

Thomas Tupling

Lake Chelan Sewer District (LCSD) urges Ecology to allocate additional funding to complete the planning phase of its critical sewer infrastructure project and to advance the design phase without delay. LCSD is under contract with Ecology as of March 4, 2025, for \$160,434 in planning funds, but an additional \$61,370 is needed to complete the General Sewer Plan (GSP). The \$1.12 million design phase is fully scoped and ready to begin immediately upon securing funding.

LCSD's aging sewer infrastructure poses an imminent risk to Lake Chelan's water quality. The collection system is directly adjacent to and within the lake, including six sewage lift stations on the shoreline and a primary force main buried beneath the lake's normal operating level. A failure anywhere in the system could result in immediate contamination of one of the nation's most pristine freshwater lakes, impacting drinking water supplies, fisheries, recreation, tourism, and the local economy. This project is long overdue and must be addressed now to prevent an environmental disaster.

LCSD meets most of Ecology's SCPPL prioritization criteria for funding, including having an active agreement, significant progress on planning, and immediate readiness to proceed with design. Without additional funding, the project will be delayed, increasing the risk of failure and environmental harm. LCSD respectfully requests that Ecology allocate \$61,370 to complete planning and consider \$1.12 million for design. If full design funding is not available, LCSD is open to a phased approach to ensure steady progress toward construction.

A formal letter providing additional details has been uploaded as an attachment, along with an LCSD sewer system map demonstrating the high risk of contamination due to the infrastructure's proximity to the lake.



March 6, 2025

Lake Chelan Sewer District

Attn: Mark Babcock, Board Chair
135 E. Johnson
Chelan, WA 98816
MBabcock@cityofchelan.us
206-947-4366

Washington State Department of Ecology

Attn: Public Comment Review Committee
Water Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: Public Comment on FY 2026 Draft Water Quality Funding Offer List & Intended Use Plan – Lake Chelan Sewer District’s Critical Funding Needs

Dear Public Comment Review Committee,

Lake Chelan Sewer District (LCSD) appreciates the opportunity to provide public comment on the Washington State Department of Ecology’s Draft Water Quality Funding Offer List and Intended Use Plan for the State Fiscal Year 2026 funding cycle. We write to express our urgent need for additional funding to complete the planning phase of our critical sewer infrastructure project and to immediately advance the design phase upon securing necessary funds.

We understand that the demand for funding in this cycle far exceeds available resources and that Ecology applied a prioritization process for the Small Community Project Priority List (SCPPL) based on the following six criteria:

1. **Existing active agreements with Ecology**
2. **Existing construction projects requiring additional funding for completion**
3. **Funding spent to date for open wastewater agreement(s)**
4. **Construction hardship eligibility**
5. **Estimated date(s) funds were needed**
6. **Status of PRPR reporting, including project progress**

LCSD meets the majority of these priority criteria, demonstrating both the urgency of our project and our readiness to effectively utilize additional funds:

- **Active Agreement with Ecology (#1):** LCSD is formally under contract with Ecology as of March 4, 2025, for \$160,434 in planning funding.
- **Funding Spent to Date (#3):** LCSD acted proactively upon notification of its initial award in January 2024 by requesting and receiving permission from Ecology to begin work immediately, before a formal contract was in place. Work began in April 2024, and substantial progress has been made. The first reimbursement request, submitted on March 6, 2025, accounts for 56% of the Ecology-funded portion of the project.
- **Estimated Date Funds Are Needed (#5):** LCSD requires an additional **\$61,370** to complete the General Sewer Plan (GSP), which is projected for submission to Ecology in May 2025. The design phase, estimated at **\$1.12 million**, is fully scoped and ready to begin immediately upon securing funding.
- **Project Progress and PRPR Reporting (#6):** LCSD has demonstrated significant progress in advancing the project (per Ecology, minimum 20% spent) while awaiting a formal contract. The first PRPR submission covers 56% of the planning budget, and the remaining planning work will be completed on schedule.

While LCSD is still in the planning phase, we anticipate meeting **construction hardship eligibility (#4)** as the project progresses, given the financial constraints of the District and the necessity of securing full funding to complete these critical infrastructure upgrades.

Beyond meeting these priority criteria, our project aligns directly with Ecology's mission and water quality protection goals:

- **Environmental and Public Health Risk:** LCSD's aging sewer infrastructure is at risk of failure, directly threatening Lake Chelan's water quality. As one of the largest and deepest freshwater lakes in the U.S., its clear, glacier-fed waters support drinking water supplies, fisheries, recreation, and tourism. The proximity of LCSD's sewer collection system to the lake makes it extremely vulnerable to contamination. In addition to aging sewer mains, the system includes decades-old septic systems from when the area was primarily weekend cabins, orchards, and farms. Approximately two-thirds of LCSD's customers are shoreline residences, and all six sewage lift stations are either on the shoreline or within the lake itself. The District's primary force main, carrying pumped sewage along its entire service area, is buried beneath the lake's normal operating level. This infrastructure is beyond its useful life, and failure is not a question of if, but when—posing an imminent risk of contamination to one of the nation's most pristine freshwater lakes and the communities that depend on it. Immediate infrastructure upgrades are essential to preventing an environmental disaster.
- **Immediate Readiness to Proceed:** Design work can begin immediately upon funding award, ensuring rapid utilization of funds and project momentum.
- **Demonstrated Commitment and Progress:** LCSD has proactively advanced the project despite delays in formal contracting, demonstrating responsible fiscal management and a commitment to completion.

Given the urgency of this project and our demonstrated alignment with Ecology's funding priorities, LCSD respectfully requests that Ecology allocate an additional **\$61,370** to complete the planning phase and consider allocating **\$1.12 million** for the design phase so that LCSD can immediately begin Design once the Planning phase is complete and avoid delays. If full funding for Design cannot be allocated at this time, we remain flexible and are open to a phased Design approach that is more fundable to ensure steady progress toward construction.

Enclosed is an **LCSD sewer system map** demonstrating the proximity of key infrastructure to Lake Chelan and the high risk of contamination in the event of a system failure.

We appreciate your consideration of our request and remain committed to working collaboratively with Ecology to advance this essential project. Please do not hesitate to contact us should you require any additional information.

Sincerely,


Mark Babcock (Mar 6, 2025 14:07 PST)

Mark Babcock
Board Chair
Lake Chelan Sewer District

Enclosure: LCSD Sewer System Map






LCSD_ECY Public Comment Letter_3.7.25_DRAFT

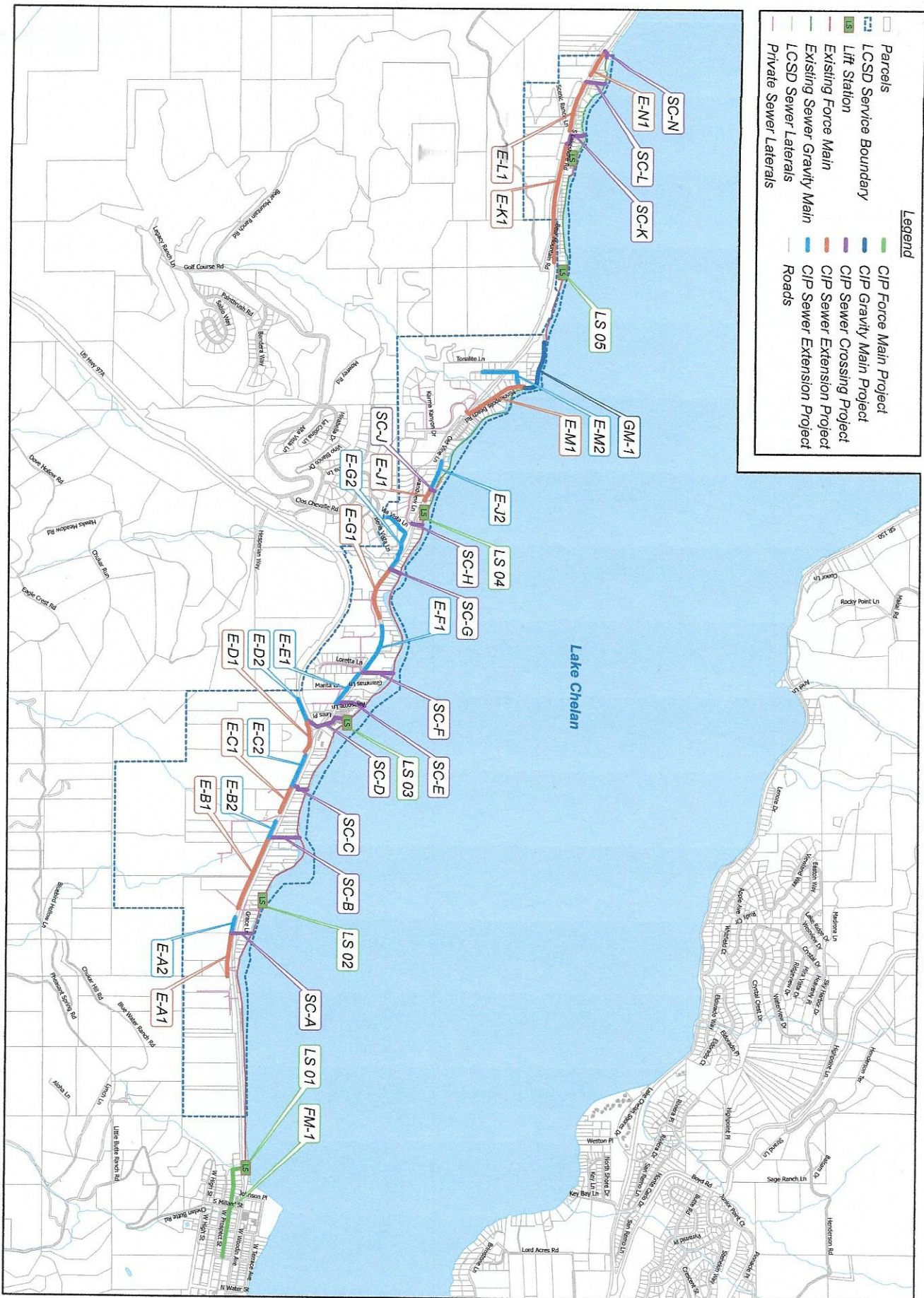
Final Audit Report

2025-03-06

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RH2
NORTH

1:3,600
0 400 800 1200
DRAWING IS FULL SCALE
WHEN BAR MEASURES 2"

Figure 6
Capital Improvement Projects
Lake Chelan Sewer District
General Sewer Plan

Victim's Map

PRELIMINARY

This map is a graphic representation of information provided to the City of Lake Chelan Sewer District. It was designed and developed for LCSD staff use only. It is not intended for public use. The map is based on the data provided to the City of Lake Chelan Sewer District. Any updates or changes to the map should be made by the City of Lake Chelan Sewer District. This map is not a legal document. It is provided for informational purposes only. The map is not to be used for any other purpose without the express written authorization of the City of Lake Chelan Sewer District. This map is the property of the City of Lake Chelan Sewer District and is not to be reproduced or distributed without the express written authorization of the City of Lake Chelan Sewer District.