Mr. Steele,

I have been enjoying Holland Lake since I was at college at the University of Montana. I would come to camp by myself for respite from the fast-paced college life. Over the past 35 years I have watched as this lake became more popular. I know people come here for the peaceful, natural landscape. Those that come take care of the space and do not create or leave a large footprint.

The developers proposing the expansion of the HLL talk of what a special place this is and how they intend to preserve the spirit and integrity of the lake. I agree it is special yet I think the plan will only negatively impact the spirit of Holland Lake. This expansion creates a LARGE and unnecessary footprint.

**Process**

Thank you for extending the public comment period on the HLL Master Development Plan. The first deadline was much too short for this level of change. I the find the timing t of release of this Master Development plan not only insulting - it appears devious. It was submitted to the USFS and dated April 15, 2022. Why did the developers and Forest Service decide to wait to release a public notice revealing these plans until early September? Notice should have been provided when those impacted could become aware of plans at the beginning of summer, rather than once the summer is ending. Now, so many of the campers that enjoy this lake year after year may not be aware of these changes and therefore effectively removed from the comment period. It seems the intent was to slide this under the radar so those people passionate about this place were NOT made aware of plans until it was too late.

**Use**

I would argue that Holland Lake should NOT be considered a Focused Recreational Management area as described in the master plan. Holland Lake is much different. It is a small lake, 431 acres, tucked away in a rural area away from other commercial development. This development cannot be compared to Recreational Management areas suggested in the Forest Service Plan that support a LARGE lake developments (like on Flathead Lake) and ski areas (such as Big Mountain/Whitefish Mountain). The plan goes on to say that development is intended to benefit local economies by having robust recreational settings. I am sorry, but **robust** does not fit, or begin to describe, the rural Swan Valley, or is it needed. Most people come here to escape that sort of thing.

This development does not meet the needs of Montanans. I believe many Montanans will be priced out of this proposed development. Powdr has been pushing expansion of their fiefdom across the U.S. which id contrary to public desires only to provide Powdr with greater profits. Yet, many of the lands they are developing are not theirs but lands managed for public use and owned by the public.

The Missoula County Swan Valley-Condon Comprehensive Plan (1996) states in its introduction that the residents’ primary objective is to retain the rural and wild character of the valley. To accomplish this residential development should not exceed a rural density (one unit for five acres and in many cases one unit per forty acres). The density of the proposal is nearly five units on each acre, or over four times the current plan’s recommended maximum development density. I recognize that this proposal is not on private lands yet it is a private money-making development and should be respectful of citizens adopted development goals for the valley. For commercial development, the Plan’s goals are for development to be aesthetic, at an appropriate scale, in an appropriate area, maintain important open space, and maintain scenic views. While these goals could be interpreted in various ways the USFS should listen to the people’s comments to determine if this proposal is in sync with the valley’s goals.

I understand that some modifications need to be done on the property but this development plan must be scaled back. The density of proposed lodging needs to be reduced significantly and designed to be more compatible with other valley densities. Any development needs to be compatible with the open space feel of the valley and not packed to create a visual blight.

**Historic Values**

It is commendable that the applicants recognize the historic value of the existing development. Maintaining historic structures is never easy and anyone that values their character must be prepared to go the extra steps to maintain their integrity. This should have been done under the present ownership. Dilapidation due to negligence is not a reason to give up on structures, tear them done and start over. It is still possible to retain the existing structures. I believe the Holland Lake Lodge might be eligible for the National Register of Historic Places. The building that currently serves as the guest check-in office also may be historic and should be saved. I believe a full assessment of the historical values should be conducted prior to any changes. Those with historical significance should be preserved. People have been coming to this lodge for decades because of its unique historic qualities.

The portion of the Flathead Management Plan quoted in the proposal mentions that the plan intends to accommodate existing as well as additional recreational growth. What guidelines are in the plan concerning recognition and maintenance of historical use and structures being preserved? These concerns should come in the forefront of planning gross changes in an established historical area before planning more impacts.

What about historical use of the area by native Americans? The Pond d’Oreille and Salish/Kootenai tribes have had a historical presence in the area. Have they been made aware of these plans? Do they have concerns?

**Infrastructure**

I question whether the existing infrastructure can accept this level of development. For instance, Montana Highway 83 provides access to Holland Lake Road. It does not get priority in the area for winter snow plowing. Holland Lake Road itself is taken care of by the county. At the present time I don't believe it gets a high priority for winter maintenance either. I also wonder if Holland Lake Road currently meets county standards to accommodate the amount of traffic generated by this proposed development. The unpaved Forest Service road that serves the campground and HLL currently is very dusty. Increased traffic created by a HLL expansion will have a negative impact on this road both structurally and by creating massive dust. More traffic down the road and the initial use of large construction-type equipment will affect the air quality in the area and may add sediments to the lake.

I wonder if the developers have considered the drain this could place on the local electrical grid. Are these developers aware that several times a year the power goes out due to windstorms or snow load downing the electrical lines? The noise pollution is bad enough when a couple of RVers in the campground run generators. I cannot imagine how many generators it will take to provide electricity to this massive development during a power outage..

I question why the USFS would have a private entity control the wastewater generated by several forest service lands, including the present and any future lodge, in a nearby lagoon area. Is this legal, safe, and best practice to maintain the waste? I would hate to have this fail and impact Holland Lake’s water quality. I understand that bears have destroyed the fencing at times around the present lagoon. Who will monitor this site on a regular basis? I believe the USFS should monitor this and not leave it to a private company.

**Impacts**

**Water Quality**

Maintaining the water quality of Holland Lake is critical. The quality of lake water is necessary for the local Bull Trout population to thrive. The proposed HHL expansion will add sediment to the lake during construction and proposed increase in use. Removal of trees near the lakeshore only adds to sediment runoff from the development into the lake. The proposed lodge and cabins, and the accompanying foot traffic compacting the soils, will add impervious surfaces that cannot absorb water and accelerate the flow of undesirable contaminants into the lake water. The cabins and a lodge must have a considerable set back from the lakeshore and priority given to maintaining the lakeshore trees. Lodging could easily be repositioned on the site not so close to the lakeshore. The current lodge improvements and other leaseholder cabins have established a more acceptable setback from the lake and new development should follow this example.

**Wildlife**

**Bears:**  Protecting the threatened Grizzly Bear has not been adequately addressed by these development plans. Are the developers aware that this land is identified in the grizzly linkage zone plan as a critical link between the Swan and Mission mountain ranges. Current lodge management and the proposed development plan diminishes the significance of this great bear in their proposal. Just because management has not seen grizzly bears in the area is not because they are not present. The time current managers have been there on a regular basis (when the lodge is open) has only been during the busy summer season when bears are generally higher in the mountains. I have seen five grizzlies in this area and numerous black bears. I do not want a mega development such as this proposal to displace them. A detailed and complete review of the impacts to the grizzly must be completed.

**Bull Trout:** The threatened Bull Trout also inhabits Holland Lake. I fail to understand how so many trees could be proposed for cutting near the lakeshore to accommodate the proposed development. I believe the Forest Service will not allow removal of trees within a certain distance of a lakeshore where bull trout are present (300 feet?). Why would the Forest Service allow such a massive amount of tree removal for this development contrary to what private individuals and the Forest Service themselves cannot do?

**Loons:** Loons have only been present at Holland Lake for the last four to five years. They are a special addition to this lake and are enjoyed by visitors. While the current development proposal says they will not promote motorized boat traffic on the lake, they will encourage more traffic on the lake. Tripling of rentable units will certainly add many more people on the lake in canoes, kayaks, and paddleboards and place stress on this species of special concern. I am worried that adding this amount of lake traffic may displace the loons that have been such a wonderful addition to the Holland Lake ecosystem.

**Lynx:** Similar to the Grizzly Bear, the threatened lynx inhabits this area. Again, further studies should be completed about the impacts this development will have on this threatened species.

**Other wildlife:** Many other bird and wildlife species reside in this area. I have heard the wolves, owls, and pileated woodpeckers many times and appreciate their presence. I have also witnessed numerous mountain lions in the area. These species also need to be addressed by this proposal.

**Recreation**

Are carrying capacity studies completed on the amount of recreation an area can support? I am concerned that the carrying capacity may be exceeded on the lake with this influx of people. I am also concerned that popular trails and the roads that access these trails in the area could be negatively impacted. Part of the experience of being on a trail is to be out on your own enjoying nature and not having a stream of people passing by. The HoIland Lake falls trail is special to so many people. The experience of standing at the falls and looking out over the picturesque lake and Mission Mountains to the west will be lost by the interruption of a large development including the lodge, cabins, and massive parking areas.

The use of swim docks should not be allowed. This only encourages large groups to gather in the lake itself impacting the recreational enjoyment of other non-lodge lake users. If they are permitted, they need to be close to the shore to not encroach on the experience of others.

**Visual**

Visual impacts are of great concern to me. The current lodge and cabins are minor intrusions onto the lakeshore. The current proposal places much of the new development right up to the lakeshore. This encroachment onto the shoreline takes away from the experience for ALL that use Holland Lake. If any part of this development is approved, any new structures must be pushed back from the lake so it is less obtrusive to the rest of the lake users. Existing trees need to be kept providing an aesthetic view around the lake and to protect the lakeshore. The developer should use the large pasture already devoid of trees to place lodging facilities and parking spaces before cutting more trees. Existing campgrounds and cabins were set back intentionally many years ago so they would barely be visible and less intrusive along the shoreline. These setbacks create a pleasant viewshed and experience while recreating on the lake while also protecting the lakeshore. The lodge and its accompanying buildings must be held to this same standard.

Lights from this development are also a big concern. No matter to what the degree lights are designed to be less intrusive they are still lights. The people at the campground and those at the cabins are there to be away from massive artificial light. This development could appear to be a little city amid a forest experience.

Will the addition of so many lights impact the habits of nocturnal species? Will bats still fly around the lake in the evening helping with the local mosquito population? Will the lights confuse migratory species habits?

**Noise**

The noise generated from the lodge is already a problem. Large gatherings such as weddings have played loud music. This noise is amplified as it bounces off nearby mountains. Quiet hours have not been observed by the lodge management in the past and I wonder if any new development will adhere to this rule. The Forest Service is too removed from this area to enforce the quiet hours. I am afraid quiet hours will continue to be abused upsetting the experience of other lake users. Another part of the proposal is that they plan to have music at the restaurant and maybe out on the patio. Again this adds more noise on the lake that is not consistent with the rural peaceful lake environment. People come to this NOW quiet lake to enjoy a pleasant outdoor experience. They do not want to be bombarded by loud music and excessive noise.

It is not only the disruptive noise created by gatherings but the added noise from traffic, people, and facilities. Do they plan to have air conditioners in the lodge, restaurant and cabins? Collectively these units can add noise in the area. In the event of a loss of power excessive noise might be caused by increased use of generators to operate the facility.

Noise could also have a big impact on the areas wildlife.

**Safety**

I wonder if these developers have considered the safety of its customers. Highway 83 can be a dangerous highway. Deer are prevalent on this highway and many are hit by cars. This development only adds traffic to the area with people unfamiliar with road conditions and additional accidents are highly probable. On Holland Lake Road users must watch for Longhorns standing in the roadway from the nearby Forest service leased land. This adds another hazard. Just this summer alone I have witnessed these Longhorns on the road outside their fenced lease at least a dozen times.

Has the Condon/Swan Valley Quick Response Unit (QRU) been contacted about this proposed expansion? The QRU is staffed by wonderful volunteers that provide a great service in the valley with limited resources. Adding a large population to this area could strain their ability to help those in need. If Life Flight Is called, is there a designated landing area to pick up patients?

Forest fires area a major threat in this wooded area. A substantial portion of forest fires are human caused. Is adding more people in a condensed area advisable? There is only one road out to evacuate a large concentration of people. How will this potential hazard be addressed?

**Economy**

It is important to listen to the public's desires for this pristine lake. What is proposed for this site will degrade what people love about this area. The Condon/Swan Valley area does not need a boost to the economy. I have talked with many local residents and they like that not many amenities are available in close proximity. If any amenities are desired they would be ones needed by residents and certainly are not a resort facility that only caters to people coming to vacation. The Swan Valley- Condon Comprehensive Plan states that commercial structures should enhance existing rural and wild valley character and be SMALL in terms of scale. I do not consider this a small commercial development given the present characteristics of the valley.

Commercial developments in the area can barely find enough workers to run their current operations. The development will likely need to bring employees to the site. There are few valley facilities that could provide for the needs of a part-time or seasonal staff. Laundry, banking, and entertainment options (other than outdoor recreation) are either minimal or non-existent nearby.

The type of people that will pay to come to a development as proposed will want more amenities nearby that are currently not present. For example, skiers at local ski areas like to explore the facilities in nearby towns such as going out for dinner or shopping for souvenirs. The Swan Valley area does not provide these types of added amenities.

**Summary**

Many of my concerns have surely been already brought up. The United States Forest Service is trying to consider this project under a categorical exclusion. I would argue that this project, tripling the use on this site, does not qualify for a brief review, or a categorical exclusion in such an environmentally sensitive area. A full environmental impact statement must be done.

Having large gatherings not allowed by local mandates, not following local rules, discouraging the local community from visiting, and allowing deterioration of the historic buildings does not set a good precedence for further development. It is apparent that this development is about money at the expense of the surrounding environment. The proposed plan must be amended for it to respect the area, its natural environment, and the home of so many critical wildlife.

At a minimum, this proposal needs to be scaled back significantly and the public’s concerns addressed. I have read many suggestions of other ways/uses that could preserve this land and would not have such a big impact. Alternative options need to be explored.

The people own this public land. The USFS is charged with caring for our collective public lands. Please do not bow down to a few with money over the interests of the majority. Overwhelmingly the public has spoken. They have asked for a more careful review to evaluate the impacts of this proposal. As a public agency the USFS needs to abide by the public’s request.