



OFFICE OF CIVIL RIGHTS AND ADJUDICATION

WASHINGTON, D.C. 20460

March 4, 2026

Kisha Cornell, County Administrator
Stillwater County
PO Box 970
Columbus, MT 59019
via email: kcornell@stillwatercountymt.gov

Roger Webb, President
Park City Water and Sewer District Board
via email: rwebb@stillwatercountymt.gov

RE: Rejection of EPA Complaint No. 08-26-R8

Dear County Administrator Cornell and President Webb:

As you are aware, the U.S. Environmental Protection Agency (EPA), Office of Civil Rights and Adjudication (OCRA), External Civil Rights Division (ECRD) received the above-referenced complaint against Park City Water and Sewer District (Park City). The complaint raises allegations of discrimination by Park City on the bases of age and disability by disconnecting sewer lines in the Homestead RV and Mobile Home Park (Lots 1 through 7), thereby displacing individuals who were elderly, disabled, and children. The complaint further alleges the improper and retaliatory actions taken by Park City in shutting down sewage services, resulting in the displacement of tenants and interfering with their housing rights.¹

This letter serves to notify you that ECRD is rejecting the complaint.

Pursuant to EPA's nondiscrimination regulation, ECRD must conduct a preliminary jurisdictional review of administrative complaints to determine whether to accept, reject, or refer it to an appropriate federal agency. See 40 C.F.R. § 7.120(d)(1). To be accepted for investigation, a complaint must meet the jurisdictional requirements described in EPA's nondiscrimination regulation.

¹ See Complaint No. 08-26-R8

First, the complainant must submit a complaint in writing. *See* 40 C.F.R. § 7.120(b)(1). Second, the entity that the complainant identifies as allegedly engaging in discrimination must be an applicant for, or recipient of, EPA financial assistance. *See* 40 C.F.R. § 7.15.

Third, the complainant must describe an alleged discriminatory act that, if true, may violate EPA's nondiscrimination regulation. *See* 40 C.F.R. § 7.120(b)(1). An alleged discriminatory act is one based on race, color, national origin, sex, age, or disability. Fourth, a complainant must file the complaint within 180 days of the alleged discriminatory act. *See* 7.120(b)(2).

After careful consideration, ECRD must reject this complaint because Park City is not a recipient of EPA financial assistance. Furthermore, the complaint does not specify a discriminatory incident that occurred within 180 days.

Finally, EPA's nondiscrimination regulation prohibits applicants, recipients, and other persons from intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they have acted or participated in an action to secure rights protected by the civil rights requirements EPA enforces. *See* 40 C.F.R. § 7.100. Any individual that opines a recipient has engaged in such misconduct can file a complaint with EPA.

If you have any questions, please contact Case Manager Trinita Mason by email at Mason.Trinita@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Juan Carlos Hunt". The signature is written in a cursive, flowing style.

JuanCarlos M. Hunt, Director
U.S. EPA, Office of Civil Rights and Adjudication

cc: Mark Smith, Deputy Regional Administrator/Deputy Civil Rights Official
Kenneth Schefski, Regional Counsel
U.S. EPA, Region 8