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First name: Lorraine

Last name: Brewer

Organization:

Title:

Comments: Thank you for the opportunity to comment on the proposed recreation expansion in the permitted area on public land around Holland Lake. I've spent 64 years in Montana watching the increase in development and tourism adjacent to and on our public lands, and I am frankly appalled that this proposal is even being considered by the Flathead National Forest. Holland Lake truly is one the last best places. The proposed development would adversely impact the entire Holland Lake watershed for the thousands of Montanans and nonresidents that already come to the area to enjoy the historic, quiet nature of the existing lodge, camp in the already existing, busy campground, and hike the already busy existing, trails to the falls and beyond into the adjacent Bob Marshal Wilderness. The Forest must consider the changes in use and fully analyze the potential for adverse impacts to the human experience just as it must consider such impacts to fish and wildlife.

The Holland Lake watershed is part of a larger movement corridor for grizzly bear, Canada lynx, and bull trout. Tripling the capacity of the area for tourists and expanding use on a year-round basis, will have far reaching adverse direct, indirect and cumulative impacts to these protected species. The potential for increased traffic on Highway 83 alone, will increase the risk of mortality to grizzly bears and lynx, a number of which die from collisions with vehicles on an annual basis.

The Holland Lake watershed is designated critical habitat for bull trout and is essential for the survival and recovery of the species. As such, the potential for impacts reach far beyond a Categorical Exclusion (CE) level and raises concerns on how the Flathead National Forest is making CE determinations under NEPA for all projects on the Forest.

Potential impacts to bull trout and its critical habitat could occur through changes to water quality, shoreline vegetation, direct take through increases in recreational fishing, and increased disturbance to spawning areas. Concentrating human use is likely to result in significant impacts to the population and could result in the extirpation of the core area. In 2008 the bull trout population at Holland Lake was already determined to be functioning at High Risk because of extremely limited or rapidly declining numbers, range, or habitat. As a result, any added stressors from this proposal appear inconsistent with ESA and the Forest's obligation to meet Section 7a1 to maintain or recover the species.

For the above reasons, this proposal should not go forward or should be significantly reduced with an alternative developed that maintains the current human, wildlife, and fish values. The existing structures could be restored/maintained in place to meet recreational demands long into the future. The Flathead National Forest already has a number of watersheds that receive incredibly high use by the recreating public year-round that are in need of management and that should be considered when proposing more developments.

What are the cumulative impacts to the human, wildlife and fish environment from allowing a corporation that promotes ski area development from occupying and expanding in the Holland Lake Watershed and Swan Valley as a whole? Please address all questions, statements, and impacts in this letter in your analysis.

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- Lorraine Brewer