

Data Submitted (UTC 11): 10/7/2022 7:18:27 PM

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Comments: Comments regarding the Holland Lake Lodge Facility Expansion Project

Issues:

1. Forest Service miss reading in applying 36CFR 220.6 (e)(22) to the proposed development. This CFR is intended for minor improvements and repairs of existing recreation facilities allowing the proponent not to have to provide environmental documentation and/or assessment. The proposed action goes well beyond the intent of 36 CFR 220.6 (e)(22). At a minimum the proponent should be required to provide an assessment to document existing conditions, proposed improvements and the extent of modification of existing utilities to accommodate the future development and visitors.

2. Wastewater Treatment. The Master Development Plan mentions that the existing wastewater treatment facility will be used for the future development. This facility was installed over 50 years ago and upgraded 20 years ago. The WGM Group evaluation of the facility included the statement that "since 2009, significantly less flow has entered the treatment lagoon than what the system was designed for". Based on this, WGM Group assumes the facility is sufficient for the proposed development. One might question why the lagoon receives less flow of effluent. The wastewater collection system needs to be assessed to ensure there is no leakage from the existing buildings or the pressure tightline to the offsite lagoon. The lines are 50 years old and need to be inspected. The proposed Wastewater Lagoon improvements and upgrades being proposed should require the documentation and impact assessment discussed in item 1 above.

Additionally, the plan does not describe management of wastewater from the individual cabins. Will each cabin have a septic tank?

3. Stormwater Collection and Treatment. The Master Development Plan does not address stormwater issues on the existing site or the proposed improvements. It does mention that the driveways and parking lots will be composed of crushed rock and expects stormwater to infiltrate through this "pervious" surface. In reality, crushed rock surfacing does not infiltrate to any significant extent. The driveways and parking lots would need to be designed with a specified depth of rock under the top course of crushed rock adequate to accept the stormwater and hold it for a period of time. This is both expensive and difficult to maintain.

Relying on infiltration to manage stormwater is complicated by the fact that the existing well on the site and near the existing buildings and proposed driveways and parking lots is only 10 feet deep according to the Master Development Plan. There seems to be no concern about contaminants from the parking lots and driveways getting into the well water not to mention into Holland Lake. This needs to be addressed before approval of this project.

4. The Site Plan included in the Master Development Plan is difficult to read but it appears the vehicle circulation system does not provide fire lanes for emergency vehicles to any of the planned or existing structures. Should there be a medical emergency in one of the cabins, emergency vehicles and/or personnel would have to stage in one of the parking lots and access the cabin by foot. Should a fire breakout in any of these structures, staging would again be in the parking lots. Fire lanes need to be designed to accommodate emergency vehicles which will likely require more trees to be removed and other improvements impacting the site.