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Comments: Holland Lake Lodge Proposed Expansion - Comments

1.Holland Lake Lodge (the resort) must apply for a water right for the planned increased use of groundwater. The resort master development plan states that the resort will use two new wells, each pumping at a rate not to exceed 35 gallons per minute (gpm) to supply the resort's needs. The 35 gpm rate is the maximum the State of Montana will allow to be pumped from a water well without having a water right. The stated intention in the master plan is to use more than 35 gpm for a single purpose: the resort. The stated "layered approach" described in the master plan is an attempt to avoid having to get a water right. The owners of the resort must apply to the State of Montana for a water right.

2.The resort's proposed water use should be classified as a non-transient non-community water supply system. The state defines a water system that "regularly serves at least 25 of the same persons over 6 months per year" as a non-transient non-community water supply system. The resort master plan states that the current staff is 12 and that 25 new positions will be added, and the resort will operate year-round. This is greater than 25 persons exposed to the drinking water for over 6 months a year. The resort master plan proposes a "layered approach" using two water wells to establish two transient non-community water systems. The presumed assumption is that half the staff will always drink from one system and other half will only drink from the other system. This assumption is to no avail, because the water pumped from each well is essentially the same water. This is an attempt to avoid state rules governing the development and monitoring of a non-transient non-community public water system. If the master plan approach is allowed the resort expansion will expose the resort staff and the public to a health risk. The water system should be classified as a non-transient non-community public water system. A non-transient non-community water system has responsibilities defined in Montana law and rules to protect public health.

3.The resort master plan states that during the summer when the resort operation is at peak, they will have to increase the rate and duration of the surface application (irrigation on the ground) of wastewater. Appendix B of the resort master plan indicates that the wastewater will be applied in the same manner as currently practiced, in other words from a single sprayer. Due to the greater volume of wastewater that would be applied there is a potential that the wastewater will percolate to groundwater resulting in degradation of water quality. The rate of wastewater application may exceed the combined evaporation and evapotranspiration rates, resulting in wastewater impact to groundwater quality.

4.The Holland Lake Campground well(s) appear likely to be down gradient, in terms of groundwater flow direction, relative to the wastewater irrigation site. The potential that wastewater irrigation may impact groundwater quality and thus the quality of drinking water supply must be quantitatively evaluated using methods approved by the county and state.

5.The proposed development timeline is short. Wetlands in the project area cannot be studied and delineated until spring.

Respectively submitted.

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