



Submitted electronically at: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61746>

October 7, 2022

Kurt Steele, Supervisor
Shelli Mavor, Project Leader
Flathead National Forest
Swan Lake Ranger District
200 Ranger Station Road
Big Fork, MT 59911

Re: **Additional Sierra Club Comment** on Holland Lake Lodge Facility Improvement and Expansion # 61746

Dear Supervisor Steele and Project Leader Mavor:

Thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Improvement and Expansion project. This comment letter from Sierra Club is in addition to the joint comments submitted by Sierra Club, Humane Society of the United States, and Humane Society Legislative Fund on October 4, 2022, and is specific to wastewater treatment and associated impacts to water quality from the proposed expansion.

The increase in human waste from higher occupancy (about 300% increase according the Holland Lake Lodge Master Development Plan (HLL MDP) document on the project webpage) of the proposed development would threaten the extraordinary water quality of Holland Lake and associated water bodies. Currently a lagoon with periodic land application is used to hold and “treat” wastewater from the existing facility. We note that the technical evaluation¹ on the project website found that the current lagoon used up to 73% of its capacity on one occasion in 2016. Yet, we see no concrete plan suggested to increase lagoon capacity to match the potential 300% increase in guest capacity. Instead there are vague assertions on page 15 of the HLL MDP that septic capacity or lagoon capacity will be enlarged “as needed” based on flow data and need. This suggests a “wait until an exceedance occurs” approach and the lagoons/septic tanks overflow before enlarging, rather than building the capacity prior to allowing 300% increased occupancy. This approach is insufficient to protect water quality. Therefore, we can expect significant water quality and fish habitat impacts that trigger the need for an environmental

¹ HLL_MDP_AppB_TechMemo_Wastewater_20211112.pdf

impact statement. Also, we can expect water quality violations, triggering the need for full environmental analysis and before-the-fact enhancement of wastewater system capacity.

The sole reference to treatment enhancement for this increased capacity is increased land application. There is no evaluation of whether there is capacity for this level of increase in land application within the watershed. Thus, there is risk that bacteria, viruses and nutrients may run off from the land application into Holland Lake or associated waterbodies, substantially degrading their high water quality. This also triggers the need for a better environmental analysis under National Environmental Policy Act regulations.

Finally, the holding capacity of the lagoons will be influenced by changes in precipitation expected in the next several decades. The Montana Climate Assessment² makes the following finding: “Across the state, precipitation is projected to increase in winter, spring and fall...” Thus, it is likely the Holland Lake area will receive higher precipitation, likely through extreme precipitation events (Touma et al 2022)³. Touma and others predicted the Pacific Northwest forests will see at least 3 extreme precipitation events within five years in post-fire areas, suggesting that the extreme rainfall events are likely throughout the Holland Lake region. Yet, the lagoon enlargement will only follow such extremes if it is deferred, allowing polluted water to significantly degrade Holland Lake and downstream waters.

As noted in our detailed comments previously submitted, Sierra Club opposes the proposed Holland Lake Lodge Facility Improvement and Expansion project. We also oppose the Flathead National Forest’s stated intention to permit the project through a categorical exclusion when a full Environmental Impact Statement on its impacts to water quality, wildlife habitat and wildlife including listed species should clearly be undertaken for a project of this magnitude.

Sincerely,



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Sierra Club
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cc: Leanne Marten, Regional Forester

² <https://montanaclimate.org/chapter/climate-change>

³ Danielle Touma, Samantha Stevenson, Daniel L. Swain, Deepti Singh, Dmitri A. Kalashnikov, Xingying Huang. Climate change increases risk of extreme rainfall following wildfire in the western United States. *Sci. Adv.*, 8 (13), eabm0320. • DOI: 10.1126/sciadv.abm0320.