

Please accept these comments, in addition to my initial comments made on September 15, 2022.

As a lifelong resident of Montana and a co-owner of a family cabin in the Condon area, I grew up recreating in, on and around Holland Lake, so like so many others, it has special importance and history for me.

After review of the Master Development Plan (MDP), the Water/Wastewater analysis (Appendix B) and the NRHP DOE analysis (Appendix C) I have the following additional concerns:

Water/Wastewater

Per the Sewer System Assessment done in 2021 by the WGM group, the data available suggests that the wastewater system has not been utilized to its full capacity between 2016-2021. There are issues with these assumptions as the data is questionable and incomplete; the report recommends as the highest priority to upgrade flow meters and collect more data. Was this recommendation taken, if so, was the additional data analyzed? I would ask that this be disclosed, but I doubt if any updated flow monitors were installed or data analyzed as that is what they say they WILL do in the MDP.

Another concern with the analysis is that 2 of the 6 years of data analyzed happened during the COVID pandemic which also clearly is not representative of a normal operating season for the Lodge.

Because the issues and concerns with the data, the assessment cannot accurately say if the current system is adequate for any kind of expansion. It does state that based on their estimates it may be adequate for a total of 82 people (guests and employees) during the summer months.

The assessment clearly states that the system is NOT adequate for the goal of the Lodges winter operations which would be at 50% occupancy as there is not room in the holding pond until weather is adequate for irrigation.

Which brings us to how the Wastewater system was addressed in the Master Development Plan. The MDP suggests that based on the flow data, which is inadequate and incomplete, the current wastewater system is sufficient with minor modifications.

They go on to say that the Lodge will take over management and maintenance of the entire wastewater system, which services the campground as well. They will add this 4-acre area to their permit and charge the Forest Service based on flow data for the campground's use of the system. They will install updated flow meters and only perform recommendations from the assessment based on flow and need, as determined, I suppose by them.

I am very concerned about this; it seems that this system is a huge investment by the Forest Service (and taxpayers) and to just have it become part of the Lodge's permit through an agreement is wrong and potentially illegal. I feel the Forest Service should maintain control of the system, and charge the Lodge for any upgrades related to expansion and well as invoicing based on the Lodges usage.

Water system: Because the current water system is defined as a Public Water System (PWS), the Lodges proposal to get around the exempt status is to develop 2 new PWSs that each serve 50% of the overall demand. What does that mean, this should be further analyzed with respect to the aquifer and the legality. There could be significant impacts to the water table and water quality.

Viewshed

The proposed expansion will severely impact the views for users on the lake and lakeshore. This is in complete opposition to how the cabin owners and campers on the other sides of the lake are treated with respect to views. The MDP says the Lodge's goal with landscaping is to maintain a semi-natural native forest. They plan to thin, remove, and prune trees to improve their views. The massive new 13000 sq ft, two story lodge, as well as many of the new cabins are

proposed to sit right on the lakeshore within plain view of lake users, residents, and campers. The view from water in the MDP is unacceptable and will completely change the current natural looking forest when viewed from the lake and lakeshore currently. Everything about the expansion proposal is excessive, and not at all in line with the Forest Plan Management Area for this type of recreational site in a rural setting. There will be significant impacts to the viewshed as well as a significant increase in light and noise pollution.

The floating docks are unnecessary, unacceptable, unnatural, ugly, and would cause loon, fish, and other wildlife disturbance.

Capacity and Footprint

Current capacity according to the MDP is 50 guests and 12 employees. Current combined square footage of ALL buildings is 10,990 sq ft. Current number of buildings is 14. Proposed capacity is 156 guests and 17 employees (173 total guests and employees-based on employee RV parking and lodging). Proposed combined square footage of all new and remaining buildings is approximately 38,800 sq ft with 35 total buildings (32 new construction). Interesting to me that in the MDP the Lodge admits that the proposal is approximately three times the visitor volume but not significantly more than detailed in the 1935 Site Plan (82 guests) and the 1979 MDP (100 guests). On this small tract, I would say doubling visitor volume in this rural setting is significant.

Historic Values

After reviewing the Determination of Eligibility for the National Register of Historic Places requested by Wohlfeil and completed in 2020, I have the following comments and concerns.

The result of that determination is a recommendation that the whole property be eligible for a listing in the National Register of Historic Places (NRHP) as a historic district. The determination also recommended that the Lodge building be individually eligible for inclusion in the NRHP. The NRHP represents the Nation's official list of properties considered worthy of preservation. The National Register recognizes five categories of properties: buildings, structures, sites, objects, and districts. The Holland Lake Lodge Property retains integrity of location, design, setting, materials, feeling, and association. The property will no longer be eligible for this listing if the proposed expansion goes through.

Additionally, it is the responsibility of the Forest Service to manage and preserve historic properties under Federal Jurisdiction, as directed by the National Historic Preservation Act of 1966. Forest Service officials are required to identify, evaluate, and plan for potential effects and to avoid, minimize, or mitigate adverse impacts to historic properties located on Federal lands. There is a process the Forest Service must follow to consider the potential impacts of proposed projects on historic properties. This process involves consultation with the State Historic Preservation Office (SHPO), Native American Tribes, and other interested parties (like the Upper Swan Valley Historical Society).

Hopefully Flathead National Forest officials are aware of their manual direction and are planning to fulfill their responsibility before considering approving a project that will destroy a historical property which has been recommended for inclusion in the NRHP as a historic district. There will be significant impacts to the historic property and mitigation by curating old photographs of the lodge displayed in guest rooms and providing visitors with historic information is not enough.

Winter Use

The MDP anticipates operating in a winter season, approximately mid-November through mid-January. As already noted, the wastewater system could not support full occupancy. If the fix is to construct another holding pond or enlarge the present one, that is a significant impact to the environment.

Additionally winter use will negatively impact solitude in the area, and potentially significantly impact Canada Lynx if cross-country skiing trails in the area are packed down by continued use.

In closing

The MDP the Lodge requests a categorical exclusion (CE). Again, the Forest Service is required to follow a process and cannot just categorically exclude a project because the Lodge requests it. If a project has the potential for significant impacts to the environment, a CE cannot be used. One of the ways the Forest Service can use a CE is if they have studied the action in a previous environment assessment, found no significant impact and validated it after that project was completed. I really doubt if that has been done, but if so, why hasn't the Forest Service been transparent and shared this previous EA of like project with the public?

According the MDP a feasibility study was completed in 2021 and concluded that no substantive Recognized Environmental Conditions (RECs) exist at Holland Lake Lodge. Why wasn't this study included as an appendix to the MDP?

The proposed project plan more than triples the current capacity and footprint. That, and all the other issues with water, wastewater, viewshed, removal of trees and vegetation, potential for TES and other species disturbance, construction of new trails and parking lots, deconstruction of buildings, proximity to Wilderness, and a substantial increase in use across a longer time period screams ENVIRONMENTAL IMPACT! It is significant enough to warrant a full EIS and an Environmental Assessment will show this if done properly.

Thank you for your consideration and addressing of these concerns.

Ruth Roberson Lang