

September 19, 2022

Dear U.S. Forest Service Resource Managers:

I am writing to express opposition to the proposed Holland Lake Lodge (HLL) expansion. An expansion of this magnitude requires absolute adherence to environmental review under NEPA laws. This is not simply a reconstruction and rehabilitation project; this is a substantial expansion. The idea that this expansion could be carried out using a Categorical Exemption blatantly disregards substantial impacts to current public users, current Bob Marshall wilderness outfitters and many environmental resources.

- User Impacts. The HLL expansion would generate more than 3 times the patrons, warranting evaluation of impacts on existing users in the immediate Holland Lake area (lake and trails), as well as an evaluation of impacts to surrounding area resources (Lindberg Lake and hiking trails in both the Mission and Swan mountains).

Further, the environmental impacts of at the HLL lease area itself include noise, traffic, solid waste generation, water resource use and wastewater disposal.

- Traffic. The HLL entrance road approach was never designed for this traffic load. Expansion of HLL will add substantial traffic to and from Highway MT-83, warranting evaluation of safe sight distances, the need for a turn lane or other traffic control measures. In short, a full traffic study is needed.

The sustainability of water and wastewater to support HLL expansion requires not only environmental review, but in-depth engineering evaluation.

- Water Demand. With 156 overnight patrons, through rental cabins and hotel space, 100-seat restaurant, RV spaces, staff housing, the HLL expansion lodge will likely require in excess of 10,000 gpd of potable water. Additionally, the expanded lodge/resort will also demand fire suppression (which commonly requires 500 gpm flows in rural areas, as directed by the local fire department or the State Fire Marshall), and irrigation demands (assuming 7 acres of irrigated area, at typical irrigation rates, will exceed 25,000 gpd). The current public water supply system serving the lodge and campgrounds was not designed for this sustained demand, nor the much high peak instantaneous demand of numerous fixtures being run simultaneously. The HLL project documents indicate that 2 new wells will be drilled, and existing wells converted to fire suppression and irrigation. However, a detailed review has not been conducted to determine if the groundwater aquifer can support this substantial, sustained demand. In reviewing the Montana Bureau of Mines and Geology database of wells, few wells in the Holland vicinity can produce the water necessary to meet the expansion demands. The current HLL public wells underwent minimal pump testing to determine sustainable pumping rates and may, in actuality be directly re-charged by surface water. Much more hydrogeological investigation is needed.
- Water Rights. Drilling new groundwater wells totaling more than 35 gpm (gallons per minute) and 10 acre-feet will require new water rights through the permit process at Montana DNRC.

The proposed new wells will need to be pump tested for longer durations (typically 24 hours) to determine their sustainability and potential impacts to adjacent water users (with earlier priority water right dates). This is much more substantial review than the historic wells underwent. Additionally, the pump testing and water modeling will need to determine if the water is groundwater or surface water in nature. Further, the water rights process will include a public comment process.

- Potable Water Disinfection/Treatment. The current wells serving HLL (GWIC# 251825 and GWIC#142309) are very shallow and were “grandfathered” into use. However, newly drilled public wells drilled into the same aquifer will prompt full-time disinfection of the potable water supply (Per Circular DEQ-1 and Circular DEQ-3 Design standards), which must meet adequate contact time for virus inactivation. In short, Montana DEQ deems wells of this nature very susceptible to contamination. Additionally, the very shallow, alluvial nature of the existing wells mean that the well sources could be tied to surface water. If so, surface water treatment requirements could also be necessary. These substantial design requirements must be thoroughly evaluated.
- Wastewater. The HLL proposal does not adequately address wastewater disposal. The installation of sewer collection piping and septic tanks touches only the surface of what will be needed to support this expansion. The current HLL lagoon and land application (spray irrigation disposal), located on the west side of Highway 83, were never designed for the proposed wastewater volumes. Additionally, the design standards for such disposal methods (MT Circular DEQ-2 Design Standards) have changed substantially since the time of original design. The effluent treatment, application rates at agronomic rates, setback distances and requirement for harvest of the crop receiving land application will require complete re-design. Finally, the entire volume of wastewater collected during the proposed winter operation must be held in the lagoon until the land application vegetation comes out of dormancy late in the spring. Again, this change in HLL operations will require substantial lagoon holding volumes. Both the lagoon and the spray irrigation area will require full reconstruction. Detailed design will be needed to assess the additional acreage needed for this expansion. Environmental review and engineering design must be completed to convey to the public how much additional land resource will be allotted to this HLL expansion. The current scoping documents are inadequate to determine if the allotted wastewater area in the project permit area is adequate. Much deeper evaluation is needed.
- Wildlife Impacts. I lack wildlife management background. However, I have worked with utility managers in national park settings. From that experience, we have seen that bears are often attracted to improperly handled solid waste, wastewater lagoons and effluent spray areas. This expansion will only expand that potential nuisance and bring bears near the highway. Wildlife managers surely must evaluate this interaction, along with many other impacts to wildlife.

Finally, land managers must recognize that the diverse, existing group of users of the Holland Lake area have maintained a delicate balance. Day hikers, picnic-ers, campers, horse-riders, wilderness outfitters, in-holding lake homes and existing HLL patrons have utilized this resource area in a manner that as maintained a rustic, natural experience. In maintaining this experience, the users have been “light” on the land. This approach has been respectful of the other users, and along the way, has required minimal natural resources. Water use is minimal. Wastewater disposal is minimal. Solid waste is packed in/out. A quiet experience has been maintained. When out-of-state developers propose major changes in land use to a relatively remote area like Holland Lake, they likely don’t appreciate the delicate balance that exists and will likely be upset. Once this balance is upset, the experience can never be returned to its original, nor can sustainable, resource uses be returned.

Land use managers must consider the enormity of their decision. Certainly, a thorough evaluation of impacts is the least that is warranted.

I would be happy to discuss my comments and sincere concerns for this project.

Sincerely,

Emily J. Gillespie, PE

Professional Engineer license #14424

Helena, MT

[emilyjeangillespie@gmail.com](mailto:emilyjeangillespie@gmail.com)