the number listed below.

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place.

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

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office

File: DEQ/AIR&WATER WASTE MNG/2022



STATE HISTORIC PRESERVATION OFFICE

Cultural Resource Information Systems

CRIS Township, Range, Section Report

Report Date:1/20/2022

Site #	Twp	Rng	Sec	Qs	Site Type 1	Site Type 2	Time Period	Owner	NR Status
24PH3913	31N	34E	17	NW	Historic Vehicular/Foot Bridge		Historic More Than One Decade	Other	Eligible
24PH3008	31N	34E	17	NE	Historic Railroad		Historic Period	Private	Eligible
24PH3008	31N	34E	7	Comb	Historic Railroad		Historic Period	Private	Eligible
24PH3008	31N	34E	8	Comb	Historic Railroad		Historic Period	Private	Eligible
24PH3103	31N	34E	7	comb	Historic Irrigation System		Historic More Than One Decade	BOR	Eligible
24PH3103	31N	34E	17	SW	Historic Irrigation System		Historic More Than One Decade	BOR	Eligible
24PH3169	31N	34E	8		Historic Commercial Development		Historic More Than One Decade	Private	Undetermined*
24PH3170	31N	34E	8		Historic Gas Station		Historic More Than One Decade	Private	Undetermined*
24PH3171	31N	34E	8		Historic Gas Station		Historic More Than One Decade	Private	NR Listed
24PH3172	31N	34E	8		Historic Gas Station		Historic More Than One Decade	Private	Undetermined*
24PH3173	31N	34E	8		Historic Commercial Development		Historic More Than One Decade	Private	Undetermined*
24PH3174	31N	34E	8		Historic Commercial Development		Historic More Than One Decade	Private	Undetermined*
24PH3464	31N	34E	7	comb	Historic Road/Trail		Historic More Than One Decade	Combination	Eligible
24PH3464	31N	34E	7		Historic Road/Trail		Historic More Than One Decade	Combination	Eligible
24PH3464	31N	34E	8		Historic Road/Trail		Historic More Than One Decade	Combination	Eligible
24PH3501	31N	34E	8	SW	Historic Residence		Historic More Than One Decade	Private	Eligible
24PH3502	31N	34E	8	SW	Historic Residence		Historic More Than One Decade	Private	Eligible
24PH3503	31N	34E	8	SW	Historic Communication		1950-1959	Private	Eligible
24PH3504	31N	34E	8	SW	Historic Commercial Development		1950-1959	Private	Eligible
24PH3505	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Ineligible
24PH3506	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Undetermined*
24PH3507	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24PH3508	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24PH3509	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24PH3510	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24PH3511	31N	34E	8	SW	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24PH3530	31N	34E	8	SW	Historic District		Historic Period	No Data	Eligible
24PH4120	31N	34E	17	SW	Historic Homestead/Farmstead		Historic More Than One Decade	Private	Ineligible BLM PA
24PH4153	31N	34E	7		Historic Trash Dump		Historic More Than One Decade	Private	Ineligible BLM PA
24PH3415	31N	34E	8	SW	Historic Commercial Development	Historic Architecture	Historic More Than One Decade	Private	NR Listed



STATE HISTORIC PRESERVATION OFFICE Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 1/20/2022

Township: 31 N Range: 34 E Section: 7

DAU BARRY J. AND PATRICK RENNIE

4/30/1993 SELECT SEGMENTS OF A PROPOSED FIBER OPTIC TRANSMISSION LINE FROM NORTH OF GLASGOW TO THE SLEEPING BUFFALO RESORT, NORTHEASTERN MONTANA

CRABS Document Number: PH 2 14975 Agency Document Number: 93-MT-064-02/MR-93-25

Township: 31 N Range: 34 E Section: 8

DAU BARRY J. AND PATRICK RENNIE

4/30/1993 SELECT SEGMENTS OF A PROPOSED FIBER OPTIC TRANSMISSION LINE FROM NORTH OF GLASGOW TO THE SLEEPING BUFFALO RESORT, NORTHEASTERN MONTANA

CRABS Document Number: PH 2 14975 Agency Document Number: 93-MT-064-02/MR-93-25

Township: 31 N Range: 34 E Section: 8

WINGATE ROY

1/1/1991 THE HISTORIC CULTURAL RESOURCES OF THE MILK RIVER PROJECT

CRABS Document Number: GL 6 22630 Agency Document Number:

Township: 31 N Range: 34 E Section: 7

HUFSTETLER MARK A.

1/24/2000 SACO HIGHWAY RECONSTRUCTION PROJECT, PHILLIPS COUNTY, MONTANA: A CULTURAL RESOURCE INVENTORY

CRABS Document Number: PH 4 22765 Agency Document Number: F 1-8(16)499F

Township: 31 N Range: 34 E Section: 8

HUFSTETLER MARK A.

1/24/2000 SACO HIGHWAY RECONSTRUCTION PROJECT, PHILLIPS COUNTY, MONTANA: A CULTURAL RESOURCE INVENTORY

CRABS Document Number: PH 4 22765 Agency Document Number: F 1-8(16)499F

Township: 31 N Range: 34 E Section: 8

WOOD GARVEY C.

9/17/2003 FIDELITY 1204 FEDERAL CONNECTING PIPELINE IN PHILLIPS COUNTY MONTANA

CRABS Document Number: PH 2 26610 Agency Document Number: 03-MT-065-036

Township: 31 N Range: 34 E Section: 17

WOOD GARVEY C.

6/26/2005 CULTURAL RESOURCES INVENTORY OF THE FEDERAL 1301 NATURAL GAS WELL & CONNECTING PIPELINE IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 28020 Agency Document Number: 05-MT-065-054

Township: 31 N Range: 34 E Section: 7

BLUEMLE WILLIAM J

1/4/2007 FIDELITY'S FEDERAL 1380: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 29173 Agency Document Number: MT-065-003-I

Township: 31 N Range: 34 E Section: 17

BLUEMLE WILLIAM J

1/4/2007 FIDELITY'S FEDERAL 1369: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 29174 Agency Document Number: 07-MT-065-003-T

Township: 31 N Range: 34 E Section: 7

THOMAS JENNIFER

10/5/2007 MDT-CULVERT: A CULTURAL RESOURCE SURVEY OF 49 CULVERTS THROUGHOUT EASTERN MONTANA

CRABS Document Number: ZZ 4 29695 Agency Document Number:

Township: 31 N Range: 34 E Section: 8

THOMAS JENNIFER

10/5/2007 MDT-CULVERT: A CULTURAL RESOURCE SURVEY OF 49 CULVERTS THROUGHOUT EASTERN MONTANA

CRABS Document Number: ZZ 4 29695 Agency Document Number:

Township: 31 N Range: 34 E Section: 7

BARTH AARON L.

8/1/2007 FIDELITY'S FEDERAL 1414: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA



STATE HISTORIC PRESERVATION OFFICE Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 1/20/2022

CRABS Document Number: PH 2 30022 Agency Document Number: 08-MT-065-006

Township: 31 N Range: 34 E Section: 17

BLUEMLE WILLIAM & AARON BARTH

12/1/2007 FIDELITY'S FEDERAL 1415: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 30028 Agency Document Number: 08-MT-065-020

Township: 31 N Range: 34 E Section: 7

BLUEMLE WILLIAM

9/1/2008 FIDELITY'S FEDERAL 1440: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 30900 Agency Document Number: 08-MT-065-068

Township: 31 N Range: 34 E Section: 7

TRAVIS LAURI

10/1/2000 FIDELITY'S FEDERAL 1426: A CULTURAL RESOURCE INVENTORY IN PHILLIPS COUNTY, MONTANA

CRABS Document Number: PH 2 30901 Agency Document Number: 08-MT-065-066

Township: 31 N Range: 34 E Section: 17

AXLINE JON

6/24/2016 BEAVER CREEK - SOUTH OF SACO

CRABS Document Number: PH 4 38346 Agency Document Number: BR 9036(31)

Township: 31 N Range: 34 E Section: 7

EIGENBERGER ERIKA

6/30/2017 BNSF SACO WEST EMBANKMENT STABILIZATION PROJECT

CRABS Document Number: PH 6 39806 Agency Document Number: NWO-2017-00276-MTB

Historic Preservation (CEST and EA)

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties"
References		
https://www.hudexchange.info/environmental-review/historic-preservation		

Threshold

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

→ Continue to the Worksheet Summary.

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

→ Continue to the Worksheet Summary.

- Yes, because the project includes activities with potential to cause effects (direct or indirect). → Continue to Step 1.

The Section 106 Process

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if you should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

Select all consulting parties below (check all that apply):

- State Historic Preservation Officer (SHPO)
- Advisory Council on Historic Preservation
- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native
- Hawaiian Organizations (NHOs)

List all tribes that were consulted here and their status of consultation:

Apache Tibe of Oklahoma
Crow Tribe of Montana
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
Little Shell Tribe

- Other Consulting Parties

List all consulting parties that were consulted here and their status of consultation:

Describe the process of selecting consulting parties and initiating consultation here:

Provide all correspondence, notices, and notes (including comments and objections received) and continue to Step 2.

Step 2 - Identify and Evaluate Historic Properties

Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

Township 31 North, Range 34 East, Sections: 7, 8, & 17.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register.

Refer to HUD’s website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

See “State Historic Preservation Office Cultural Resource Information Systems CRIS Township, Range, Section Report” in appendix.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

- Yes → *Provide survey(s) and report(s) and continue to Step 3.*

Additional notes:

See Section Results in Appendix for a list of results.

- No → *Continue to Step 3.*

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

- No Historic Properties Affected

Document reason for finding:

- No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*
- Historic properties present, but project will have no effect upon them. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.4\(d\)\(1\)](#)) and consult further to try to resolve objection(s).

No Adverse Effect

Document reason for finding:

Does the No Adverse Effect finding contain conditions?

Yes

Check all that apply: (check all that apply)

- Avoidance
- Modification of project
- Other

Describe conditions here:

→ *Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

No → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.5\(c\)\(2\)](#)) and consult further to try to resolve objection(s).

Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)]

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in [36 CFR 800.11\(e\)](#). The Council has 15 days to decide whether to enter the consultation (Not required for projects covered by a Programmatic Agreement).

→ *Continue to Step 4.*

Step 4 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and [36 CFR 800.6 and 800.7](#).

Were the Adverse Effects resolved?

Yes

Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:

For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.*

No

The project must be cancelled unless the “Head of Agency” approves it. Either provide approval from the “Head of Agency” or cancel the project at this location.

Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and “Head of the Agency”:

Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Provide correspondence, comments, documentation of decision, and “Head of Agency” approval. Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Montana Historical Society was contacted regarding possible historic properties located at the project site. Please see the response letter in Appendix H, along with a list of the Historic properties in the area that will not be affected by the project.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX J

Noise Abatement and Control

Noise (EA Level Reviews)

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
References		
https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control		

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ *Continue to Question 2.*

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

- A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

- None of the above

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

Noise generators were found within the threshold distances.

→ *Continue to Question 3.*

3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here:

If project is rehabilitation:

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

Is the project in a largely undeveloped area¹?

No

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

Yes

→ Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.

Unacceptable: (Above 75 decibels)

Indicate noise level here:

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:

Convert to an EIS

→ Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 4.

Provide waiver

→ Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.

Continue to Question 4.

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

Mitigation as follows will be implemented:

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures. Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here:

→ Continue to the Worksheet Summary.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The determination regarding the Saco wastewater improvements project indicates that the project involves the replacement of water collection mains and some minor upgrades to the lagoon system (Please see the Saco Wastewater 2022 PER, and 2024 Design Report). Importantly, it does not include any new construction or rehabilitation of residential properties. As a result, the project is not subject to Title 24 CFR 51 Subpart B, which pertains to certain environmental considerations related to housing. This implies that the project is focused solely on infrastructure improvements without impacting residential land use or development.

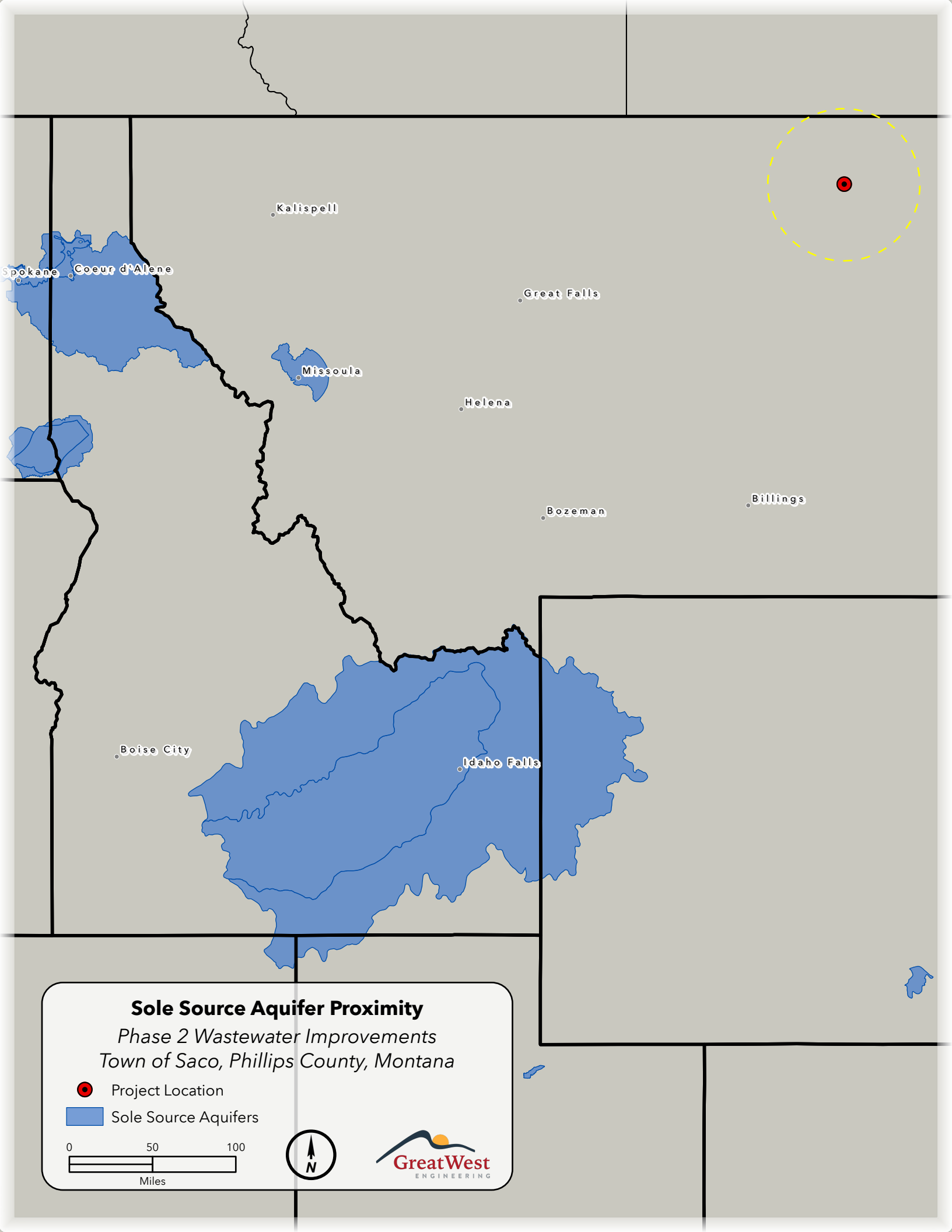
Are formal compliance steps or mitigation required?

Yes

No



APPENDIX K

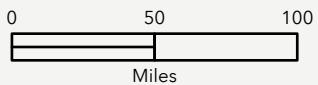
Sole Source Aquifers

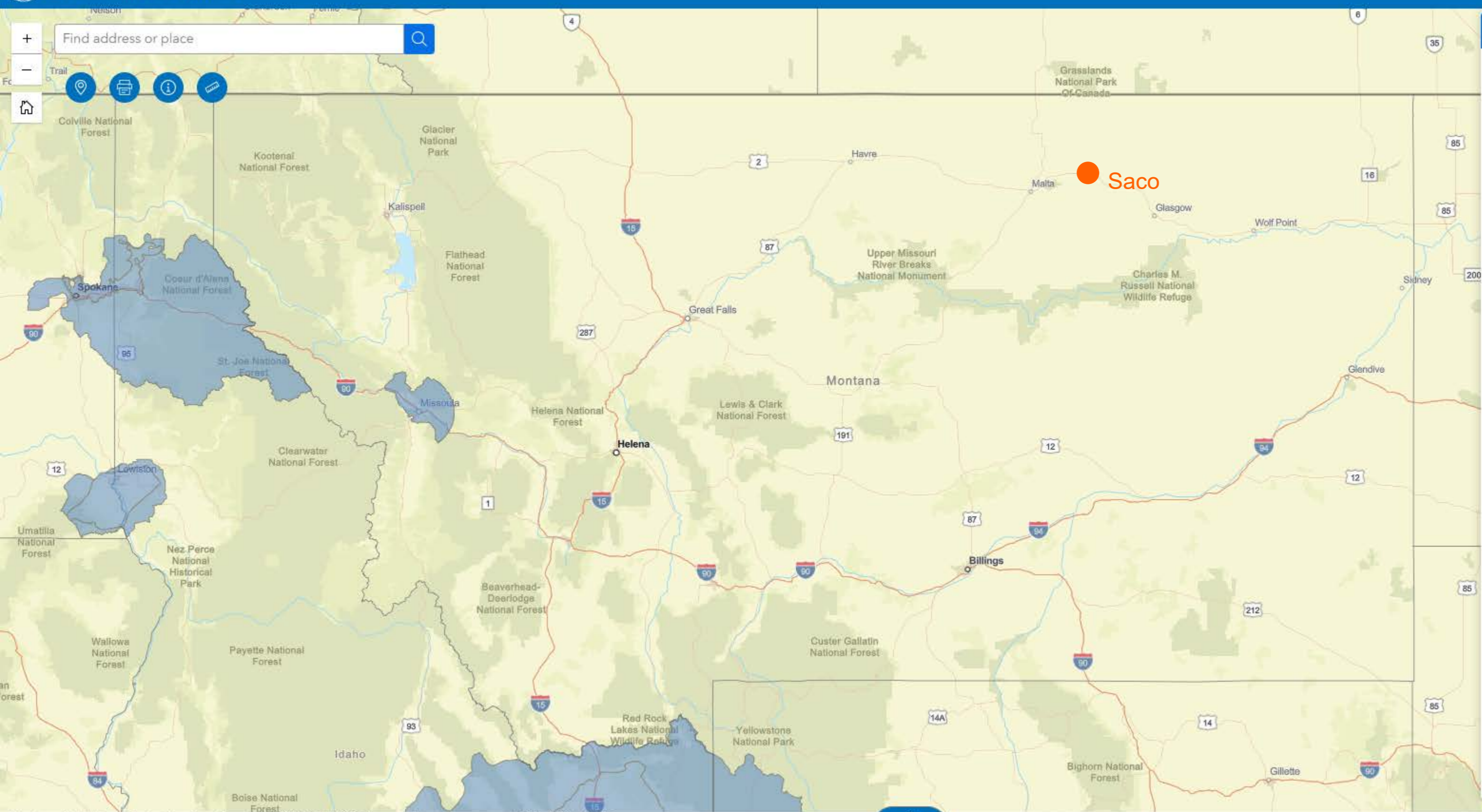


Sole Source Aquifer Proximity

*Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana*

-  Project Location
-  Sole Source Aquifers





Legend

Sole_Source_Aquifers



Sole Source Aquifers (CEST and EA)

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149
Reference		
https://www.hudexchange.info/environmental-review/sole-source-aquifers		

1. Does your project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

No → *Continue to Question 2.*

2. Is the project located on a sole source aquifer (SSA)¹?

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area.*

Yes → *Continue to Question 3.*

3. Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?

Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

Yes → *Provide the MOU or agreement as part of your supporting documentation. Continue to Question 4.*

No → *Continue to Question 5.*

4. Does your MOU or working agreement exclude your project from further review?

Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

¹ A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*

Yes → *Work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

6. In order to continue with the project, any threat must be mitigated, and all mitigation must be approved by the EPA. Explain in detail the proposed measures that can be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

There are no Sole Source Aquifers in the project locations.

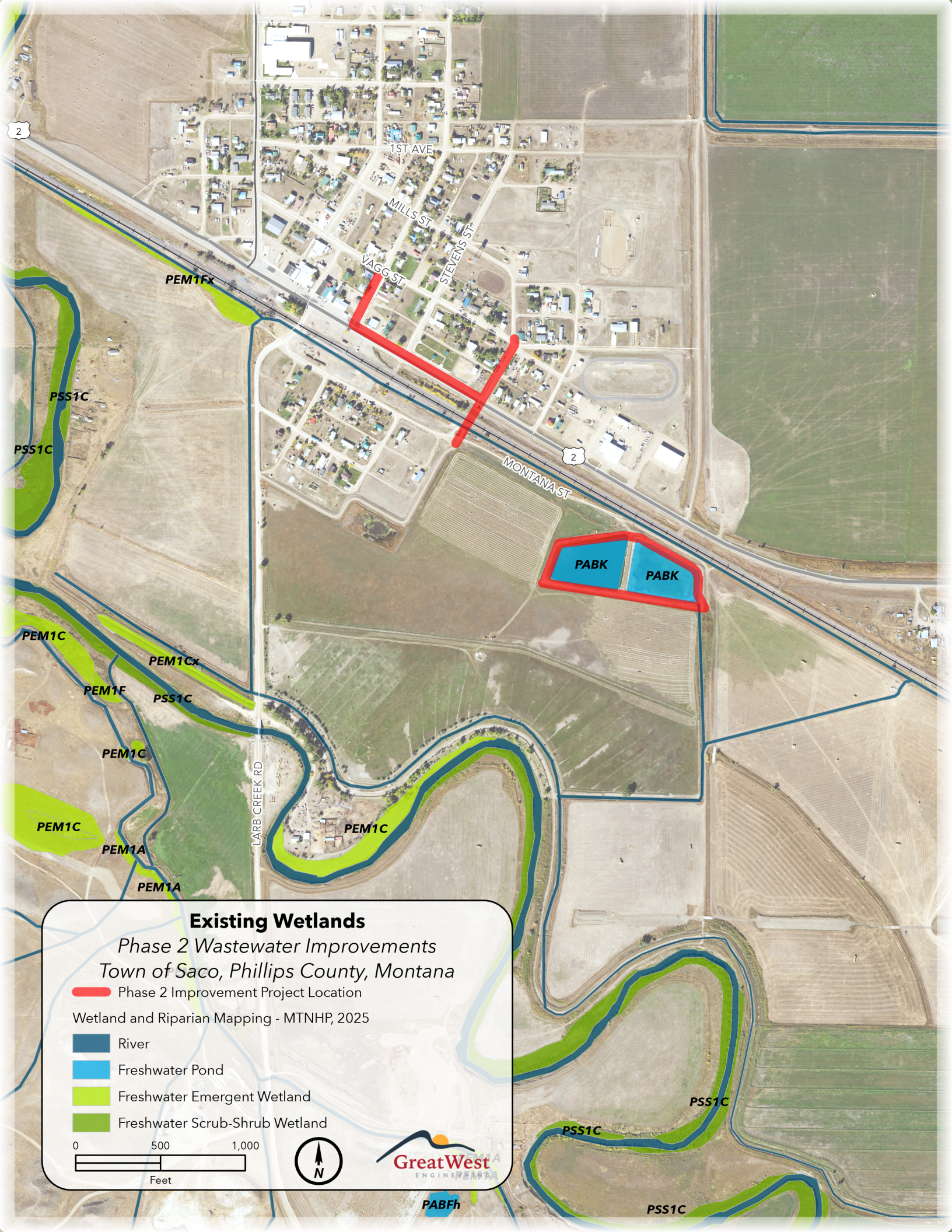
Are formal compliance steps or mitigation required?

Yes

No

APPENDIX L

Wetlands



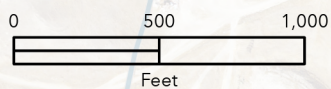
Existing Wetlands

Phase 2 Wastewater Improvements
Town of Saco, Phillips County, Montana

Phase 2 Improvement Project Location

Wetland and Riparian Mapping - MTNHP, 2025

- River
- Freshwater Pond
- Freshwater Emergent Wetland
- Freshwater Scrub-Shrub Wetland



PABFh

PSS1C

PSS1C

PSS1C

PEM1C

PEM1A

PEM1C

PEM1F

PEM1Cx

PSS1C

PEM1C

PSS1C

PSS1C

PEM1FX

1ST AVE

MILLS ST

VAGG ST

STEVENS ST

MONTANA ST

PABK

PABK

2

2


LARB CREEK RD



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

March 27, 2026

Wetlands

- | | | |
|--|---|--|
|  Estuarine and Marine Deepwater |  Freshwater Emergent Wetland |  Lake |
|  Estuarine and Marine Wetland |  Freshwater Forested/Shrub Wetland |  Other |
| |  Freshwater Pond |  Riverine |




This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Saco, MT



March 27, 2026

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Wetlands (CEST and EA)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.
References		
https://www.hudexchange.info/environmental-review/wetlands-protection		

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact an on- or off-site wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

→ You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.

Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.

Continue to Question 3.

- 3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Which of the following mitigation actions have been or will be taken? Select all that apply:

- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- Native plant species
- Bioswales
- Evapotranspiration
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements
- Compensatory mitigation

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The US Fish and Wildlife Service Wetlands Mapper (www.fws.gov/wetlands/data/Mapper.html) was used to determine the presence of wetlands within the planning area. See Appendix K for a figure presenting the aerial extent of mapped wetlands in the area. Some areas classified as freshwater emergent wetlands appear to intermittently follow Beaver Creek and along highway roadside ditches. As the project takes place in the footprint of the original areas, a wetland will not be impacted in terms of E.O. 1190's definition of new construction.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX M

Wild and Scenic Rivers

Find a River

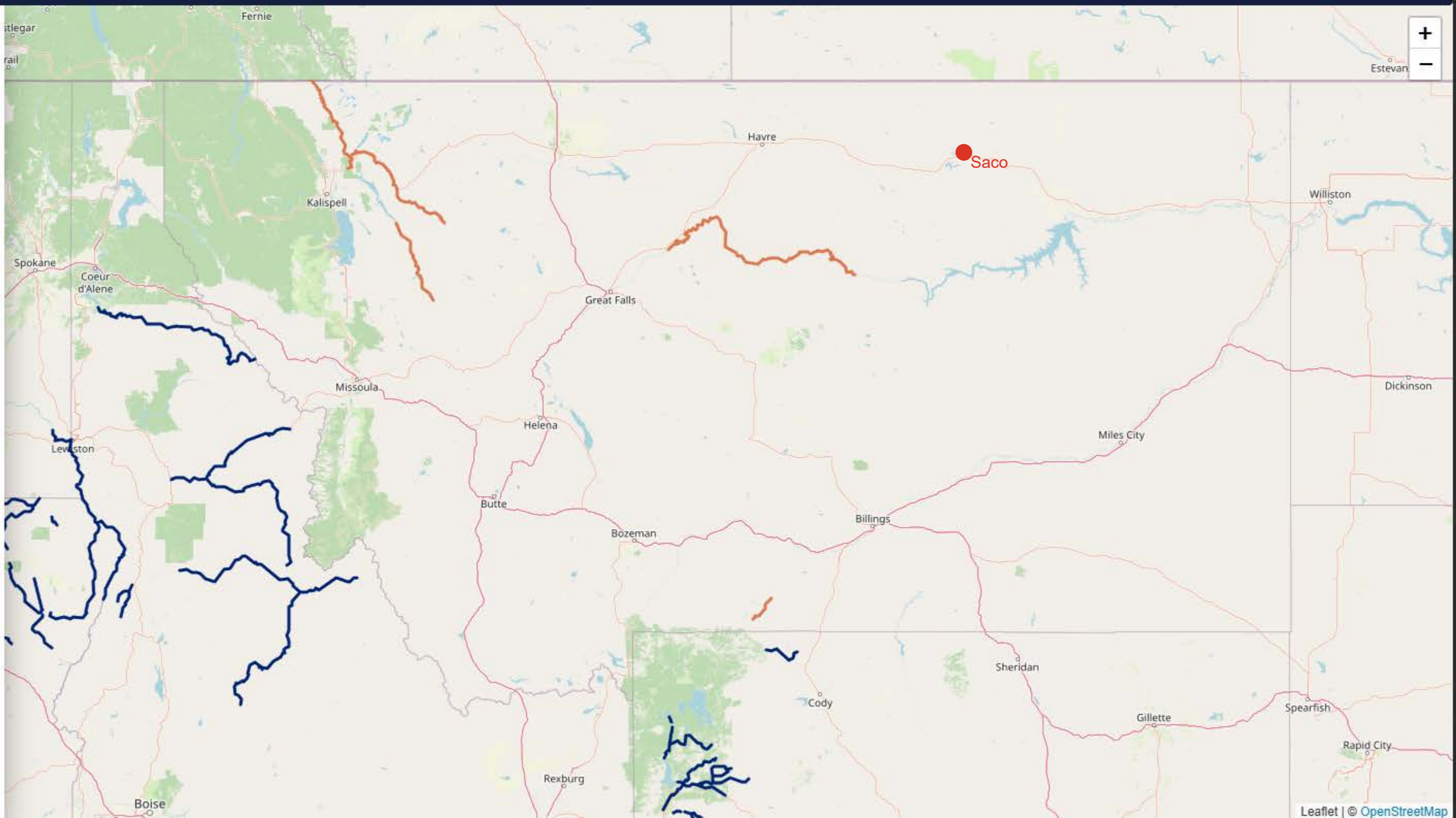
State

Classification

Outstandingly Remarkable Values

Results

- East Rosebud Creek
- Flathead River
- Missouri River



Wild and Scenic Rivers (CEST and EA)

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297
References		
https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers		

1. Is your project within proximity of a NWSRS river as defined below?

Wild & Scenic Rivers: These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

→ Continue to Question 2.

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

According to the detailed information available on rivers.gov/montana, the designated project locations in Saco are situated at a considerable distance from any National Wild and Scenic River. This indicates that these sites do not fall within the protected areas recognized for their outstanding natural beauty and recreational value, allowing for the potential development of the project without immediate environmental concerns related to these designated rivers.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX N

Agency Letters and Correspondence

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Durell Cooper
Chairman, Apache Tribe of Oklahoma
511 East Colorado
Anadarko, OK 73005
durell.cooper@apachetribe.org
Via USPS and Email

**Re: *Town of Saco, Montana – Phase 2 Wastewater Improvements Project
HUD Program***

Dear Chairman Cooper:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Durell Cooper
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

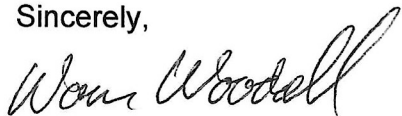
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries

0 500 1,000 Feet

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3512 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

Dyan Youpee
Tribal Historical Preservation Officer
Fort Peck Assiniboine and Sioux Tribes
P.O. Box 1027
Poplar, MT 59255
d.youpee@fortpecktribes.net
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Ms. Youpee:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

Ms. Dyan Youpee
Page | 2
March 11, 2026

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

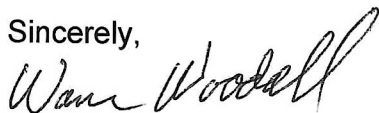
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

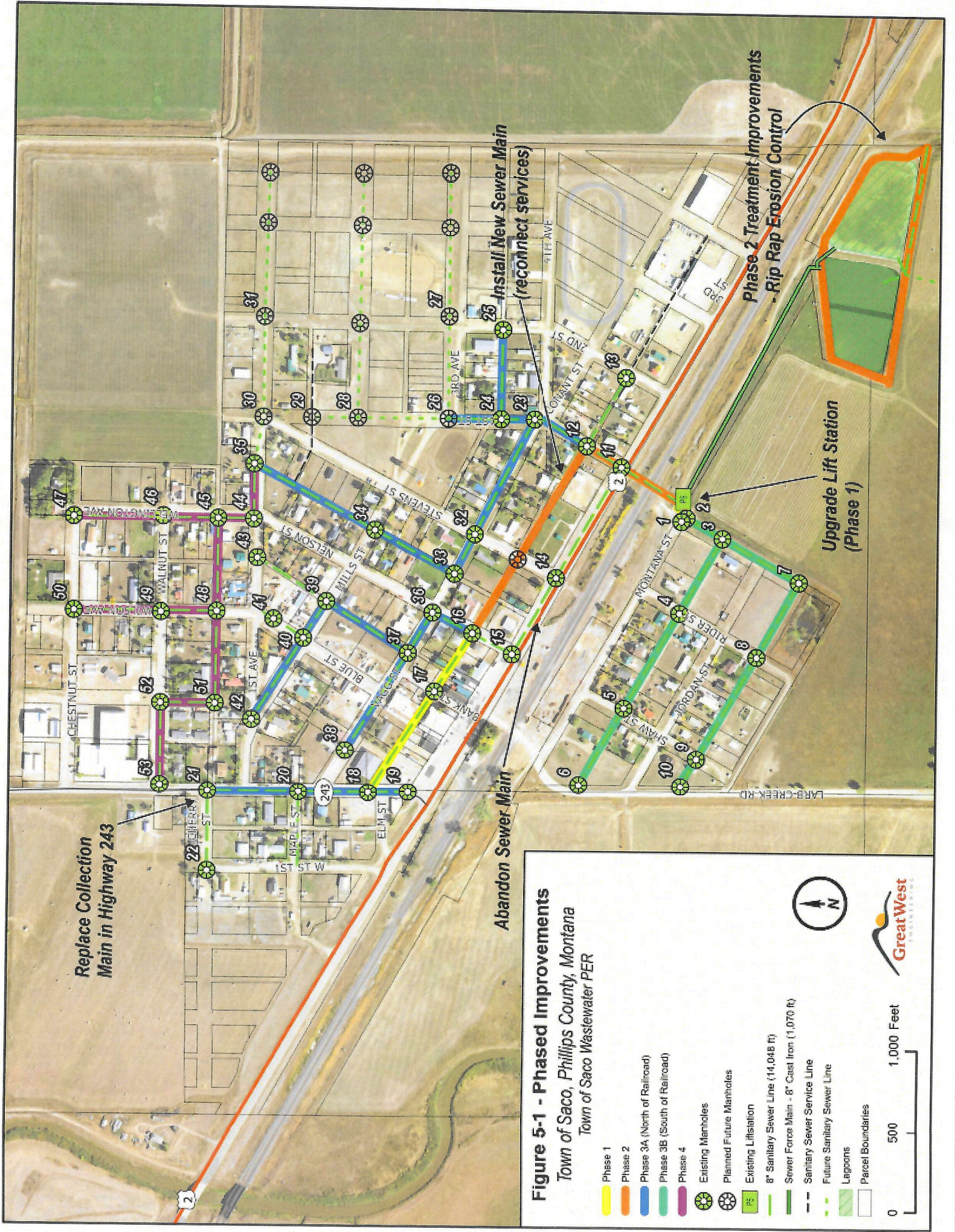
Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements
- Rip Rap Erosion Control

Upgrade Lift Station
(Phase 1)

Figure 5-1 - Phased Improvements
Town of Saco, Phillips County, Montana
Town of Saco Wastewater PER

- Phase 1
- Phase 2
- Phase 3A (North of Railroad)
- Phase 3B (South of Railroad)
- Phase 4
- Existing Manholes
- Planned Future Manholes
- Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- Future Sanitary Sewer Line
- Leagoons
- Parcel Boundaries

0 500 1,000 Feet

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3812 • Fax (406) 527-9232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Frank Whiteclay
Chairman, Crow Tribe
P.O. Box 159
Crow Agency, MT 59022
frank.whiteclay@crow-nsn.gov
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Chairman Whiteclay:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Frank Whiteclay
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

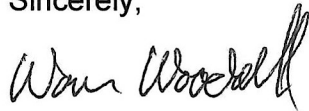
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

http://www.onecpd.info/environmental-review/historic-preservation/.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

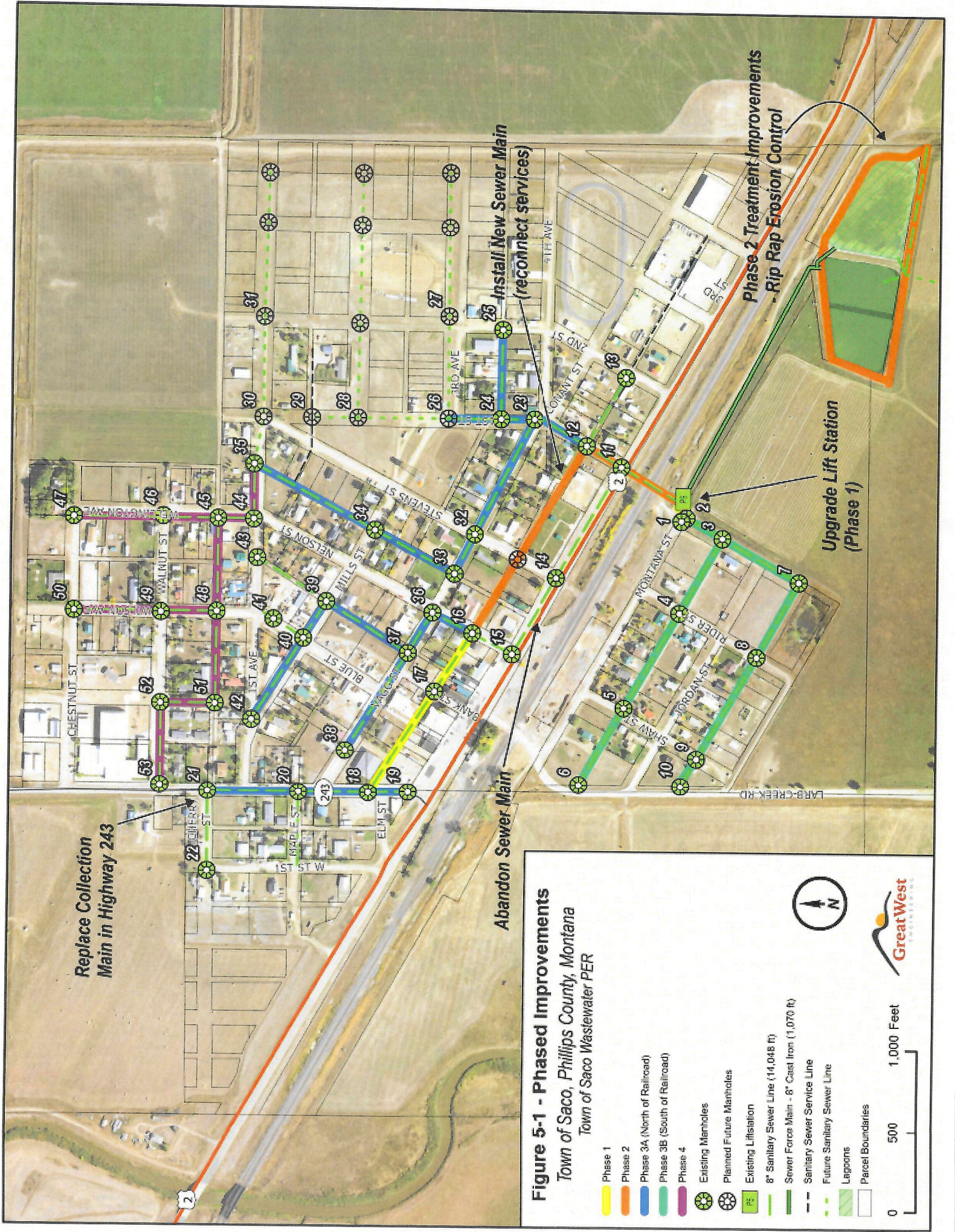
Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries

0 500 1,000 Feet

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Gene Small
President, Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, MT 59043
gene.small@cheyennation.com
Via USPS and Email

**Re: *Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program***

Dear President Small:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Gene Small
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

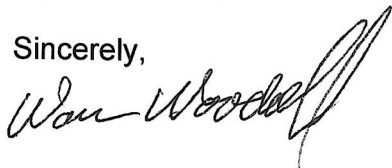
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

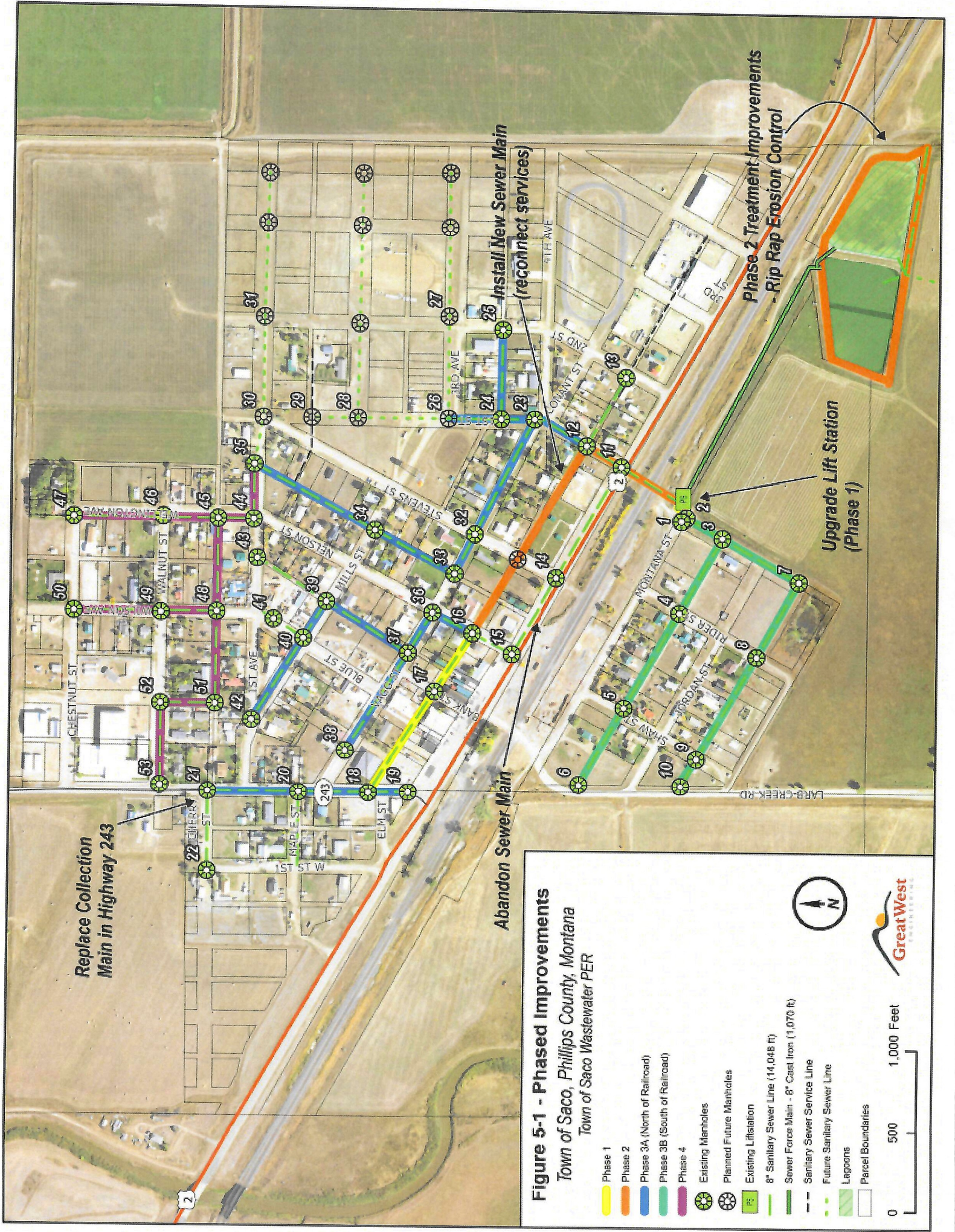
Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

Phase 1
 Phase 2
 Phase 3A (North of Railroad)
 Phase 3B (South of Railroad)
 Phase 4
 Existing Manholes
 Planned Future Manholes
 Existing Liftstation
 8" Sanitary Sewer Line (14,048 ft)
 Sewer Force Main - 8" Cast Iron (1,070 ft)
 Sanitary Sewer Service Line
 Future Sanitary Sewer Line
 Lagoons
 Parcel Boundaries

0 500 1,000 Feet

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Gerald Gray
Chairman, Little Shell Tribe
511 Central Avenue West
Great Falls, MT 59404
gerald.gray@littleshelltribe.com
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Chairman Gray:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Gerald Gray
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

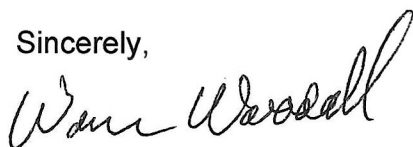
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

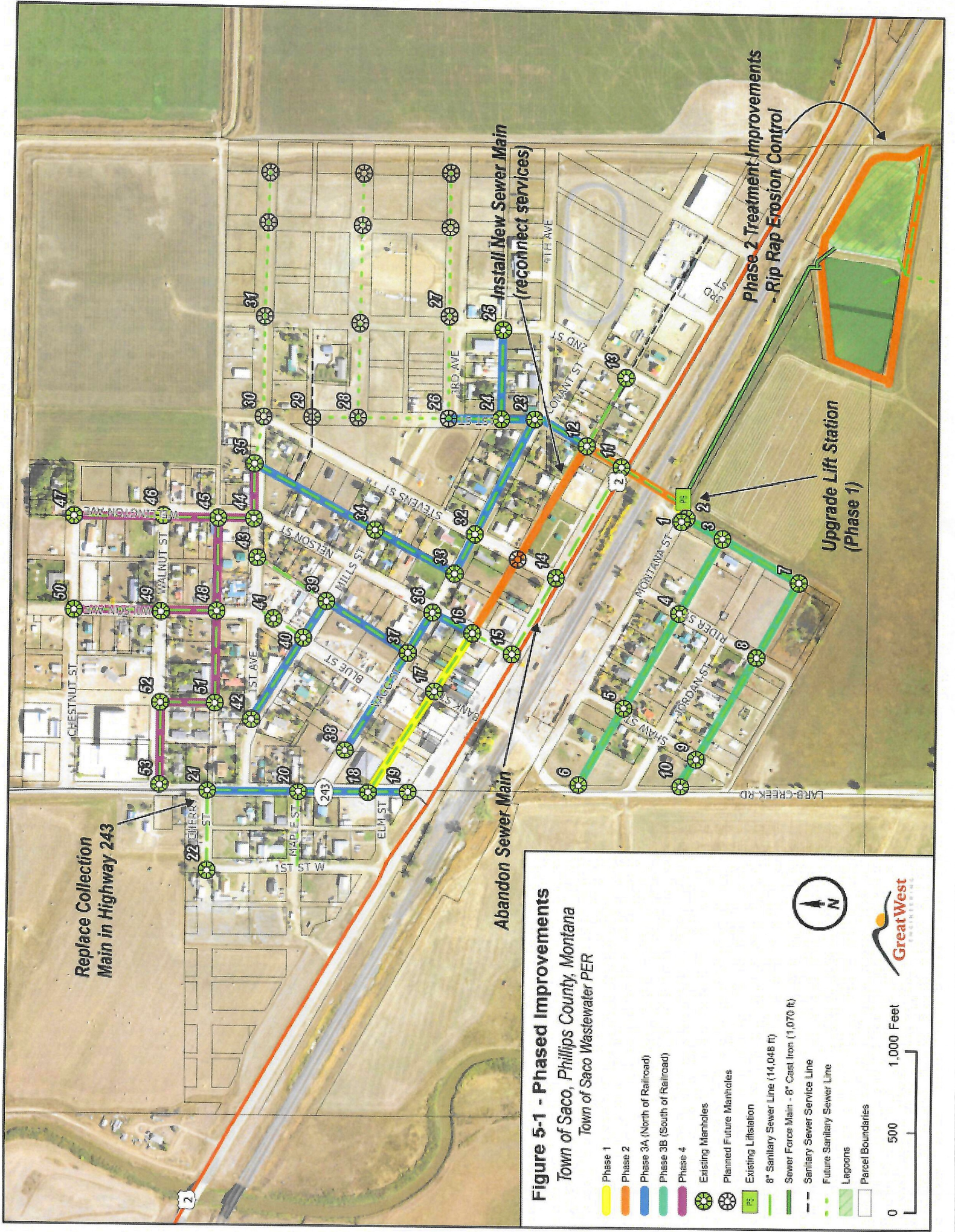
Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Wltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

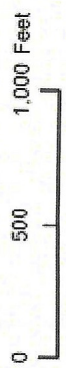
Install New Sewer Main (reconnect services)

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

- Phase 1
- Phase 2
- Phase 3A (North of Railroad)
- Phase 3B (South of Railroad)
- Phase 4
- Existing Manholes
- Planned Future Manholes
- Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- Future Sanitary Sewer Line
- Leagoons
- Parcel Boundaries



Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Harlan Baker
Chairman, Chippewa Cree Tribe
96 Clinic Road
Box Elder, MT 59221
chairman@chippewa-cree.org
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Chairman Baker:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Harlan Baker
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

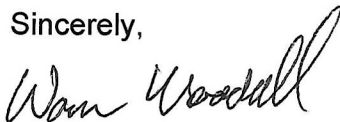
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries

0 500 1,000 Feet

Town of

Saco

PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3512 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Jeffrey Stiffarm
President, Fort Belknap Indian Community
656 Agency Main Street
Harlem, MT 59526
jeffrey.stiffarm@ftbelknap.org
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear President Stiffarm:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Jeffrey Stiffarm
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.


If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

- █ Phase 1
- █ Phase 2
- █ Phase 3A (North of Railroad)
- █ Phase 3B (South of Railroad)
- █ Phase 4
- Existing Manholes
- Planned Future Manholes
- Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- Future Sanitary Sewer Line
- Lagoons
- Parcel Boundaries

0 500 1,000 Feet

Town of

Saco

PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

Jonathan Windy Boy
Tribal Historical Preservation Officer
Chipewa Cree Tribe
P.O. 230
Box Elder, MT 59221
rep32jwb@gmail.com
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Mr. Windy Boy:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

Mr. Jonathan Windy Boy
Page | 2
March 11, 2026

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

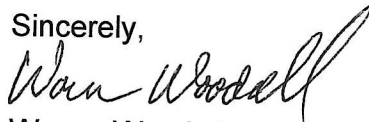
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243


Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries



Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

The Honorable Justin Gray Hawk, Sr.
Chairman, Fort Peck Assiniboine and Sioux Tribes
P.O. Box 1027
Poplar, MT 59255
jgrayhawk@fortpecktribes.net
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Chairman Gray Hawk:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and

The Honorable Justin Gray Hawk, Sr.
Page | 2
March 11, 2026

ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

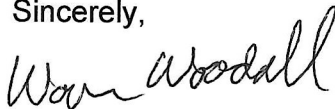
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries

Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@nemontel.net

March 11, 2026

Michael Black Wolf
Tribal Historical Preservation Officer
Fort Belknap Indian Community
656 Agency Main Street
Harlem, MT 59526
mblackwolf@ftbelknap.org
Via USPS and Email

**Re: *Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program***

Dear Mr. Black Wolf:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

Mr. Michael Black Wolf
Page | 2
March 11, 2026

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

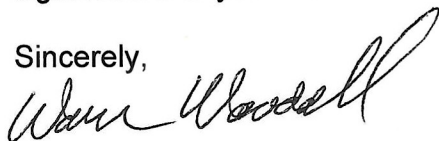
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

<http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

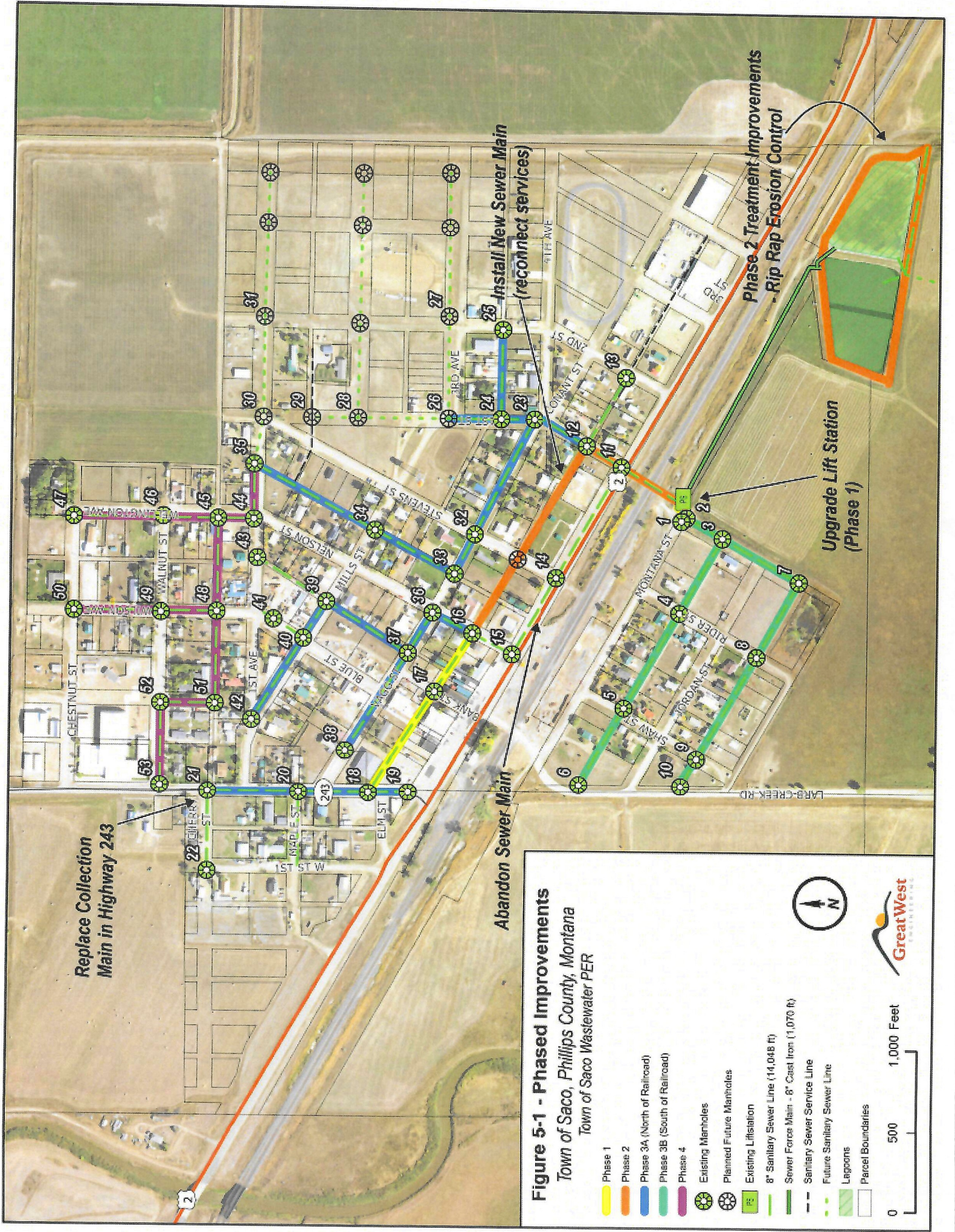
Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

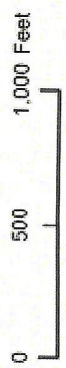
Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

- Phase 1
- Phase 2
- Phase 3A (North of Railroad)
- Phase 3B (South of Railroad)
- Phase 4
- Existing Manholes
- Planned Future Manholes
- Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- Future Sanitary Sewer Line
- Leagoons
- Parcel Boundaries



Town of *Saco*
PO Box 330
110 Nelson Street
Saco, MT 59261

Phone (406) 527-3312 • Fax (406) 527-3232 • email: townsaco@ncomontel.net

March 11, 2026

Teanna Limpy
Tribal Historical Preservation Officer
Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, MT 59043
teanna.limpy@cheyennenation.com
Via USPS and Email

**Re: Town of Saco – Phase 2 Wastewater Improvements Project
HUD Program**

Dear Ms. Limpy:

The Town of Saco is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the Town of Saco has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings, and structures with significant tribal associations.

The Town of Saco will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementation regulations 36 CFR Part 800. We invite you to serve as a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe and, if such properties exist, to assess how the project might affect them. If the project might have adverse effects, we would like to discuss ways to avoid, minimize, or mitigate them.

In January 2022 the Montana Historical Society conducted a cultural resources search (SHPO Project #2022011908) and concluded that there have been a few previously recorded cultural sites within the designated search locale (Section 7, 8, 17, T31N R34E). SHPO concluded that as long as there is no disturbance or alteration to structures over fifty years of age and ground disturbance is kept to previously disturbed areas there is a low likelihood cultural property will be impacted. Additionally, SHPO concluded a cultural resources inventory is unwarranted. However, they state if cultural materials were discovered during the project Montana Historical Society should be contacted and the site investigated.

Ms. Teanna Limpy
Page | 2
March 11, 2026

The proposed project involves a comprehensive upgrade to the existing wastewater collection and treatment systems. The aim is to improve wastewater system efficiency and ensure compliance with regulatory standards. The project is divided into two main components: Phase 2 collection system improvements and minor lagoon upgrades. The Phase 2 collection system improvements will include the replacement and installation of up to 1,700 feet of pipe, along with associated manholes and services from the lift station location and extend north under the highway and railroad crossings via bore and jacking methods, and extending the intersection of Vagg St. and 4th Ave. Additionally, the project will involve the installation or rehabilitation of a new sewer main in within Nelson St. from Taylor St. to Vagg St. The phase also includes rehabilitating the pipe along Highway 2 (Taylor Street) from 1st St. to Nelson St. The lagoon upgrades will only involve minor improvements, such as minor repairs to the lagoon berms including minor earthwork operations will be conducted to build up the existing eroded internal lagoon slopes. Any missing riprap protection will be completed to prevent further slope erosion. Enclosed is a map showing the project area and potential indirect effects.

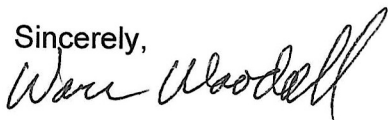
If you would like to be a consulting party on this project, please let us know of your interest within 30 days to meet the project timeline objectives. If you have any initial concerns about the project's impact on religious or cultural properties, please note them in response.

See <http://www.onecpd.info/environmental-review/historic-preservation/>.

HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

Please inform us whether or not you wish to consult on this project. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation. We value your assistance and look forward to consulting with you further if there are historic properties of religious and cultural significance to your tribe that this project may impact.

Sincerely,



Wayne Woodall
Mayor
(406) 527-3312
Mltwrw1@yahoo.com

Enclosures

1. Map, Figure 5-1 – Phased Improvements



Replace Collection Main in Highway 243

Abandon Sewer Main

Phase 2 Treatment Improvements - Rip Rap Erosion Control

Upgrade Lift Station (Phase 1)

Figure 5-1 - Phased Improvements
 Town of Saco, Phillips County, Montana
 Town of Saco Wastewater PER

	Phase 1
	Phase 2
	Phase 3A (North of Railroad)
	Phase 3B (South of Railroad)
	Phase 4
	Existing Manholes
	Planned Future Manholes
	Existing Liftstation
	8" Sanitary Sewer Line (14,048 ft)
	Sewer Force Main - 8" Cast Iron (1,070 ft)
	Sanitary Sewer Service Line
	Future Sanitary Sewer Line
	Leagoons
	Parcel Boundaries

0 500 1,000 Feet

March 31, 2026


Erin McKeon
Montana Department of Commerce
Community Development Division
301 S. Park
P.O. Box 200523
Helena, MT 59620
Via: Erin.Lee@mt.gov

RE: Confirmation of Agency Letters for MT-CDBG-23-PF-02 Environmental Assessment

Dear Erin,

This communication serves to confirm that the Town of Saco validates the Agency Letters submitted by Great West Engineering on behalf of the Town of Saco, which were sent on January 17, 2022, and included in the 2026 Environmental Assessment. These documents accurately reflect the scope of work for the phase 2 wastewater project and will be utilized by the Town to finalize the Environmental Assessment process.

Sincerely,



Signature*

Wayne Woodall, Mayor
Typed Name and Title

See what's possible.



January 17, 2022

Mr. Peter Brown
State Historic Preservation Officer
P.O. Box 201202
Helena, MT 59620-1202

**RE: United States Department of Agriculture (USDA) – Rural Development
(RD) Rural Utilities Service (RUS) Applicant SHPO Section 106 Initiation
Saco Wastewater System Improvements
Saco, Philips County, MT**

Dear State Historic Preservation Officer Brown:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built as shown on the enclosed map. The geographic scope of the APE will not

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, the APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In accordance with this blanket delegation, the Town of Saco is initiating Section 106 review on behalf of RUS. In delegating this authority, RUS is advocating for the direct interaction between its borrowers and the State Historic Preservation Office (SHPO). RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana.

Please review the Project(s) and enclosed maps. After completing your review, please provide the Town of Saco with your recommendation(s) about whether or not a study of the APE is needed to identify potentially affected historic properties. **If you recommend a study, please explain the nature and scope of the proposed investigation, specifically in reference to those factors identified in 36 CFR § 800.4(b)(1).** If you do not recommend a study or require additional information, please provide a proposed finding of no historic properties affected or no adverse effect.

Please submit your recommendations, request for additional information, or a proposed finding, **electronically** within **30** days of your receipt of this request to Kinsee Dodge who can be reached at (406) 495-6172 or kdodge@greatwesteng.com. If no timely response is received, the Town of Saco will notify RUS so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4). Should you have any questions, please contact Kinsee Dodge or Jason Bailey who can be reached at (406) 449-5000 ext. 3879 or Justin.Bailey@usda.gov.

Sincerely,
Great West Engineering, Inc.

Kinsee Dodge, EI
Project Engineer

Enclosure: Maps of Area of Potential Effect

See what's possible.



January 19, 2022

Duane Reid
THPO
Little Shell Tribe
P.O. Box 221
Elmo, MT 59915

**RE: United States Department of Agriculture (USDA) – Rural Development
(RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation
Saco Wastewater System Improvements
Saco, Philips County, MT**

Dear THPO Reid:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

C:\Users\jboettcher\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\IHV8KW9JA\THPO Little Shell Letter.docx

www.greatwesteng.com

HELENA

2501 Belt View Drive
Helena, MT 59601
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, and the Little Shell Tribe of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey's phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response **electronically** by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,
Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge".

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.



January 17, 2022

Bobby Komardley
Chairman
Apache Tribe of Oklahoma
PO Box 1330
Anadarko, AnadarkoOK 70035

RE: United States Department of Agriculture (USDA) – Rural Development (RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation Saco Wastewater System Improvements Saco, Philips County, MT

Dear Chairman Komardley:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey’s phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response electronically by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge".

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



January 17, 2022

AJ Not Afraid
Chairperson
Crow Tribe of Montana
PO Box 159
Crow Agency, Crow Agency MT 59022

RE: United States Department of Agriculture (USDA) – Rural Development (RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation Saco Wastewater System Improvements Saco, Phillips County, MT

Dear Chairperson Not Afraid:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey’s phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response electronically by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Great West Engineering, Inc.

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.



January 17, 2022

Aaron Brien
THPO
Crow Tribe of Montana
PO Box 159
Crow Agency, Crow Agency MT 59022

RE: United States Department of Agriculture (USDA) – Rural Development (RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation Saco Wastewater System Improvements Saco, Philips County, MT

Dear THPO Brien:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey’s phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response electronically by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge".

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



January 17, 2022

Michael Blackwolf
THPO
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
656 Agency Main Street
Harlem, HarlemMT 59526

**RE: United States Department of Agriculture (USDA) – Rural Development
(RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation
Saco Wastewater System Improvements
Saco, Philips County, MT**

Dear THPO Blackwolf:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey’s phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response electronically by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Great West Engineering, Inc.

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.



January 17, 2022

Andrew Werk
President
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
656 Agency Main Street
Harlem, HarlemMT 59526

**RE: United States Department of Agriculture (USDA) – Rural Development
(RD) Rural Utilities Service (RUS) Applicant THPO Section 106 Initiation
Saco Wastewater System Improvements
Saco, Philips County, MT**

Dear President Werk:

The Town of Saco plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its water & waste loan & grant program for Saco Wastewater System Improvements.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, the Town of Saco proposes that the APE for the referenced project consists of disturbed right of way (ROW) in Town and the land owned by the Town which the lift station is built, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its water & waste disposal loan & grant program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

At the direction of RUS, on 2/7/2022 the Town of Saco notified the following Indian tribes about the Saco Wastewater System Improvements: the Apache Tribe of Oklahoma, the Crow Tribe of Montana, and the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Should the referenced tribes elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – 2501 Belt View Dr. Helena, MT 59601 or kdodge@greatwesteng.com.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Saco will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Justin Bailey, State Environmental Coordinator, USDA Rural Development, 790 Colleen Street, Helena, MT 59601. Mr. Bailey’s phone number is (406) 449-5000 ext. 3879, and his email address is Justin.Bailey@usda.gov.

Please submit your response electronically by 2/7/2022. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge".

Kinsee Dodge, EI
Project Engineer

Enclosure: Map of Area of Potential Effects

See what's possible.

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



January 17, 2022

Department of Commerce, Census and Economic Information Center
PO Box 200505
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Commerce, Census and Economic Information Center:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Commerce, Census and Economic Information Center. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Commerce, Census and Economic Information Center has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Department of Labor and Industry
PO Box 1728
Helena MT 59624

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Labor and Industry:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Labor and Industry. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a light blue horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Labor and Industry has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Department of Environmental Quality
Permitting and Compliance Division
PO Box 200901
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Environmental Quality:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Environmental Quality. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Environmental Quality has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



January 17, 2022

Department of Fish, Wildlife and Parks
1420 E. 6th Ave.
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Fish, Wildlife and Parks:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Fish, Wildlife and Parks. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PERIEA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Fish, Wildlife and Parks has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date



MT Fish, Wildlife & Parks
Region 6 Headquarters
1 Airport Rd
Glasgow, MT 59230

January 25, 2022

Great West Engineering, Inc.
2501 Belt View Drive
Helena, MT 59601

RE: Saco Wastewater System Improvement Areas

Dear Kinsee Dodge,

Montana Fish, Wildlife & Parks appreciates the opportunity to comment on the Saco Wastewater System Improvement areas. We do not have any fish and wildlife concerns at this time.

Thank you again for the opportunity to give our comments.

Sincerely,

Drew Henry
Region 6 Supervisor, Glasgow

See what's possible.



January 17, 2022

Department of Natural Resources and Conservation
Attn: Resource Development Bureau Engineer
PO Box 201601
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Natural Resources and Conservation:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Natural Resources and Conservation. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PERIEA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Natural Resources and Conservation has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

From: [Moritz, Anthony](#)
To: [Kinsee Dodge](#)
Cc: townsaco@nemont.net
Subject: RE: Saco Wastewater System Preliminary Engineering Report
Date: Tuesday, February 1, 2022 4:37:25 PM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Kinsee,

The subject project has potential areas of effect in the mapped Zone A floodplain of FIRM panel 3001620625B. Please coordinate with the town of Saco floodplain administrator Clint Simpson.

Saco, Town of Simpson, Clint townsaco@nemont.net (406) 527-
3312 PO Box 330 Saco, MT 59261

Please call or email me if you have any questions.

Thank you,

Anthony Moritz, Engineering Analyst
Montana DNRC, Water Resources Division
Havre Regional Office
Anthony.Moritz@mt.gov
Office: 406 265-5516
Direct: 406 808-7127

See what's possible.



January 17, 2022

Department of Transportation
PO Box 201001
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Transportation:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Transportation. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\IEA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Transportation has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

From: [Murdo, Damon](#)
To: [Kinsee Dodge](#)
Subject: SACO WASTEWATER SYSTEM PER
Date: Thursday, January 20, 2022 4:14:37 PM
Attachments: [Reports.pdf](#)
[Sites.pdf](#)
[2022011908.pdf](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Big Sky. Big Land. Big History.
Montana
Historical Society

January 20, 2022

Kinsee Dodge
Great West Engineering
2501 Belt View Drive
Helena MT 59604

RE: SACO WASTEWATER SYSTEM PER. SHPO Project #: 2022011908

Dear Kinsee:

I have conducted a cultural resource file search for the above-cited project located in Sections 7, 8, 17, T31N R34E. According to our records there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the area. I've attached a list of these sites and reports. If you would like any further information regarding these sites or reports, you may contact me at the number listed below.

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place.

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

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office

File: DEQ/AIR&WATER WASTE MNG/2022

See what's possible.



January 17, 2022

State Historic Preservation Office
PO Box 201202
Helena MT 59620

RE: Saco Wastewater System Preliminary Engineering Report

Dear State Historic Preservation Office:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from State Historic Preservation Office. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] State Historic Preservation Office has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Phillips County
Department of Public Health
314 S 2nd Ave W
Malta MT 59538

RE: Saco Wastewater System Preliminary Engineering Report

Dear Phillips County:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Phillips County. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a light blue horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Phillips County has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

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

RE: Saco Wastewater System Preliminary Engineering Report

Dear US Environmental Protection Agency:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from US Environmental Protection Agency. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] US Environmental Protection Agency has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

US Fish and Wildlife Service
Ecological Services
585 Shepherd Way
Helena MT 59601

RE: Saco Wastewater System Preliminary Engineering Report

Dear US Fish and Wildlife Service:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from US Fish and Wildlife Service. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] US Fish and Wildlife Service has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

From: [Martin, Jacob](#)
To: [Kinsee Dodge](#)
Subject: Saco Wastewater System Preliminary Engineering Report
Date: Thursday, January 27, 2022 11:25:21 AM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Kinsee Dodge:

Thank you for your January 17, 2022, letter, received on January 21, 2022, requesting U.S. Fish and Wildlife Service (USFWS) comment on a proposed wastewater system improvement project at Saco, Phillips County, Montana. The Town of Saco proposes to upgrade, repair, or replace infrastructure associated with wastewater collection and treatment system.

The USFWS reviewed your letter. Based on the information provided, we have no comments regarding federally listed or proposed threatened or endangered species or other trust species. Additional information regarding listed species that may occur within the project footprint may be obtained using the IPaC project-planning tool, which streamlines the USFWS environmental review process at <https://ecos.fws.gov/ipac/>.

Thank you for the opportunity to comment. If you have any questions or comments about this correspondence, please contact me via reply email or at the address or phone numbers, below.

Sincerely,

Jacob M. (Jake) Martin
Assistant Field Supervisor
Montana Ecological Services Office
585 Shephard Way, Suite 1
Helena, Montana 59601
(406) 422-8524 (cell, preferred, I'm teleworking)
(406) 430-9007 (office)
jacob_martin@fws.gov

See what's possible.



January 17, 2022

US Forest Service
Region 1
26 Fort Missoula RD
Missoula MT 59804

RE: Saco Wastewater System Preliminary Engineering Report

Dear US Forest Service:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from US Forest Service. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WWW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a light blue horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] US Forest Service has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

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

RE: Saco Wastewater System Preliminary Engineering Report

Dear US Army Corps of Engineers:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from US Army Corps of Engineers. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PERIEA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] US Army Corps of Engineers has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

From: [Borrego, Jerin E CIV USARMY CENWO \(USA\)](#)
To: [Kinsee Dodge](#)
Subject: RE: Saco Wastewater System Preliminary Engineering Report - Project Area Comments
Date: Wednesday, January 19, 2022 10:13:47 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Kinsee Dodge,

This email is to inform you that USACE has received your request for comments. The project number assigned is NWO-2022-00115-MT. A project manager will be assigned and will reach out to you shortly.

Sincerely,

Jerin Borrego

Regulatory Project Manager
U.S. Army Corps of Engineers
100 Neill Avenue, Suite 200
Helena, Montana 59601
Work Cell: 406-417-1370
Jerin.E.Borrego@usace.army.mil

The Montana Regulatory Office is now accepting digital submittals! Effective immediately, please submit new requests in digital form to Montana.Reg@usace.army.mil for initial in-processing. (NOTE: Emails including attachments cannot exceed 40Mb). Further information and instructions regarding submitting requests electronically can be found at: <https://www.nwo.usace.army.mil/Missions/Regulatory-Program/Montana/>

Regulatory Customer Service Survey: <https://regulatory.ops.usace.army.mil/customer-service-survey/>

From: Kinsee Dodge <kdodge@greatwesteng.com>
Sent: Wednesday, January 19, 2022 8:59 AM
To: Montana.Reg <Montana.Reg@usace.army.mil>
Subject: [URL Verdict: Neutral][Non-DoD Source] Saco Wastewater System Preliminary Engineering Report - Project Area Comments

Good morning,

I am reaching out regarding a proposed Wastewater System Improvement project that is in

development in Saco, Montana. The attached letter and maps outline this project and the associated project area, of which any comments concerning the project area would be appreciated at this time. Please distribute this accordingly, and I look forward to receiving any feedback by February 7,2022.

Please feel free to reach out with any questions or concerns.

Thank you,



Kinsee Dodge, EI

d: [\(406\) 495-6172](tel:(406)495-6172)

o: [\(406\) 449-8627](tel:(406)449-8627)

2501 Belt View Drive
Helena, MT 59601

See what's possible.



January 17, 2022

National Park Service
PO Box 25287
Denver CO 80225

RE: Saco Wastewater System Preliminary Engineering Report

Dear National Park Service:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from National Park Service. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names being clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] National Park Service has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

From: [Martin, Jacob](#)
To: [Kinsee Dodge](#)
Subject: Saco Wastewater System Preliminary Engineering Report
Date: Thursday, January 27, 2022 11:25:21 AM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Kinsee Dodge:

Thank you for your January 17, 2022, letter, received on January 21, 2022, requesting U.S. Fish and Wildlife Service (USFWS) comment on a proposed wastewater system improvement project at Saco, Phillips County, Montana. The Town of Saco proposes to upgrade, repair, or replace infrastructure associated with wastewater collection and treatment system.

The USFWS reviewed your letter. Based on the information provided, we have no comments regarding federally listed or proposed threatened or endangered species or other trust species. Additional information regarding listed species that may occur within the project footprint may be obtained using the IPaC project-planning tool, which streamlines the USFWS environmental review process at <https://ecos.fws.gov/ipac/>.

Thank you for the opportunity to comment. If you have any questions or comments about this correspondence, please contact me via reply email or at the address or phone numbers, below.

Sincerely,

Jacob M. (Jake) Martin
Assistant Field Supervisor
Montana Ecological Services Office
585 Shephard Way, Suite 1
Helena, Montana 59601
(406) 422-8524 (cell, preferred, I'm teleworking)
(406) 430-9007 (office)
jacob_martin@fws.gov

See what's possible.



January 17, 2022

Federal Aviation Administration
Airport District Office
2725 Skyway Drive
Suite 2
Helena MT 59602

RE: Saco Wastewater System Preliminary Engineering Report

Dear Federal Aviation Administration:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Federal Aviation Administration. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge".

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Federal Aviation Administration has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Bureau of Land Management
5001 Southgate Drive
Billings MT 59101

RE: Saco Wastewater System Preliminary Engineering Report

Dear Bureau of Land Management:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Bureau of Land Management. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Bureau of Land Management has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Bureau of Indian Affairs
2021 4th Ave N.
Billings MT 59101

RE: Saco Wastewater System Preliminary Engineering Report

Dear Bureau of Indian Affairs:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Bureau of Indian Affairs. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\11-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Bureau of Indian Affairs has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Natural Resource Conservation Service
10 E. Babcock St.
Bozeman MT 59771

RE: Saco Wastewater System Preliminary Engineering Report

Dear Natural Resource Conservation Service:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Natural Resource Conservation Service. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, with the first and last names clearly legible.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Natural Resource Conservation Service has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

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

RE: Saco Wastewater System Preliminary Engineering Report

Dear Occupational Safety and Health Administration:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Occupational Safety and Health Administration. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\IEA Letters\IEA Letter-Saco WW.docx

www.greatwesteng.com

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Occupational Safety and Health Administration has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

US Department of Transportation
585 Shephard Way
Helena MT 59601

RE: Saco Wastewater System Preliminary Engineering Report

Dear US Department of Transportation:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from US Department of Transportation. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] US Department of Transportation has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.



January 17, 2022

Department of Natural Resources and Conservation Water Resources Regional Office
Attn: Regional Engineering Specialist
PO Box 1828
Havre MT 59501

RE: Saco Wastewater System Preliminary Engineering Report

Dear Department of Natural Resources and Conservation Water Resources Regional Office:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from Department of Natural Resources and Conservation Water Resources Regional Office. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\T02 - WW PER\Project\Reports\PER\IEA Letters\IEA Letter-Saco WW.docx

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a light blue horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] Department of Natural Resources and Conservation Water Resources Regional Office has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

See what's possible.

HELENA

PO Box 4817
2501 Belt View Drive
Helena, MT 59604
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center
Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

3050 N Lakeharbor
Lane
Suite 201
Boise, ID 83703
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street S, #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

9221 N Division Street
Suite F
Spokane, WA 99218
Ph: (509) 413-1430



January 17, 2022

BNSF Permitting
Attn: Jones Lang LaSalle Brokerage, Inc.
4200 Buckingham Rd, Suite 110
Fort Worth TX 76155

RE: Saco Wastewater System Preliminary Engineering Report

Dear BNSF Permitting:

The Town of Saco is proposing to review and upgrade their current public wastewater system. The purpose of this letter is to solicit comments of any concerns about construction within the project area. The Town of Saco is located in Philips County, northeastern Montana along U.S. Highway 2, about 25 miles east of Malta. The project area will be specifically located within:

- Township 31 North, Range 34 East, Sections: 7, 8, & 17

To help visualize the proposed project area, maps of the existing wastewater system and the proposed improvements are enclosed with this letter.

The wastewater system was originally constructed in the early 1900's and consists of around 14,000 feet of vitrified clay pipe (VCP) and a community lift station. In the 1960's, the lift station was replaced and a 5-acre, two cell facultative lagoon system was constructed at the southeast corner of town. The Town's wastewater is pumped from the community through this wet well/dry well type primary lift station to the lagoon system. The lagoons are discharged into an unnamed slough that empties into Beaver Creek which is an impaired waterbody on the 303(d) list. The lift station is outdated, very deep and unsafe. The collection system is in a degraded state as evidenced by recent video inspection.

The goal of this project is to review the existing wastewater system, identify deficiencies, and make improvements to correct the inadequacies. The primary concerns of the current system are excess sludge accumulation in the lagoons, failed lagoon valves, discharge permit violations primarily for E. coli, inadequate safe access to the drywell, and an absence of bypass system around the wet wells. Additionally, the lift station and much of the collection system pipe is operating beyond useful design life, and the system is frequently overwhelmed during high rainfall events. Finally, the lift station lacks backup power and an automated alarm system in case of emergency.

The proposed improvements, as indicated on the attached maps, may include collection pipeline replacements primarily within Town limits and public right of ways, collection pipe replacement under Highway 2 and the BNSF railroad, a full lift station upgrade, and lagoon treatment system upgrades to be determined by the PER.

We would appreciate feedback and comments from BNSF Railroad. Please send your response back to me by February 7, 2022, at kdodge@greatwesteng.com or the following address:

Y:\Shared\Helena Projects\1-21222-Saco On-Call 2021-2026\TO2 - WW PER\Project\Reports\PER\EA Letters\EA Letter-Saco WW.docx

www.greatwesteng.com



Great West Engineering, Inc.
Attn: Kinsee Dodge
2501 Belt View Drive
Helena, MT 59601
406-495-6172

Sincerely,

Great West Engineering, Inc.

A handwritten signature in black ink that reads "Kinsee Dodge". The signature is fluid and cursive, written over a horizontal line.

Kinsee Dodge, EI
Project Engineer

Attached: Figure 1 and Figure 2 of Potential Wastewater System Improvement Areas

[] BNSF Permitting has reviewed the enclosed information and has no comment on the project at this time.

Signature

Date

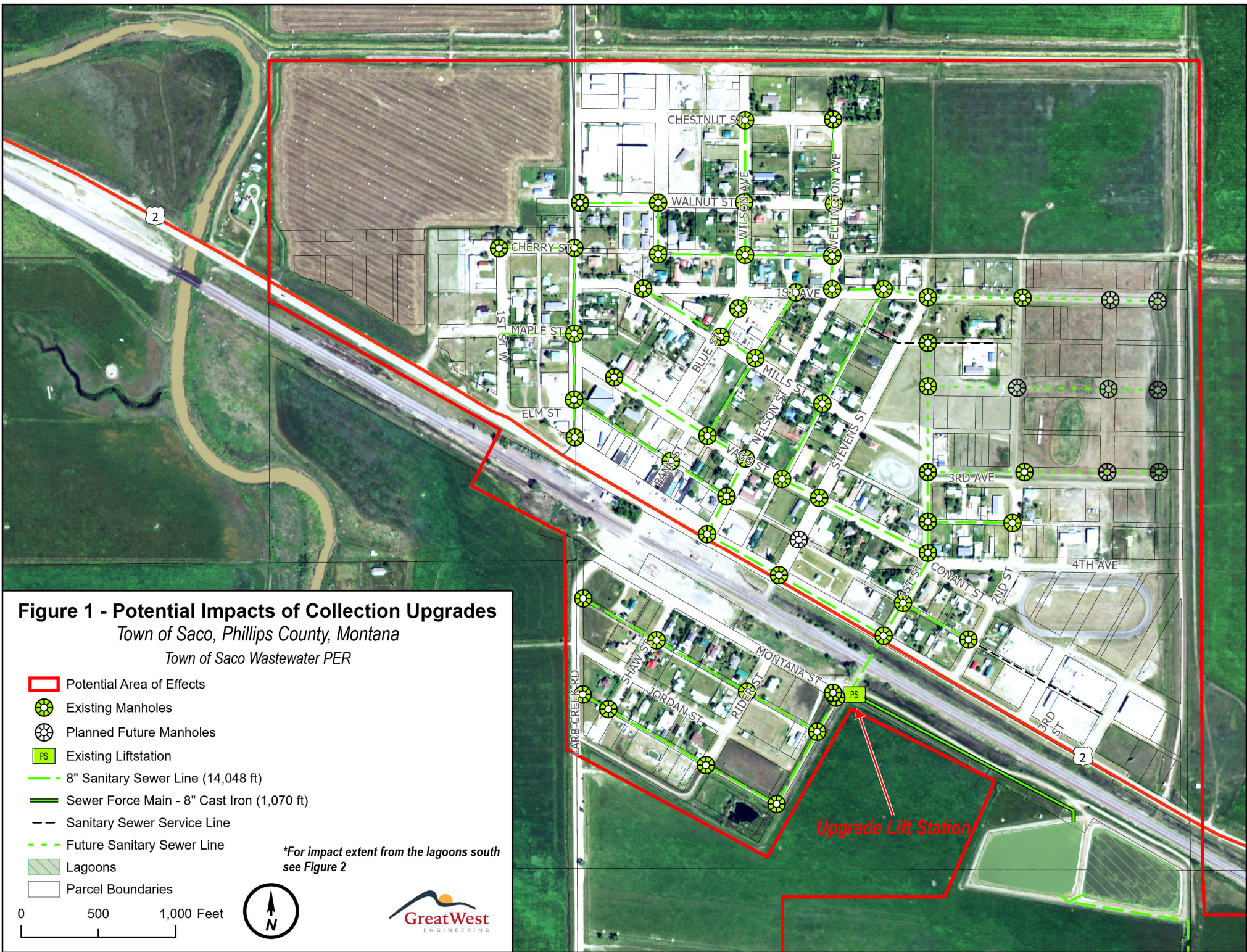






Figure 1 - Potential Impacts of Collection Upgrades

Town of Saco, Phillips County, Montana

Town of Saco Wastewater PER

- ▭ Potential Area of Effects
-  Existing Manholes
-  Planned Future Manholes
- PS Existing Liftstation
- 8" Sanitary Sewer Line (14,048 ft)
- Sewer Force Main - 8" Cast Iron (1,070 ft)
- Sanitary Sewer Service Line
- - - Future Sanitary Sewer Line
-  Lagoons
-  Parcel Boundaries

*For impact extent from the lagoons south see Figure 2

0 500 1,000 Feet



Upgrade Lift Station

