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via EM

Bitterrooters for Planning appreciates the opportunity to comment on the Mountain Park Estates subdivision on Sweeney Creek Loop. We believe there are valid concerns about the results of the spring 2017 groundwater monitoring that are significant enough to require further testing in spring of 2019.

We've identified the following as issues of concern:

- The terminology needs to be clarified among all parties. The county no longer conducts so-called "perc tests." Rather, the issue of concern is groundwater monitoring which is necessary for safe and legal septic installation.
- The timing of the groundwater monitoring and the operational status of a nearby irrigation ditch are of key importance, since about a dozen of the ground water monitoring test holes failed when there was no irrigation water flowing in the Martin ditch during groundwater monitoring in spring 2017.
- June 2018 saw above average precipitation at 2.5" by June 28, a half inch above average. (Source: KECI meteorologist)
- Observations by a local neighboring landowner in spring 2018 found that additional water monitoring test holes (more than the test holes listed in the application) held water.

To summarize, the conditions under which the groundwater monitoring was conducted do not reflect normal conditions: numerous water monitoring holes failed, (that is, they held too much water for safe and legal septic installation). These monitoring holes failed despite the fact that no irrigation water was flowing through the irrigation ditch, and the ground was drier than it is when the irrigation ditch is operational. Additionally, spring 2018 was wetter than average, filling additional test holes with water.

There is precedent in Ravalli County for rejecting the results of groundwater monitoring when the monitoring was done under extraordinary circumstances, such as in the case of Mountain Park Estates.

Given the inaccurate water monitoring results, a preliminary plat decision at this time would be based on inaccurate water monitoring data.

If the commission votes to give preliminary plat approval for this proposal, **we ask that the approval be conditioned on the results of water monitoring in spring 2019**, when the irrigation ditch will be operational and results will be more accurate. Conditioning the preliminary plat approval on further groundwater monitoring will also provide the critical data the Montana Department of Environmental Quality needs for an accurate and thorough review.

Thank you,

Carlotta Grandstaff
Communications Director, BfP