

Missoula County Commissioners

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BCC 2022-245
Oct. 6, 2022

U.S. Forest Service, Swan Lake Ranger District
Attn: Shelli Mavor
200 Ranger Station Road
Bigfork, MT 59911

Re: Holland Lake Lodge Facility Improvement & Expansion

Dear Ms. Mavor,

Thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Expansion project, and for extending the comment deadline. According to the Sept. 1, 2022, scoping letter, the proposal is for the repair and expansion of the Holland Lake Lodge that operates on U.S. Forest Service land through a resort/marina special use permit with the Forest Service. 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.

At this early stage, our primary concern is the proposal to categorically exclude the proposed project from documentation in an environmental impact statement or an environmental assessment (EA), based on the guidance in 36 CFR 220.6(e)(22). The proposed project would have potential impacts to several of the resource conditions cited in 36 CFR 220.6 (b), including at least four threatened and endangered species, floodplains and wetlands, potential wilderness area, historic properties, as well as significant levels of public interest. While it remains unclear whether the Flathead National Forest may have the authority to categorically exclude this proposal, it certainly has the authority to choose not to do so. We request that the Flathead National Forest complete an EA for this project to better assess individual and cumulative impacts, evaluate alternatives to the existing proposal and improve transparency in the decision-making process.

Other concerns that require considerable attention include:

- Holland Lake and the surrounding area contain numerous valuable resources, including important habitat for three species listed as threatened under the Endangered Species Act: bull trout, grizzly bear and Canada lynx, as well as the wolverine, which is in the process of being listed. We are concerned about the potential impacts this proposal would have on these species, and we think they merit further analysis. For example, Holland Lake is within an area identified by the Northern Continental Divide Ecosystem