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Organization: Swan Lakers

Title: Board President

Comments:

Thank you for the opportunity to comment on the Holland Lake Lodge Facility Improvement and Expansion Project. I am the board president of 'Swan Lakers'. We are a 501(c)(3), not-for-profit organization, whose mission is to protect the water quality of Swan Lake and the Swan River watershed.

The sheer scale of this project will result in a material increase in waste water generation. Although the project calls for construction of new facilities for wastewater treatment, the possibility that these will fail, or prove inadequate, is always present. Consequently, the potential for contamination of Holland Lake, Holland Creek and ultimately the Swan River rises. This new threat comes on top of existing concerns over aging septic systems. We believe the project should include a water monitoring program that will measure effluent outflow from lake.

While Swan Lakers primary concern is preserving water quality, we want to add that the application of a "categorical exclusion" to this project is not appropriate. The exclusion from developing an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) is, according to 40CFR, 1508.1, applicable only when the intended project has no significant effect on the 'human environment'. Regulations go on to define "human environment" as "comprehensively the natural and physical environment and the relationship of present and future generations of Americans with that environment."

This project will increase guest occupancy capacity from 50 to 156. It calls for building a new 13,000 square foot lodge, a 3,000 square foot restaurant, 10 650 square foot cabins, 16 smaller cabins, a 2,000 square foot welcome center, new out buildings plus added parking, wastewater treatment and utility capacity.

A project of this scale, on the same 15 acre site that has always been the Holland Lake Lodge, is likely to have a significant impact the human environment.

We respectfully request that you revisit your intention to categorically exempt this project from either an EA or EIS. The impact on the human environment may well be profound. The project should, at the very least, be the subject of an Environmental Assessment.

Sincerely,

Jeff Kemp, Board President

Swan Lakers