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First name: Joni

Last name: Packard

Organization:

Title:

Comments: Thank you for the extension of the public comment period for the proposed expansion of Holland Lake Lodge. I have a number of concerns:

*Use of a categorical exclusion (CE) is inappropriate - the proposed changes, including the scope, scale and intensity of physical changes (major ground disturbance, demolition of buildings, increase in facilities, construction of new buildings, expanded parking, new utility corridors, etc.), and the changes in the scope and scale of additional use, including changing from a single season of use to a 4-season/year round level of use does not fit any CE categories. At a minimum, an EA, and likely an EIS should be the level of analysis that should be conducted.

*The proponent's recommendation and advocacy that the CE category under 36 CFR 220.6 Infrastructure (recreation sites) (e) (22) be used is not appropriate nor valid. This category is for minor recreation repair and maintenance needs, not for major facility changes, demolition, and new construction, nor is it an appropriate category for major operational changes to a lodge/resort's permitted operations. (A similar CE category at 36 CFR 220.6 (d) (9) for ski areas only allows administrative updates, not any changes to an operating plan or changes to facilities - why would major new construction, demolition, and expansion of operations for a lodge/resort be any different?).

*There are potential extraordinary circumstances due to likelihood of impacts on an endangered species (grizzly bear) and potential adverse interactions due to higher numbers and concentrations of people as well as an expanded, year-round season of use.

*There are potential extraordinary circumstances with adverse impacts to wilderness/wilderness character due to increased use/higher numbers of people accessing the Bob Marshall Wilderness through trails from the north (Holland Lake lodge) side of the lake.

*There are potential impacts to wilderness character and possible designation for the Swan Crest recommended wilderness area due to increase in use from this proposal.

*Public concern over potential changes to their recreation experiences is significant. There will be permanent, irrevocable changes to the recreation experience and to the character, scenic integrity, and sense of place that recreationists, residents, nearby communities, and other users near and far (including lodge guests), value and come to Holland Lake for.

*A "motel style lodge" (which looks closer in design to motels located in national parks), KOA style "Bunkie" cabins, tightly packed larger cabins, and a full-scale restaurant is more of a Rural or Urban ROS (recreational opportunity spectrum) level of development instead of a Roaded Natural ROS category, changing the character of Holland Lake as well as not being aligned with the 2018 Forest Plan management direction for this area.

*Proposed future commercial development and expansion for Holland Lake was not specifically identified in the 2018 Forest Plan where the public could comment on a future "vision" for the area. The plan only mentions generic "updates" as needed on the campground and other day use sites - Holland Lake Lodge and any potential development changes were excluded. The public has not had a chance to create or voice their "vision" for this special place. The proposed changes to the Lodge, increase in facilities, and resulting increases in use would irreversibly alter the character of this small lake basin - something that was not identified nor planned for in the Forest Plan.

*Administrative designation of this area as a "special management area" (as per Forest Service Manual [FSM] 2370 and FSM 2372) should be considered. By designating this as a special management area (categories can include recreation and scenic), the public can cooperatively and collaboratively create a long-term vision with the Forest Service, the Lodge owners (current and future), recreation residences, a wide array of recreation users, and residents/communities in the Seeley Swan. A collaborative, cooperative approach to creating a "vision" for this special area also follows agency sustainable recreation policy at FSM 2302 and FSM 2303.

*Per agency policy at FSM 2341.2, a needs assessment is to be conducted for any changes to existing, permitted uses. Is there truly a public need for the scope and scale and urban feel of this proposed development, at this specific location? Or is it a desire by the proponent to generate a return on investment in an easily accessible, highly unique, and very desirable recreation location?

*As part of this needs assessment, potential impacts/cumulative effects on other local commercial lodging nearby, on both private and public lands (i.e., Seeley Lake, Swan Lake, Big Fork, other lodges within the Swan Seeley Valley) should be included.

*A recreational use capacity analysis is also recommended, to determine what is the social, ecological, and physical carrying capacity of this area, which will ensure a high-quality recreation experience for all users (not just lodge guests), current and future.

*Forest Plan management direction for this area is "Roaded Natural" for ROS - this level, scope and scale of development would change this ROS classification and per the Forest Plan would require an amendment to the Forest Plan.

*I do concur that updates/investment to the Lodge facilities do need to occur - I would offer that COVID likely impacted the lodge owner tremendously; that being said, I also believe that a "vision" for the area as a whole should be established first, then the appropriate level and scale of commercial development can follow - that approach would generate a long term plan (and special area management designation?) that would provide stability and certainty not only for current and future lodge owner(s) but for the public as well. Holland Lake is a special place, and it truly is unique to Montana (a road accessible lake with a beautiful waterfall, high mountain peaks, buttressed by a magnificent wilderness area). We are fortunate that these are the public's lands. A collaborative vision and management framework, built together, will help ensure this truly remains a special place for generations to come.

Thank you again for the opportunity to comment.