

Chris Taggart

From: John Palacio
Sent: Tuesday, November 10, 2020 12:56 PM
To: Chris Taggart
Subject: Fwd: [EXTERNAL] RE: Regs Revision
Attachments: image003.png; Rogers letter 80520.pdf; BoH Letter 8 2020.pdf

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Begin forwarded message:

From: Jim Bachand <jBachand@missoularealestate.com>
Date: November 10, 2020 at 12:23:25 PM MST
To: John Palacio <jpalacio@rc.mt.gov>
Cc: Dwight Easton <Deaston@missoularealestate.com>, "Snook, Mandy" <mandy@mtlandcompany.com>, Angela Previte <angela.previte@bhhsmt.com>, "Michael (Mike) Kent" <mkent@coldwellbankerwsa.com>, Sherry Shipley <allaccessmtre@gmail.com>
Subject: [EXTERNAL] RE: Regs Revision

Attention Ravalli County Board of Health Members;

Thank you for the opportunity to review and comment on the proposed regulations. The REALTOR® associations greatly appreciated the dialog and proposed changes to the latest draft. There are several items from prior communications that remain outstanding. For example, the July 30 letter (see attached), with the following concerns:

- The 'why' a need for these changes has not be presented to the community. A change of this magnitude requires a cited peer reviewed environmental impact study, supporting any water quality degradation in Ravalli County due to septic systems.
- No allowance and no process were included in the latest draft for a non-conforming existing system, that are safe, and where there isn't an increased total flow to the wastewater system.
- The reference to ARM (section 1.6.8) of a Failed system is helpful, please include plain language for homeowners.
- Additionally, this draft has introduced a new word 'failing' Wastewater System in 3.2.1. Failing is not defined, it should either be defined or removed.

In an August 5 email (see attached), Mr. De Hann acknowledged there are situations where systems might be "non-conforming" under the new definition and yet the current performance does not increase total flow to the system and is not unsafe or a health risk. As such, many homeowners may have a non-conforming/performing system that the current proposal would deem unlawfully; creating unnecessary hardship on Ravalli County Homeowners and the Health Department.

We strongly encourage the Health Board to educate the public (REALTOR® customers and your citizens) why a retired couple of two with a fully functioning wastewater system would be required to spend thousands of dollars on changes when in their view, nothing is broken (or in the words of the subcommittee is a Non-conforming, Failed, and unlawfully system)?

Based upon the above items we recommend delaying any first 1st reading until these items are discussed and resolved.

We look forward to continuing to work towards reasonable rules that protect Ravalli County's health, safety, and environment.

Sincerely,
Jim Bachand

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From: John Palacio <jpalacio@rc.mt.gov>
Sent: Sunday, November 1, 2020 10:17 PM
Subject: Regs Revision

Hello all, the Ravalli County Board of Health (BOH) will be reviewing the attached proposed DRAFT at the November 10, 2020, BOH meeting. The meeting will be held at 1 pm in the Commissioner's Meeting Room, located on the 3rd floor of the Administrative Building at 215 S. 4th St., Hamilton.

The attached document is a DRAFT that will be review by the BOH to prepare for a first reading. **The meeting on November 10, 2020, IS NOT A FIRST READING.** The discussion and purpose of the review is to have a draft ready for the first reading. The date of the first reading may be determined in the November 10 meeting.

Comments may be made in person at the meeting or sent via email to jpalacio@rc.mt.gov, by mail to RCEH 215 S. 4th St., Suite D, Hamilton, MT 59840, or dropped off at the Ravalli County Environmental Health office. The meeting will also be live streamed online through Granicus. Please see the link below to the Granicus live stream.

<https://ravalli.us/493/Live-and-Archived-Meetings-Audio-Video>

For contacts receiving this email as an email contact of an association, company, or group, please forward the email to interested members of your party. Thank you.

John Palacio, R.S., M.P.H.

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