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Organization:

Title:

Comments: Dear Flathead Forest Supervisor and Staff:

Thank you for the opportunity to respond to the proposed categorical exclusion and approval of a massive development proposal by altering the leasing of USFS lands for the Holland Lake Lodge area of the Flathead National Forest. I have stayed at the Holland Lake Lodge and camped at the Holland Lake campground in the past and continue to recreate in the Holland Lake area on its trails and waters.

I am very disappointed in the proposal to enlarge the Holland Lake Lodge operation. When I first moved to Missoula in the 1990's my family would regularly visit the Lodge, stay in its cabins and enjoy the meals offered in the restaurant. In fact, my younger daughter's first birthday was celebrated at the Holland Lake Lodge. Subsequently, the owners shifted to an "American Plan" basis for staying on the property that priced my family out of staying there. Now they want to gouge even more profit out of the lease at the expense of Montanans. It is likely the expansion will employ staff imported from elsewhere primarily, as has been the pattern in other large resort developments, again impacting Montanans with additional traffic, more noise and the other effects discussed below without providing much in return. Any conception that the lodge will benefit the Swan Valley in any real way is delusional. All that is promised is degradation of the area and the recreation experience.

The National Environmental Policy Act regulations provide in Title 40 as follows:

§ 6.204 Categorical exclusions and extraordinary circumstances.

(a) A proposed action may be categorically excluded if the action fits within a category of action that is eligible for exclusion and the proposed action does not involve any extraordinary circumstances.

And

(b) The Responsible Official must review actions eligible for categorical exclusion to determine whether any extraordinary circumstances are involved. Extraordinary circumstances are listed in paragraphs (b)(1) through (b)(10) of this section. (See 40 CFR 1508.4.)

(1) The proposed action is known or expected to have potentially significant environmental impacts on the quality of the human environment either individually or cumulatively over time...

(3) The proposed action is known or expected to significantly affect federally listed threatened or endangered species or their critical habitat...

(5) The proposed action is known or expected to significantly affect environmentally important natural resource areas such as wetlands, floodplains, significant agricultural lands, aquifer recharge zones, coastal zones, barrier islands, wild and scenic rivers, and significant fish or wildlife habitat...

The proposed development would significantly increase the presence of humans (up to 3x current capacity even without additional staff being accounted for- Master Development Plan), mostly tourists with less bear awareness and understanding, thereby displacing bears, resulting in higher human encounters and the risks associated with those encounters, and produce more waste to be handled in a high bear activity zone within established grizzly bear management units under the Grizzly Bear Recovery Plan and the Primary Conservation Area delineated by the most recent Northern Continental Divide Ecosystem (NCDE) Conservation Strategy. Thus, the proposal will result in more grizzly management conflicts and likely more dead bears. As a listed threatened species under the Endangered Species Act, such effects trigger a finding of extraordinary circumstances, requiring full NEPA analysis well beyond a categorical exclusion. We request a full Environmental Impact Statement be prepared to examine the proposal in light of the expected impacts on grizzly bears and their habitat.

With higher guest capacity there also will come more traffic in the area on Hwy 83 and forest roads servicing the

lodge. This will increase the potential for wildlife collisions, that may include listed grizzly bears. Thus, the lodge's footprint will expand well beyond the site and negatively impact connectivity between the Mission Mountains and the Swan Range/Bob Marshall Wilderness core grizzly habitat. None of this has apparently been taken into account or analyzed adequately under NEPA.

In addition, the increase in human waste from higher occupancy 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. Note that the technical evaluation on the project website (HLL\_MDP\_AppB\_TechMemo\_Wastewater\_20211112.pdf) 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 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 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 runoff 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 the above sections of the NEPA regulations.

Finally, the holding capacity of the lagoons will be influenced by changes in precipitation expected in the next several decades. The Montana Climate Assessment (<https://montanacclimate.org/chapter/climate-change>) 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). Touma and others predicted the Pacific Northwest forests will see at least 3 extreme precipitation events within 5 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. Despite, these glaring deficiencies the permit implications for water quality have neither been analyzed nor adequately planned for.

I oppose this permit and request the preparation of a full environmental impact assessment for the proposed facility enhancement. Such an assessment is required to protect threatened species and water quality that will face significant impacts if the project is allowed to go ahead.

Signed,  
Len Broberg