

Please see the attached document as part of my amended comments. **The proposed Master Development Plan submitted by POWDR is fully inadequate in details and has significant inaccuracies that make it both misleading and impossible for the U.S. Forest Service or the Public to consider or accurately review.**

I have many concerns about the impacts of the project and the appropriateness of the development process to date. Others with more expertise in Forest Service Process and Environmental concerns have provided comments specific to those areas as well as to the specific legalities of the proposed approval process. The primary concern I will address here is with the accuracy of the proposed Master Development Plan Submitted April 15th by POWDR Corp and Holland Lake Lodge Inc. (HLL) with Quality Assurance provided by WGM. The following comments are outlined in parallel numbering to that proposed Master Development Plan.

This information that both the U.S. Forest Service and the Public use to assess the proposed change of use should be accurate. Because I have only had had three weeks to research and address information in this project, I will state this is an incomplete list with some best guess approximations. I also have at least four current specific requests for information that are now entered as FOIA requests with the Northern Region Coordinator that have not yet been responded to (even though several of them are as simple as hitting send on an email).

Specific Items – Section Numbers (3.0, etc.) Correspond to the numbering in the proposed Master Development Plan:

3.0 Site Conditions

The first sentence of this section states the permit area is a 15-acre recreational area. **This sentence is factually incorrect. A simple examination of the current Special Use Permit (SUP) reveals that the permit is 10.53 acres. The 15-acre number is in the application and has been repeatedly parroted to the public to create an untrue narrative. 15 acres exists nowhere. The applicant is apparently proposing to increase the area under the lease to 19.38 acres. The lakefront area is proposed to increase to 14.16 acres. This is documented on the Proposed Permit Area provided by WGM dated April 11, 2022. The proposed application should be rejected based on this factual misstatement alone. The incorrect current acreage has been repeated to the Public for 34 of the 37-day comment period.** WGM is listed to have provided Quality Assurance to this document. Multiple requests were made for clarifying information. The fact this error took until the public meeting of October 4th in Condon to be disclosed is inexplicable.

3.2 Historic Site Conditions

The proposed Master Development plan states “A 1935 site plan depicts an 18-guest lakefront lodge and 16 cabins, accommodating up to 82 guests (see Figure 1)”. Although this statement is partially accurate, it is also deceptive. Specifically, viewing the plan viewed in person shows the following:

1. The 1935 site plan map states 7.95 acres. The corresponding SUP stated 4.95 acres. Both are substantially smaller than the current SUP.
2. Cabins 7-16 are shown dashed, indicating not constructed. There is no indication any were built.

3. The 82 guests would be reached by calculating that each cabin could sleep 4 people. Based on scaled size, these are similar in size to the current cabins and proposed “bunkies” that are intended to sleep 2 people (less than 300 sq ft). It takes a very advantageous assumption to get to this capacity and then compare to proposed occupancy.

The Historic Site Conditions section of the proposed Master Development Plan then briefly describes the lodge burning and being rebuilt 1947 – 1950 and then directly skips to 1979. This conveniently leaves out the following maps recorded between 1950 and 1979:

1. A 1951 SUP map that shows only 4 cabins with dashed trail to potential future sites for an additional 9(?) sites. This map encompasses only 4.95 acres. The corresponding SUP further states that the SUP is for 4.95 acres.
2. A 1961 SUP map that shows the same extents as the 1990 map referenced in the current 2017 SUP. These maps encompass 10.53 acres and show current cabins plus 5 “Prop” cabins which I interpreted as “proposed.”

The Historic Site Conditions section of the proposed Master Development Plan then refers to the history from 1979 to 1992 and notes the lodge and five cabins. Again, there seems to be a very relevant piece of documented history:

1. There is a 1990 map. This is the map referenced in the current 2017 SUP. The 1990 map notes that it is a redraw of the 1961 map. It shows the current structures, plus one additional trailer past Cabin #4.

I viewed and documented these maps and historic SUPs in a one-hour visit to the Bigfork Ranger Station on September 29, 2022. Section 3.2, Historic Site Conditions, only mentions one of these documents. The proposed plan does not provide full context of how that document was utilized or its corresponding SUP. It does not mention the intermediate maps. **And it does not mention that there has been a documented boundary in place for 60 years (since 1961) establishing a 10.53-acre boundary.** It is hard to believe that in the multiyear process of developing this information and quality checking it that this information was not viewed and recorded. **The omission of accurate historic context in this section creates an inaccurate (and potentially deceptive) impression.**

3.2.2 Cabins

This section of the proposed Master Development plan notes 6 existing cabins (as does the HLL website), but Figure 2 in the corresponding section only shows 5 cabins. I am unclear as to which is correct. This is not a large point, but it demonstrates the poor quality of the document and creates a misperception of the lodge’s current occupancy.

More importantly, Figure 2 depicts a green line around the property. This is not specifically noted, but the green line creates the impression that this is the current SUP boundary. This is deceptive. This is **not the current SUP boundary** (see attached), but is rather the **Proposed Boundary**, and it would expand the SUP to include the lakefront to the east and the west.

3.2.5 Caretakers Home

The proposed Master Development plan notes that the caretaker's home was built in 2017. However, Missoula County records show that this home was constructed in 2009, which also matches job records. This is another example of the plan's lack of a simple quality check.

4.1 Operating Season

This section of the proposed Master Development plan describes a 6-month summer season and a 2-month winter season. It does not mention plans for shoulder seasons. In public meetings, POWDR representatives have discussed both four-season operation and "local discounts in the shoulder seasons." The proposed Master Development plan does not clearly lay out the operating season and anticipated occupancy and in fact **devotes only two sentences to the subject**. It is vague. The operating season directly impacts the number of user days, which then cumulatively affects every other impact this proposed expansion - the surrounding wildlife and environment, other area users, demands on county services, expansion requirements for the wastewater plant, the energy use environmental sustainability of the facility itself, etc. **The proposed operating season and planned occupancy should not be vague. This should be one of the most defined sections of the proposal! All other impacts cannot be accurately analyzed without understanding Operating Season and User Days! The proposal should be rejected based on this inadequate section alone.**

4.2 Guest Capacity

The Guest Capacity section of the proposed Master Development plan is vague. **User days and occupancy loads impact every other analysis**. A sentence that jumps out regarding the proposed occupancy is:

"This is approximately three times the current visitor volume but not significantly more than detailed in the 1935 Site Plan or proposed in Uhl's 1979 Master Development Plan"

This statement is misleading. As previously detailed in the History section, this sentence bases occupancy of the 1935 site plan at 4 persons per cabin (which is a stretch). And that occupancy estimate is based on 10 cabins that were never built. Using math, $82/156 = 52.6\%$. **Therefore, the maximum occupancy of the never built 1935 site plan is about half of the proposed new occupancy. The statement that it is "not significantly more" is factually incorrect.** I have not reviewed Uhl's 1979 Master Development Plan and so cannot comment on the accuracy of that comparison.

4.3 Proposed Site Plan

Although there are many issues with this section, I will primarily highlight one. **Because this is the section where HLL/POWDR/WGM are proposing a new Site Plan, this would be the appropriate section to note that they are proposing to develop a lakeside site that grows from 10.53 acres to 14.16 acres (34.4% increase) and to 19.38 acres (84% increase) overall under HLL control. This additional growth is not noted anywhere on the proposed site plan. This omission should be cause for rejecting the proposal.** None of the proposed Master Development plans' figures provided indicate that HLL and POWDR are requesting additional land to be incorporated or show the extent of the proposed expansion that now extends the SUP to the lakeshore (despite the fact that all historic maps appear to stop the SUP boundary 20'-25' from the shoreline) and extend its captured lakeshore to both the east and the west. These changes create a strongly "private" perception, along with the floating docks, of a private lake and private lakeshore. This is **Public land**.

One other item to note in this section is that the next-to-last cabin and last three bunkies, along with their associated trails and connectors to the “honeymoon” cabin, appear to be sited on wetlands (see attached pictures). Is the plan here to fill in the wetlands? On a recent site walk, there were numerous tracks and game trails through the grasses and mud along with significant areas of standing water.

4.5.2 Wastewater

This section is also vague. It states that WGM was hired to inspect and determine whether upgrades would be required. The technical memo noted in the proposed Master Development Plan was provided on the U.S. Forest Service site at a later date after request, but test reports required to be taken by the facility operator have not been provided. The technical memo provides no specifics on the defined need for expansion, and it is again obvious that any full analysis would be directly tied to **Operating Season** and **User Days**, which are undefined anywhere in the proposed Master Development Plan. Stitching the technical memo and this section together, it is reasonable to assume that when the facility is expanded and the season is expanded that the wastewater facility would be expanded. This also makes sense regarding the area shown for the expanded proposed boundary.

The second paragraph ends with, “the current wastewater system is considered sufficient with minor upgrades.” This statement significantly understates the need to add another lagoon above the campground and replace the entire forced main from the new lodge septic tanks to the wastewater facility up the hill. Both will require heavy construction and impact use in the area as well as the surrounding environment. The second paragraph also notes that flow data was provided from U.S. Forest Service since 2009, but the technical memo only includes 2015-2021. Why was the larger data set left out, particularly when two of the included years occupancy was heavily impacted by the COVID-19 pandemic, which depressed lodge usage? Considering the impact that this proposed facility expansion would have, the information provided here and in the technical memo is inadequate. **Clarification of Operating Season, User Days, and the full impact on the wastewater system and all required upgrades should be made clear for accurate review.**

The third paragraph notes that HLL/POWDR will be responsible for the wastewater system and upgrades. It notes the “wastewater lagoon, piping, and sprinkler area will be surveyed and added to the existing 15-acre permit area.” It appears that the sprinkler area is not incorporated in the proposed area of the attached WGM proposed plan, based on discussion with U.S. Forest Service representative on sprinkler locations and a walk of the site. This area is also outside the current fencing. Available county (2004) records show the plant failing 3 of 4 test samples for biologicals and suspended solids in irrigated water. This water is applied directly above the campground area in what appears to be an unfenced, unmarked area. **Most importantly here, the 15 acres is again referenced in this section. This proposal continues to state very basic factual inaccuracies.**

The remainder of this section notes what may have to be done based on more accurate flow data. Page 8 of 9 in the technical memo states “data collection would paint a more accurate picture of operational levels and a more informed determination on whether expansion of aerated lagoon or additional land application would work for the intended Lodge Expansion.” **If enough data are not available to complete this analysis to understand where there is a path to a workable wastewater solution, and with no clear definition of Operating Season and User Days, the proposed Master Development Plan should be considered incomplete and rejected.**

4.5.6 Parking and Vehicle Access

This section does not state the total currently defined or overflow parking capacity, so it is difficult to make a good or accurate comparison to the proposed Master Development Plan. Based on visits to site, I would estimate the current defined parking in front of lodge and near cabins as approximately 25 spaces. **The proposal is for 126 defined spaces, so approximately 500% greater.**

This section also notes that the roads and parking surfaces will be made of crushed and compacted rock and states that crushed and compacted rock has a higher infiltration than asphalt, reducing the potential for runoff into the lake. This may sound like an environmentally friendly option, but I have a few counterpoints:

1. Crushed and compacted rock is the least expensive option and does not allow surface accumulated water to be collected and potentially dealt with oil/water separation or debris collection.
2. As noted above, this area has a shallow water table. These lots are also providing expanded concentrated parking close to the lake. This pervious and inexpensive paving solution allows any fuel or oil spill, or sewage spill from parked RVs, to accumulate directly into the ground with no protection. This may mean easy progression to the water table and/or the lake with any substantial spill.

4.5.7 Public Health and Safety (clarifying this is the first section 4.5.7, since the next two sections are also 4.5.7)

This section is only one paragraph long and basically says additional work is required to address public health and safety. It gives no specifics. As seen during the public meetings in Condon and Seeley Lake, there are significant concerns with demands on highway and roads, Emergency Services, Fire Safety, and wildlife interactions. It is almost impossible to believe that all these concerns can be planned for or addressed before POWDR's discussed start of construction one year from now. This section is woefully inadequate.

4.6 New Construction

This section starts with "the goal with new construction is to provide diversity of lodging types, experience, and price points for guests." POWDR was unable in either public meeting to address costs of accommodations and dining. A "low" price point for lodge rooms was mentioned at \$200 to \$250 per night, and was noted to be lower than current lodge pricing. This answer was woefully incomplete and inadequate. The current pricing is known to be dual occupancy and include meals. \$250 a night may be lower than current \$300 a night cost (plus a 20% service charge), but does it include three meals? These questions were submitted in advance for the Seeley Lake meeting (as requested) but were never raised or addressed. And, if the cost is \$250 a night (let's assume dual occupancy) as the low option, what segment of the Montana population or the national population does this serve? Please analyze what percent of Montana or national population this is accessible to. These are **Public lands**.

4.6.1 Bob Marshall Lodge

Attaching Bob Marshall's name to this project in this location is entirely inappropriate and insulting. To quote Bob Marshall:

"There is just one hope of repulsing the tyrannical ambition of civilization to conquer every niche on the whole earth. That hope is the organization of spirited people who will fight for the freedom of the wilderness."

I feel the naming of this lodge is highly inappropriate to the spirit of the man.

4.6.3 Mission Mountain Restaurant

This proposed restaurant would surround two sides of the historic lodge and dominate it from the lakefront. I feel this is inappropriate to the only historic structure proposed to be retained on the property.

4.6.3 Old Lake Lodge

The proposed plan states "Our goal with the exterior of the Old Lodge is to leave it substantially intact and embraced for its rustic charm." It would be embraced on two sides by the Mission Restaurant. I do not feel this is an appropriately historic "embrace."

4.7 Proposed Development Schedule

This section does not address when construction has actually been proposed to start. Based on public meetings, the schedule proposed appears to be fall 2023 with construction through 2025. These dates are not noted in the proposed development schedule. The issues that may affect schedule area noted. If construction is in fact scheduled to start in fall of 2023, and based on current design, County permitting schedules, and contractor availability, it is reasonable to assume that POWDR has already engaged a design team. Permit documents will need to be submitted to the county in the spring of 2023, so a contractor is likely already on board. POWDR has not noted this in the proposed Master Development Plan, but it is a realistic assumption considering current construction environment in the area.

6.0 Historic Preservation

Only one building is proposed to be preserved, and for that the proposal primarily considers the exterior, which is then surrounded on two sides by the new restaurant. This section appears to have been included primarily for public appeasement value. It is not a historic preservation project, and calling it one is deceptive.

6.0 Historic Preservation and Mitigation

"Existing buildings are tired and in poor condition" is a fair statement. It appears that the current permit operator has done only minimal annual maintenance and has not made an effort for long-term preservation. Based on the current SUP, it seems the U.S. Forest Service could have required a higher level of upkeep on facilities to maintain the permit or cancelled the permit.

In general, these sections are woefully inadequate to address the historic significance of the property.

7.3 Shoreline Protection

This section notes “no new buildings or improvements are planned within the 20-foot shoreline protection zone.” The proposal **fully leaves out the fact that there will be construction and then visitor usage along the entire eastern extent of the SUP boundary -- where there is currently little to no development or impact. Based on the proposed increased acreage, the proposed resort will extend further to the east, through a wetland area, and onto the adjoining point where the “honeymoon” cabin is sited.** This section (like many minimizes and vastly understates the impact of this proposed Development Plan.

Beyond the Proposed Master Development Plan

The proposed Master Development Plan fails to address impacts to the adjacent camping area, trailhead, and nearby wilderness area. The replaced forced sewer main (as shown in Figure 4) runs directly through the campground. (I am not sure this is the correct routing, however, because it does not match other plans, but FS/POWDR/WGM have not provided the requested information to clarify this.) Will this proposed construction require shutting down part or all of the campground for part of a season or a full season? This is not noted. The plan does not note, but makes clearly obvious, that the campground will be impacted. Campsites 23-25 will be directly adjacent to the construction, and then long-term adjacent to maintenance, employee housing, concentrated trash collection, employee RV parking, a propane and generator building, and a large amount of guest parking. Mission Bay, on the west, would also have an expanded area in the SUP that makes it feel more private and less accessible. The U.S. Forest Service must assess the overall impact on the public campground, as it appears the activities, buildings, and operating hours of the proposed resort would substantially impact the public’s ability to enjoy the camping facility.

The proposed Master Development Plan fails to address the impact to lake usage (other than mentioning non-motorized recreation). The expanded extents of the proposed acreage, along with the placement of the floating docks, will create the impression of a private bay in the lake, less accessible to the public (see attachment).

To conclude, I oppose this proposed development and expansion. The proposed Master Development Plan is fully inadequate in details and has significant inaccuracies that make it both misleading and impossible to fully consider or accurately review. As such, the proposed Master Development Plan should be rejected by the U.S. Forest Service. Inaccurately stating—by a substantial amount—the incorporated acreage of the existing permit and then misleading the Public with this incorrect number throughout 34 of the 37-day public comment period should be disqualifying in and of itself. This is Public Land. For reasons I have stated, this proposal is not in the best interest of the Public.

Sincerely,

J. David Roberts