

Comments on Proposed Holland Lake Lodge Expansion – September 29, 2022 – Mark Benedict

To: U.S.F.S. Flathead NF, POWDR Corp., & Holland Lake Lodge, Inc.

While I support the project goals of updating Holland Lake Lodge to meet environmental health and human safety objectives, the proposal described in your Master Development Plan (MDP) and Scoping documents lacks adequate attention to potential environmental impacts as follows:

1. The **scale** of the expansion is stated to be changed to about 3 times the current visitor capacity. Extended seasonal operation adds another multiplier (1.5x, 2x ?) as does the expanded day use capacity (restaurant/meeting services) so the potential environmental impacts are proportionally multiplied (4-6 times?).
2. Upgrading/expansion of the Wastewater Treatment system was not presented at the first Public Meeting I attended at the lodge. Are there groundwater monitoring wells and a leak detection system for the existing waste treatment system and what is the current WWT facility's compliance history? How will you train/educate visitors about the vulnerabilities of biological WWT systems to many chemical products that they may bring to your facility? The MDP states that the distance to groundwater is only 10 feet. Are Holland Lake and the current two water wells hydrologically connected? Where is the water quality test data for Holland Lake and for your two existing wells?
3. USFS is the responsible (lead) agency but does not have expertise in evaluating potential WQ, WWT system, hydrogeology, air quality, noise & light pollution, or fish & wildlife impacts. Other agencies need to be involved in evaluating this proposal and alternative (downscaled) proposals need to be developed by the proponents and then studied & reviewed. The involvement of other agencies only for "permission" is not adequate.
4. What is the impact to local trails and hiking destinations from this proposal?
5. The proposed increase in scale of the facility will necessitate reconstruction & (likely) paving of the access roads. Who is intended to pay for that? Are Missoula County and/or federal taxpayers to subsidize this corporate recreation facility expansion?
6. Regarding "recreation load demand" and its associated impacts, it is not the responsibility of the local community to bear the burden of off-scale outlander visitations. The Swan Valley is environmentally sensitive and has biophysical limits like any other ecosystem. I'm sure upgrades to the existing Holland Lake Lodge are warranted but they must be appropriately scaled to restore/retain the environmental quality & near wilderness characteristics of the Swan Valley environment.
7. POWDR's "play forever...adventure lifestyle" mission is not necessarily the mission of the Swan Valley Community. In this valley we share the mountain forest with many rare species that have lived here for many thousands of years. They were here BEFORE us and their right to life preempts any human development proposal.

8. The desire by the USFS to fast-track this proposal using “categorical exclusion” is very arrogant. The USFS not only needs to learn to practice sustainable forestry but also needs to refrain from being a corporate agent with regard to recreation development proposals. Flathead NF does not belong to the USFS, you only administer the *sustainable* management of it.

9. The shoreline protection buffer of 20 feet is inadequate to protect the shoreline and water quality of Holland Lake, especially in the event of accidental releases of pollutants (spills for example). Please refer to Washington State’s Shoreline Master Program Handbook (Chapter 11): Vegetation Conservation, Buffers and Setbacks: <https://apps.ecology.wa.gov/publications/parts/1106010part11.pdf> for guidance. While Montana’s shorelines regulations may not require a higher level of protection the science behind stricter standards is well-established.

10. On page 15 of the MDP you briefly discuss plans for two new water supply wells. It sounds to me like your plan is designed to avoid regulation as a “community public water system”. Is this in the best interests of the community and your visitors?

11. Page 16 (#6) appears to propose a “wet well”. Please elaborate on that term. As the distance to groundwater is only 10 feet, your entire WWT system will need to be failsafe in order to prevent contamination of groundwater and Holland Lake.

12. Page 16 (#9) mentions the lagoon liner. Is it only single-lined and how do you currently assess the condition of that liner?

13. While you continue your work on this proposal I encourage you to contact (and visit) Sleeping Lady Resort in Leavenworth, WA to benefit from their design, development, and operational experiences: <https://www.sleepinglady.com/>

Sincerely,

Mark Benedict

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