

October 6, 2022

Kurt Steele, Supervisor
Shelli Mavor, Project Leader
Flathead National Forest
Swan Lake Ranger District
200 Ranger Station Road
Big Fork, MT 59911

Subject: Holland Lake Lodge Facility Improvement and Expansion Project # 61746

Dear Supervisor Steele and Project Leader Mavor:

Thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Improvement and Expansion project.

I strongly object to the Flathead National Forest's stated intent to utilize a CE to fast track this project through the analysis process when a very cursory look at the proposal indicates to me that there are numerous issues that will likely result in significant environmental and social impacts if this project is implemented as described.

I have been visiting Holland Lake and the campground and lodge facilities since the 1970's, as both a frequent recreationist, and also for multiple wedding parties. The sense of place that exists at the lake is classic "old Montana" that the Swan Valley exemplifies. It is a stretch for me to imagine that the proposed development by an out of state hospitality corporation will maintain that character. Park City, Utah has long since lost its historic charm, please do not let POWDR do to the Swan Valley what has been done to the Park City area.

Holland Lake is a well-known and treasured place both for the Swan Valley community and the region, as it is a destination for a variety of recreationists and contains important natural resources and scenic value. For this reason, thorough understanding of the proposal, its potential impacts and benefits, and community input are important to ensure an outcome that works for the community, the lodge owners and the Forest Service. Such an understanding cannot come from the level of analysis that a CE would entail.

I have concerns about how the increase in use from both the expansion of the lodge facility and its associated overnight guests, day users, and from an increase in the permitted seasons of use will impact fisheries, terrestrial wildlife, water quality, traffic, recreation economics, and aesthetics of Holland Lake and the Swan Valley as a whole.

The project documents are very vague about how State and federal laws will be complied with, and who will be responsible for ensuring that relevant permits are acquired. The lack of USFS analysis through a robust NEPA process may shift the burden for analysis to Montana taxpayers to satisfy Montana Environmental Policy Act requirements before Montana state or county permits can be issued for some of the proposed actions.

Federal Clean Water Act required permits will need to be obtained for both the construction of expansion related facilities (i.e. Army Corps of Engineers 404 permits, associated state issued 401 Water Quality Certifications, NPDES permits for construction and stormwater management).

An analysis should be conducted to ensure compliance with the Endangered Species Act for multiple terrestrial and aquatic species.

The proposed expansion water-based recreation and boat launch/marina facilities have the potential to necessitate increase public safety services. Will local residents be on the hook for those expenses?

The issues I have raised above require that the USFS Flathead National Forest (FNF) re-assess the CE approach to meeting mandated NEPA processes. I encourage the FNF to go back to the drawing board on this proposed project and conduct an EIS before making any decision on the Holland Lake Lodge Facility Improvement and Expansion.

Thank you for considering my input.

Douglas Cushman