

Kurtis Steele  
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RE: Holland Lake Lodge Facility Expansion

We are the owners of a cabin on Holland Lake which has been in the family for 60 years. This rustic cabin in the woods on the southern shore has provided several generations with summertime gatherings of swimming, hiking, canoeing, roasting s'mores over the campfire, and star-gazing. We have been privileged to see and share these woods, water and sky with hummingbirds, squirrels, turtles, trout, eagles, otters, loons, moose, beavers and bears.

We are providing the following comments on the Holland Lake Lodge Facility Expansion. Multiple generations of our family have visited the Lake and enjoyed its peaceful and beautiful scenery. We do not dispute that Holland Lake is a special place. We question, however, whether the integrity of the important natural resources of the Lake and the spirit of the place can be preserved with the significant modifications and expansion that are proposed.

The proposal would expand the capacity of the Lodge from the current capacity of 50 guests to 156 guests, with upgrades to promote year-round use. This is approximately three times more overnight guests. In addition, a kitchen with a significantly expanded capacity that is designed to serve three times more meals than the existing kitchen will be added. Ten cabins at 650 square feet each and 16 cabins at 250 square feet each will be built. The location of these cabins, in addition to the proposed lodge expansion will be visible from our side of the Lake and affect our usage during the day and our enjoyment of the Lake at night due to increased lighting in the area.

This proposed expansion is far too much for the site, and the use of a categorical exclusion for this project is not appropriate.

First, the categorical exclusion in subsection 6(e)(22), by its own terms, is not appropriate for the significant expansion that is proposed, including a new 13,000 square foot lodge, 10 cabins totaling 6500 square feet, an addition 16 cabins totaling 10,200 square feet, a 3000 square foot restaurant, and additional support buildings, as well as increased parking. Subsection 6(e)(22) applies to construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site, including infrastructure or improvements that are adjacent or connected to an existing recreation site and provide access or utilities for that site. Cited examples of recreation sites include, but are not limited to, campgrounds and camping areas, picnic area, day use areas, fishing sites, interpretive sites, visitor centers, trailhead, ski areas, and observation sites. None of the cited examples in this categorical exclusion involves the construction of a 13,000 square foot 28-room lodge or a 3000 square foot restaurant. The reason for this is that this is not the type of activity where it can be expected that there will be no significant effect on the environment.

Pursuant to 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 the presence of sensitive species. Holland Lake supports Westslope Cutthroat Trout, Bull Trout, and other species. The area supports populations of grizzly bear and Canada Lynx, as well as gray wolves, elk, moose, deer, mountain lions and wolverines. Many bird species are seen frequently at the Lake. This should be considered, and even if the subsection 6(e)(22) categorical exclusion did apply, the presence of sensitive species in the area would preclude the Forest Service from relying on it to justify a complete lack of NEPA review for this significant development proposal.

We note also that the analysis done to date has identified data gaps in the understanding of the increased need for wastewater treatment. Increased treatment capacity and storage is clearly required to accommodate the proposed Lodge capacity of 165 people including staff. The cited exemption in subsection 6(e)(22) does not include the described wastewater treatment and storage expansion among the cited examples because it is clear that this has the potential for significant impacts and is not subject to a categorical exclusion. The full extent of the facilities also appears to be unknown at this time. The same is true of the expanded groundwater pumping to provide water for the project.

NEPA requires federal agencies to take a hard look at the environmental consequences of their actions. In addition, NEPA requires that this hard look, in the form of an Environmental Assessment or an Environmental Impact Statement, be done before an agency has committed resources to an action. We assume that the proposal at this point is neither irreversible or irretrievable, and we urge the Forest Service to work with the local community and the families that use the area to develop a proposal that will truly respect the resources and honor the spirit of Holland Lake and the surrounding area. We also urge the Forest Service to undertake a thorough NEPA analysis considering the impacts of the proposal on all affected resources and alternatives to reduce those impacts before proceeding.

We look forward to further discussions and greater community participation and input on this significant new development. It is critical that the Forest Service consider the environmental impacts and the interests of the locals who have been a part of this special place for decades.

Sincerely,

Sarah and Chuck Aydlett