

Data Submitted (UTC 11): 9/12/2022 4:32:48 PM

First name: Ian

Last name: Watson

Organization:

Title:

Comments: The proposed Holland Lake Lodge Facility Expansion project should not proceed without, at minimum, an Environmental Assessment (EA) and sufficient time for the public to review and comment on the EA. The project represents a significant change to the existing impact of the Holland Lake Lodge and deserves the due diligence of completely understanding the impact to the wild lands and residents. Currently, the information presented in the Master Development Plan (MDP) and Scoping Package are written at a high level and offer few details of the environmental impact. Please complete the needed environmental assessment work to ensure transparency of the process and make sure that the impact of the expansion is more thoroughly understood and communicated. Some of the main topics that need to be addressed are:

Wastewater - The volume of wastewater generated from the Holland Lake Lodge will substantially increase with the increased occupancy. Has the work been done to demonstrate that this increased capacity, which will utilize a spray field ~650 feet uphill from the lake, will not contaminate the lake and/or groundwater? A cursory look on the Montana Bureau of Mines and Geology well database shows current water wells that produce the drinking water for the Holland Lake Lodge are perforated ~30 feet below ground level in a glacial outwash that doesn't appear to have significant barriers to communication between the surface and perforations.

Water -. The MDP states that the Public Water System is currently classified as a transient community public water system, defined as a public water system supply that is not a community water system and that does not regularly serve at least 25 of the same persons for at least 6 months a year. They also mention the proposed improvements will require a "layered approach" to maintain the transient, non-community exempt status. Is this splitting of the water system into two independent systems to maintain the exempt status consistent with the spirit of the exemption?

Wildlife - The Holland Lake area is important habitat for bull trout, Canada lynx, common loon, and grizzly bears. At the September 8 public meeting, the USFS biologist said the Holland Lake area was already a high use area and the additional impact of the expansion project would not be significant. That inference needs to be thoroughly studied, documented, and the results communicated.

I would also encourage the USFS to more fully consider the impact of the project on local visitors and residents. The current justification seems to focus largely on increased access for predominantly out-of-area visitors. This comes at a cost to locals, with increased traffic, noise, and potential environmental degradation. The economic benefit of the project would largely be realized by POWDR and the brunt of the impact felt by local residents and users.

Finally, I would recommend that the USFS look at alternative ways to achieve the items listed in the Need for Action section of the scoping document. For example, expansion of the parking area around the East Holland Lake Trail Connector Trailhead does not require the lodge to do the work. This project could be taken on by the USFS. Similarly, the degrading condition of the current Holland Lake Lodge could be addressed by removing the existing facilities and returning the area to its natural state. I realize both of these options cost taxpayer dollars, but they may be worth considering and putting forward for public comment.

Holland Lake is a special place, largely because it has not been extensively developed and still maintains its natural feel. The same is true for much of the Swan valley. I worry the Holland Lake Lodge facility expansion project could fundamentally change this and set a precedent for additional development in the Swan valley.

Thank you for the opportunity to comment on the project. I respectfully urge you to take the needed time and

effort to make sure that environmental and social impacts of the project are completely understood and communicated.