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Organization:

Title:

Comments: Dear USFS Holland Lake Reviewing Board,

Upon review of the numerous newly uploaded environmental documents on the Forest Service's Holland Lake project website, we would like to comment.

The Forest Service has failed to consider the significant environmental impacts to endangered species and designated critical habitats that will result from the huge construction project planned. The Holland Lake area is home to endangered species and borders the Bob Marshall Wilderness Area. The fact that very little, if any, discussion of the effect of the project on endangered animals and the Wilderness Area prove that there has been insufficient analysis of individual and cumulative effects of this project.

Specifically, I am concerned about common loons. About 200 common loons call Montana home summer. Of those, about 70 pairs nest mostly north of Missoula and west of the Continental Divide. The species is listed as a "Species of Concern" and is a "Sensitive Species" in Montana. The Montana Loon Society (MLS) had its beginnings in the 1980's to oversee the needs of Montana's loons. In 2000, the Common Loon Working Group (CLWG) formed. These groups are so concerned about Montana's loons that together we hire Loon Rangers to place in the field to tend to the needs of our nesting loons.

A common loon pair nest close to the present Holland Lake Lodge. The birds nested this year (2022) on Holland, but our formal summer survey did not document a chick. We assume the nest failed. However, in early August some members of the public reported a chick on the lake with adults. We have not been able to confirm if we missed a chick hatching at the lake this year. Regardless, we've had nesting the last 4 years (2019, 2020, 2021, 2022) at the lake with confirmed chick production 3 of the last 4. All the annual nests have been in the same bay on the lake (indicated on the attached Google Earth map). The birds nest on the lake shore to the east about 0.5 miles from the Lodge area. The first 3 years the birds nested successfully on the shoreline right below the Holland Falls trail which is a popular trail in the spring and summer. The nesting loons on Holland Lake are relatively recent as we don't have any record or knowledge of loon nesting on Holland Lake from at least 2004 to 2018.

Common Loons also need other area lakes for foraging, and interaction with other loons for breeding. In 2022, we had loon nesting on other lakes in the Swan Valley including Loon Lake (Kraft Creek), Peck Lake (new this year), Van Lake, Pierce Lake, Loon Lake (Ferndale) as well as a late confirmed loon nest on Lake of the Woods (private lake on the east side of the Flathead Valley). Holland Lake is an important interconnecting lake between the Seeley Lake area on the Lolo National Forest and the Flathead National Forest.

Holland Lake is a motorized Lake with a public boat ramp at the south end of the Day Use area next to the outlet. The boat ramp is relatively primitive and the location at the outlet is shallow which by nature limits the size and type of boats that can put in to the lake to some degree. The new development would allow much larger boats, as well as more boats and jet skis. The large number of rooms, cabins, campground sites, etc. will also produce a larger number of non-motorized watercraft, such as canoes, paddle boards, bicycle boats, etc. All of these will further stress the loons.

Further, the Holland Lake Lodge expansion proposal will have significant impacts that the Forest Service must evaluate. The significant impacts and questions make the project not eligible for using the categorical exclusion. Here are just some of the impacts that need to be evaluated:

* The lodge is anticipating increasing the use by at least 3 times its current use. This will add significantly to the vehicle traffic on the highway where we have already had two people killed this year. The highway is already so busy that it must be exceeding safety standards. It is likely

that safety improvements on the highway will be made necessary by adding more vehicles due to the lodge expansion.

* The added traffic would have a significant effect on wildlife (deer and bears) from collisions and noise.

* The garbage generated by the lodge will be a significant attractant to wildlife. Are there any studies that prove that their suggested trash management will not be an attractant that will lead to the death of animals and create a safety hazard for humans?

* The Forest Service needs to complete a detailed review of the sewage treatment plan to ensure it will be effective and not just take their word for it. As the lodge expansion is not possible without the treatment, this analysis needs to be done before the Forest Service approves the expansion.

A failure of the treatment system could severely endanger the quality of the water in the lake. The Master Plan justifies much of the expansion because of the dilapidated conditions of the buildings, which points to a lack of maintenance and concern for the facilities on the part of the current owner. Consideration must be given to the potential lack of maintenance of the waste water treatment based on this poor track record.

* Removing a lot of the trees that shade the shoreline could increase the temperature of the water. Is this consistent with the Forest Plan requirements for riparian vegetation? What impact will this have on the aquatic species in the lake?

* The influx of people year around could have significant impacts on the community, such as driving up the cost of living and housing so that people will not be able to afford to live here.

* We are suspicious of the timing of the Forest Service's recent approval of the expansion of a nearby gravel pit which none of us understood the purpose for. Now I think this is to support undisclosed highway and road improvement. This, along with the county's planned garbage transfer station which also has not been justified, make me concerned that there are a wide range of connected actions that this project will cause and need for its operation.

With the community's apparent opposition, the likelihood of significant impacts needs to be evaluated in an environmental impacts statement. The Forest Service should not assume that the impacts stated by the lodge are accurate and need to do their own independent review. The Forest Service needs to seriously consider the public's comments and evaluate the impacts they are concerned about.

For all of these reasons, we oppose this project as it stands now. The Forest Service needs to follow the requirements of NEPA before making any decisions.

Thank you,

Donna Love
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