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Comments: As the Forest Service considers the proposed major expansion of Holland Lake Lodge (HLL) and the accompanying development, the agency is legally obligated to inform the public of the full range of potential environmental impacts. The FS must also keep in mind its responsibility to ensure the integrity of Holland Lake's exceptional natural environment - consistent with the agency's mission; its legal obligations related to the conservation of fish, wildlife, watershed, water quality and public recreation; and the desires of the public that the agency is intended to serve.

Within this framework, our comment focuses on one of the many concerns raised by the proposed HLL expansion - its potential impact on water quality. The "Technical Memorandum" titled "Sewer System Assessment - Holland Lake Lodge" contains many assumptions, questions and conjectures, plus a number of recommended "improvements be considered in the future", with no assurances that the improvements will be implemented. The assessment that the wastewater system, last upgraded in 2004, is working properly seems to be based on a review of the original design specifications, plus a one-day site visit in July 2021. The memo notes the potential for the summer demand on the system to exceed its capacity when HLL is operating at its new projected full summer capacity. It also indicates the need for limits on winter use, so as not to exceed wastewater system capacity. Moreover, the memo contains no analysis of anticipated water quality impacts if the recommended system improvements are not installed. Nor does the document assess the impacts on water quality of increased runoff from the impermeable surfaces associated with the many new cabin roofs, parking lots and roadways in the expanded occupancy area along the lake shoreline.

It's also worth noting that Holland Lake Lodge is located within 40 air miles of the University of Montana's Flathead Lake Biological Station, a world-class freshwater research facility. Rather than simply assume that the existing wastewater treatment systems would adequately handle the increased pollutant loads, the developer should be required to contract with independent experts (not developer-contracted engineers) for a study to learn precisely what the HLL expansion project would mean for area water quality and Holland Lake's long-term health.

As of now, the only thing that is clear is the inadequacy of the Forest Service's proposed approach to apply a Categorical Exclusion and conduct no further environmental review of the proposed Holland Lake Lodge expansion. The Holland Lake Lodge development proposal represents a major change in land use, and should be studied in a thorough and unbiased manner. Holland Lake is too valuable a public resource to risk.

Thank you for your consideration of these comments.