

To: Supervisor Steele, Flathead National Forest

From: Judy Reese

Date: September 16, 2023

Please consider the following comments on the proposed Holland Lake Lodge Facility Improvement and Expansion project.

I question the legal merit of the proposed categorical exclusion assessment for the proposed project. Under 36 CFR 220.6 (b)(1) Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS include:

- (i) Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species;

Clearly grizzly bears, a listed species are inhabitants of the area. I personally have seen grizzly bear hair in tree wire snares on Forest Service trail #192, which ends at Holland Lake. The comment that grizzly bears have never been seen at Holland Lake is suspect. Additionally, it is conceivable that lynx also occasionally inhabit the area. All pertinent State and Federal wildlife data, inventories, reports, and analysis must be reviewed as part of this proposal. A synthesis and evaluation of the information should be presented to the public as part of this proposal.

The proposed construction of 32 NEW buildings (dwelling space of an ADDITIONAL 23,000 sq. ft) is a SIGNIFICANT impact to the local and surrounding environment. This coupled with the anticipated three-fold increase in occupancy will clearly have a significant impact.

It is noteworthy that an original intent of NEPA was to put environmental concerns on par with economic motivations and technological feasibility when making decisions that affect the environment. Clearly, the proposed development is based on economic motivation, not environmental. As discussed, herein, the environmental (including wildlife) impacts have not been fully assessed. Clearly, at a minimum an Environmental Assessment is warranted for the proposed action.

I question the validity of the adequacy of the existing sewage treatment system to handle a three-fold increase in effluent. It is hard to believe that the existing sewage treatment was built to handle the proposed magnitude of effluent. Given the proposed increase and shallow water table, I believe additional analysis on this subject is warranted and should be required.

Holland Lake is one of the few lakes in the area that continues to host nesting loons. The current small rustic lodge character is appropriate for the area. The resource integrity and spirit of Holland Lake will NOT be retained if the proposed project is

approved and comes to fruition. In my opinion, it will severely negatively impact the Holland area, wildlife and habitat. Updating the lodge and replacing the existing cabins with similarly sized cabins would retain the spirit and integrity of Holland Lake.

Thank you for your consideration.

Sincerely,

Judy Reese