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Title:

Comments: In light of the new information that is continually surfacing regarding the proposed expansion at Holland Lake, I would like to amend my earlier comments with an additional statement.

I wholeheartedly object to the proposed expansion of the Holland Lake Lodge as currently proposed by the Flathead National Forest, POWDR and Holland Lake Lodge, Inc.

The proposed expansion calls for tripling occupancy at the lodge from 50 to 156, plus employees, bringing the potential daily number of users to 173. Holland Lake is small and already beginning to feel the effects of overcrowding. Floating docks would increase water user conflicts and would be a huge safety issue. Increased traffic on the trails and roads would increase user conflicts as well as collisions and conflicts with the abundant wildlife in the area. The increase in garbage from guests and the proposed 3000 sf restaurant would be an attractant for bears and other wildlife. Individual bathrooms in 28 lodge rooms and 26 cabins would put huge pressure on the wastewater treatment system and would threaten the pristine water quality of Holland Lake. This increase in occupancy would be directly proportional to a decrease in the quality of the outdoor experience for all, including locals, the general public, and the large number of guests the developers are hoping to attract.

Regarding Wildlife: As documented, and as the Forest Service is well aware, grizzly bears inhabit the Swan and Mission Ranges in and around the Holland Lake area. I am shocked that the Master Development Plan attempts to gloss over this. Grizzly and black bears have visited Holland Lake residences, campgrounds, ranches, and the Holland Lake Lodge on countless occasions. Bull-trout, lynx, wolverines, loons, and other threatened and vulnerable species must also be considered. A full NEPA review of potential impacts to endangered, threatened, and vulnerable wildlife should be required.

Regarding Water Quality: The proposed expansion of the Holland Lake Lodge would also negatively affect the pristine water quality at Holland Lake. New and expanded grass lawns and access points would introduce fertilizers, herbicides, and sediments into the lake. An EIS is required where bull trout waters are involved.

Regarding Wastewater: The proposed plan calls for an expansion of the waste treatment facility at Holland Lake and notes that the operation and maintenance of this facility would be conducted by the developers. The potential for abuse and/or neglect of this pivotal human health and sanitation service is high and the threat to Holland Lake's pristine water quality is concerning to the public.

Regarding Historical Value: The proposed plan disregards Holland Lake's historic values. The Holland Lake Lodge is eligible to be listed on the National Register of Historic Places. The proposed expansion will constitute an adverse effect to a National Register property as specified in the National Historic Preservation Act.

Regarding the Unique Qualities of the Area: Holland Lake has long been revered for its quiet, peaceful, and scenic qualities. Even Christian Wohfeil himself stated, ""Let's face it, there aren't many places you can walk out on a point, see two snow-capped mountain ranges, a stunning waterfall and virtually no development." (Christian Wohlfeil, Missoula Magazine 2010). Decades ago, when the Forest Service first started plotting lots for summer home residences, they intentionally set these lots back from the lake and tucked into the trees to protect the panoramic views. This proposed expansion, with over 30 new buildings, all very visible from the lake, completely belies this and would adversely affect the landscape. The proposed "bunkies" are ridiculously out of character. Despite efforts to control light pollution, increased lighting would undoubtedly alter the nighttime landscape. The beautiful and cherished views in and around Holland Lake would be forever altered.

I have additional questions and serious concerns regarding the process:

Why has the permitted acreage inexplicably increased from 10.53 to 15? The public would like to see the full documentation behind this, including historical documents and maps. The public has repeatedly asked for this information and has not yet received a reply.

Why is Kurt Steele, Forest Service, co-presenting public meetings and "conversations" with Holland Lake Lodge and Powdr, and why is the "conversation" on 10/4 in Condon not on the Forest Service's official website? It would appear that he is attempting to "sell" the project to the public, which does not constitute broad public notice and is a violation of Montana Public Meetings Law.

Why is the Forest Service intentionally trying to fast track this proposal with a Categorical Exclusion? A project of this size and scope certainly requires a full EIS and EA. The Master Development Plan was not made available to the public until September 6th, and additional information and documents have been added piecemeal. The public should have at least a full 60 days to review and comment.

Why are there gates on the Master Plan that will effectively shut the general public out of National Forest land? Past and present practices at both Holland Lake Lodge and at Powdr's other properties indicate that they are unwelcoming to the general public. How is this then in the public interest?

Are there plans for a "phase 2" that would encroach further into public lands? Looking at Powdr's previous projects, this seems to be their modus operandi and doing so would further exclude the public from public lands. I'm going to say this again: This proposal is not in the public interest. Perhaps it would better serve the public to revoke the permit entirely, and create a more rustic/primitive site on the property instead. Campsites and existing cabins would be more widely accessible and would be much more appropriate for the area and public land than a high-end lodge.

Why was an amendment made to the Special Use Authorization on August, 19, 2022 that would allow for the drilling of two new wells for pump testing? This indicates to me that the Forest Service and Holland Lake Lodge are moving forward with this project before the public has had the opportunity to fully review and comment.

Why is there a trailer belonging to Wood Solutions, LLC on the Holland Lake Lodge leased site? And why was it placed on the leased public land before the public became aware of the massive proposed development expansion at Holland Lake Lodge? Are logging and cutting operations scheduled to begin before the public has had the opportunity to fully review and comment? Did somebody at USFS approve this?

These and so many other questions need answering. In addition, it is imperative that the historical value of the property, the effects on wildlife, water quality, and wastewater treatment, and the cultural and economic impacts on the local community are thoroughly studied and considered. The Forest Services owes the public that it serves COMPLETE TRANSPARENCY. The public should be properly and assiduously informed and given adequate time and opportunity to weigh in and have their questions answered honestly and thoroughly.

Again, I am opposed to this proposal.