

RE: Holland Lake Lodge Expansion Proposal Comments

I am opposed to the current process underway for the proposed Holland Lake Lodge (HLL) expansion and development by the POWDR Corporation, working in conjunction with Christian Wolfheil, the current leaseholder.

There are a significant number of factors operating in this environment that would preclude a Categorical Exclusion (CE) being invoked by the United States Forest Service (USFS) under the NEPA (National Environmental Policy Act)¹. The CE is defined in the NEPA as to how it can be utilized², and it seems likely that the current proposal does not fit the guidelines under which the CE can be considered. Some of these factors are (in no particular order of importance):

- The modification, destruction or reducing in value of historical structures and areas under the National Historic Preservation Act, Section 106³, which assessment has not yet been performed, and which would likely indicate an adverse effect finding.
- The uncertainty that the current wastewater treatment system can be adequately modified or upgraded to handle the significantly increased loading.⁴ There is no confidence that the current or upgraded facility will be sufficient, and a tangible threat of eutrophication of the lake by excessive phosphorus cycling.^{5,6}
- Potential damage to the groundwater⁷ and soil⁸ ecosystems from the above-mentioned wastewater system in the event of acute or chronic failures or inefficiency of the system.
- Degradation of the qualitative enjoyment and benefits to those visiting the lake outside the immediate HLL area caused by visual pollution, and potential real damage resulting from exclusion from the HLL area, including the lakefront and associated public lands.

¹ National Environmental Policy Act”, from the United States Environmental Protection Agency website <https://www.epa.gov/nepa/> .

² “National Environmental Policy Act (NEPA) Compliance”, from the Federal Register website <https://www.federalregister.gov/documents/2020/11/19/2020-25465/national-environmental-policy-act-nepa-compliance> .

³ “Section 106: National Historic Preservation Act of 1966”, from the United States General Services Administration website <https://www.gsa.gov/real-estate/historic-preservation/historic-preservation-policy-tools/legislation-policy-and-reports/section-106-national-historic-preservation-act-of-1966#:~:text=Section%20106%20of%20the%20NHPA,when%20making%20final%20project%20decisions.> .

⁴ “Sewer System Assessment – Holland Lake Lodge”, in a technical memorandum from the WGM Group to Brian Stewart, dated October 11, 2021.

⁵ Yang XE, Wu X, Hao HL, He ZL. Mechanisms and assessment of water eutrophication. J Zhejiang Univ Sci B. 2008 Mar;9(3):197-209

⁶ Nutrient Pollution, from the United States Environmental Protection Agency website <https://www.epa.gov/nutrientpollution> .

⁷ Laura E. Hubbard et al., “Understanding the Hydrologic Impacts of Wastewater Treatment Plant Discharge to Shallow Groundwater: Before and after Plant Shutdown,” *Environmental Science: Water Research & Technology* 2 (2016): 864–74.

⁸ Khalid S, Shahid M; Natasha, Bibi I, Sarwar T, Shah AH, Niazi NK. A Review of Environmental Contamination and Health Risk Assessment of Wastewater Use for Crop Irrigation with a Focus on Low and High-Income Countries. Int J Environ Res Public Health. 2018 May 1;15(5):895.

- Potentially adverse effects to wildlife species which use the area, including several that are endangered or threatened.⁹

In addition, there is an intangible threat to the area from a future expansion or activity in and around the HLL from subsequent lease undertakings from POWDR Corporation, since it is likely, given its history and corporate mission, to expand its recreational and commercial footprint outside the current lease area.

I urge the USFS to conduct a complete EIS (including groundwater, hydrology, soil chemistry projection and wildlife impact), Section 106 assessment, and commercial legal review on the project, including a determination of the legal standing of the POWDR Corporation to enter into a lease agreement or a joint venture with the leaseholder.

While I am not at all opposed to reasonable upgrading and renovation of HLL, since by all accounts it is in need of it, and would benefit both the public at large, and the leaseholder, and while I am also not opposed to commercial corporations and individuals seeking to benefit financially while offering public accommodation in recreational environments, this proposed development appears to have too many overtly or potentially long term negative effects to be seriously considered as written.

I would likely support a proposal that offered a scaled down redevelopment (reduced footprint and occupancy capacity), preserved the intrinsic beauty and experience of the lodge area, did not negatively affect the groundwater, lake water or soil, and minimized the environmental effects (noise, light and traffic) on wildlife. I suggest as well a contractual agreement with the USFS and POWDR that restricted future activities to only the current lease acreage, and prohibited POWDR (and its successors and assigns!) from proposing, offering, applying for, or cooperating in any activities in adjacent or nearby areas.

Respectfully submitted,

John H. Hallman, Ph.D.
Condon, Montana

⁹ "Threatened, Endangered, Proposed, and Candidate Species in Montana", from the United States Fish and Wildlife Services website <https://www.fws.gov/office/montana-ecological-services/species> .