

Kurtis E. Steele, Flathead National Forest Supervisor
Attn: Shelli Mavor
200 Ranger Station Road
Bigfork, MT 59911

October 7, 2022

Dear Mr. Steele,

The following are comments regarding the Holland Lake Lodge Facility Improvement & Expansion project #61746.

The Forest Service should analyze the proposal in an Environmental Assessment or Environmental Impact Statement. The scale of the proposed expansion, extended use seasons, increases in public use, and related direct, indirect, and cumulative effects in the Holland Lake landscape is inconsistent with the agency proposal to exempt the project from documentation in an environmental impact statement or an environmental assessment. Clearly, the proposed action is more extensive than what is addressed under 36 CFR 220.6(e)(22). A reasonable alternative to consider in detail is not to increase the number and size of the facilities from what is currently permitted, while allowing for upgraded infrastructure such as water and wastewater systems.

The Forest Service states, *"the Holland Lake Lodge Facility Expansion project [is] to repair the existing historic lodge and improve or replace facilities to provide modern amenities... Due to an increase of people visiting and living in the Swan and Flathead Valleys, it is desirable to upgrade public facilities and enhance access to the outdoors in areas of the Flathead National Forest designated for focused recreation activities."*

Comment: It isn't clear what is meant by modern amenities. All constructed and reconstructed facilities visual appearance should be consistent with the guidance in the Forest Service Built Image Guide Handbook. Structurally, they should be energy efficient. More important, the proposed expansion is more extensive than just improving and replacing facilities. The proposed action is a substantial expansion of the facilities and infrastructure on the site.

Holland Lake is already highly developed with summer homes, campground, and lodge area. How does the proposed expanded use affect day use by the general public? For example, Holland Lake Falls is already often crowded. The Forest Service does not present an analysis that supports the statement that the project will, *"enhance access to the outdoors."* Excessive crowding will lead to recreationists not finding the experience sought and could lead to displacement of some users.

A Management Area desired condition is that *"local communities can readily access these areas"* (Forest Plan pg. 110). It should be understood that recreationist should find high-quality recreation opportunities. To fully understand the direct, indirect, and cumulative effects of this proposal on general public use, the Forest Service should complete a comprehensive recreation

management plan for the Holland Lake area that addresses the interrelationships between permitted and private use, while defining carrying capacity for the area developed sites, trails, and attractions such as Holland Lake Falls. This Holland Lake Recreation management plan should be completed prior to considering approving additional or expanded facilities and expanded use at Holland Lake Lodge. Unless supported by comprehensive analyses, the Forest Service should not be stating that the expanded development responds to the recreation demand.

The Forest Service states, *“Increased use is also occurring at the adjacent USFS East Holland Lake Connector Trailhead. This increase in use is creating a situation in which users park along the Holland Lake Road because there is no longer room in the existing trailhead parking area. Additionally, the existing vault toilet is no longer adequate to handle the amount of use it experiences. This situation may be causing additional resource concerns as users find alternative options.*

Improvements at the Holland Lake Lodge and the East Holland Lake Connector Trailhead would offer the opportunity to satisfy some of the increased demand for outdoor recreation on public lands in the Swan and Flathead Valleys (Figure 2 & Figure 3).

Proposed expansion of the East Holland Lake Connector Trailhead would include expanding the parking area to provide for additional vehicles and upgrades to existing vault toilet or an additional vault toilet.”

Comment: The Forest Service should recognize that the agency has a responsibility to manage visitor use to provide for desired experiences. The proposed design criteria to address increase parking and use does not mitigate the expected additional crowding along the lake, on trails, and at Holland Lake Falls.

The Forest Service is a member of the Interagency Visitor Use Management Council (IVUMC).¹ The Forest Service should develop a comprehensive recreation management plan for the Holland Lake Area prior to considering expanding the Holland Lake Lodge and related facilities. Recreation assessments for this proposal and the recreation management plan should follow the guidance established by IVUMC.

The Council has developed a Visitor Use Management Framework that is designed for federal managers to collaboratively develop, implement, and monitor strategies and actions to provide sustainable access to lands and waters. The intent, and ultimate desired outcome, is to provide high quality visitor experiences, while protecting natural and cultural resources.

Responsive and effective visitor use management requires managers to:

- Identify desired conditions for resources, visitor experiences, and facilities/operations;

¹ <https://visitorusemanagement.nps.gov/>.

- Gain an understanding of how visitor use influences achievement of those goals; and
- Commit to active / adaptive management and monitoring of visitor use to meet those goals.

The framework can be incorporated into existing federal agency planning and decision-making processes and is applicable across a wide spectrum of situations that vary in complexity and spatial extent from site-specific to large-scale planning efforts. The framework is a legally defensible and transparent planning and decision-making process that:

- Integrates applicable laws and policy requirements;
- Provides sound rationale upon which to base management decisions; and
- Facilitates adaptive management.

The framework identifies four overarching elements with discrete steps under each. The framework is intended to be applied in a flexible manner using the sliding scale concept. The strengths of this framework are that it is iterative, adaptable, and flexible.

In addition, recreation planning for the area should be consistent with the Recreation Opportunity Spectrum framework and Scenery Management System, which would meet the requirements of NEPA (40 CFR 1502.24 - Methodology and scientific accuracy).

The Forest Service states, *“Holland Lake is identified by the Flathead National Forest Land Management Plan as a Management Area 7 - Focused Recreation (USDA 2018). The improvements proposed at Holland Lake Lodge align with recreation uses permitted in Management Area 7. Focused Recreation Areas typically include public recreation areas at or near a lake, large campground, developed ski area or year-round resort. Recreation in these areas is already occurring and is often enhanced by further development to increase public access and benefit local economies...”*

Comment: A Management Area desired condition is that *"local communities can readily access these areas"* (Forest Plan pg. 110); hopefully, to find high-quality recreation opportunities. The proposal would likely lead to increased crowding at Holland Lake Falls, on trails, and along the shore of Holland Lake, which could degrade visitor experiences.

The Forest Service states, *“Holland Lake Lodge would initially be operated during the summer season, approximately May 15 to October 15. All new buildings would be winterized in anticipation of sufficient demand to operate during winter season, approximately November 20 to January 15 annually.*

Proposed expansion would provide overnight accommodations for up to 156 guests. Staff housing for up to 12 employees and five recreational vehicle spaces for employees equipped with electrical and sewer hookups The HLL General Manager in the Manager’s residence would remain on site unaltered in its current location (Figure 3).

Further detail on proposed activities may be found in the Holland Lake Lodge Master Development Plan (MDP; Table 1: Proposed Improvements, Figure 3: Proposed Site Plan, Figure 4: Proposed Utility Plan).

Additional details regarding preliminary project design criteria may be found in Appendix A and Holland Lake Lodge Operating Practices may be found in Appendix B.”

“Construction of New Structures - New constructed facilities would include:

- 1. Bob Marshall Lodge (28 rooms, two-story, 13,000 square feet)*
- 2. 10 lake cabins (650 square feet each)*
- 3. 16 smaller studio cabins (250 square feet each)*
- 4. New Welcome Center (2,000 square feet, single-story building) for check in and retail*
- 5. The Mission Mountains Restaurant (3,000 square feet) would be constructed adjacent to the Old Lodge, separated by a breezeway...*
- 6. Small watersport building (400 square feet)*
- 7. New support buildings which would include a maintenance building (2,000 square feet) and employee housing (2,000 square feet).”*

Comment: The proposal is a significant expansion of facilities and use that will lead to substantial negative impacts to the general public use of the area and may lead to natural resources impacts along the lakeshore. These effects should be addressed in an EA or EIS.

Appendix A design criteria (mitigation measures), should be binding to the special use permit, be specific, and effective. The following is a succinct review of the recreation elements:

- 1) Increased vehicle traffic, noise, road maintenance, dust abatement, and safety on Forest Service Road (FSR) #44 (Holland Lake Road) would be addressed as project will result in an increase in vehicles utilizing FSR #44 potentially negatively affecting adjacent campground and trailhead users.

Comment: This design criteria are ambiguous. How would it be addressed? Mitigation measures need to be specific and measurable.

- 2) A cost share agreement between the USFS and HLL for road maintenance, snow removal, and monitoring would be developed and implemented.

Comment: This should be detailed and made part of the Special Use Permit.

- 3) HLL would assist with development, construction, and maintenance of non-motorized access trails between the adjacent campground and trailhead.

Comment: This is not specific nor is it a design criterion.

4) Natural vegetation screening should be maintained as much as possible between the campground, trailhead, and the Holland Creek Falls National Recreation Trail (NRT).

Comment: It isn't clear the proposed architectural design meets Forest Service design standards. New facilities should be further setback from the lake and be consistent with the Forest Service Built Image Guide Handbook²

5) Minimization of number of user trails between campground and HLL by selecting and designing no more than two (2) strategic points of access. Non-desired or non-planned user created routes should be reclaimed as soon as feasible.

Comment: It isn't clear how this would be effective.

6) Minimization of number of user trails between the trailhead/Holland Creek Falls NRT and HLL by selecting and designing no more than one (1) strategic point of access. Non-desired or non-planned user created routes should be reclaimed as soon as feasible.

Comment: This criterion is meaningless given the proposed action to expand the facilities and trailhead. A Holland Lake recreation management plan should address use and carrying capacity for the Holland Lake area.

7) Forest and natural resource educational, interpretation, and information signing will be incorporated throughout HLL to encourage "Leave No Trace" ethics, to inform and educate visitors.

Comment: It is not clear what is meant by "throughout HLL."

Reimagine Recreation: The Forest Service describes that the agency is "*creating an inspired new vision for outdoor recreation on America's National Forest and Grassland [to] reimagine recreation*" (publication dated August 2022, FS-1204a). The basis for this initiative is not clear, nor is the intended outcome apparent. The existing recreation planning protocols, as adopted by the IVUMC, are effective if properly implemented. Please adhere to the IVUMC recreation planning principals and the use of the Recreation Opportunity Spectrum and Scenery Management System in your assessments. These recreation planning systems are applicable to this project and will partially meet the requirements of NEPA assessments if properly implemented.

I appreciate your consideration of these comments.

Greg Warren
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² https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/TheBuiltEnvironmentImageGuide-2001-09.pdf.