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Comments: SCOPING COMMENTS for the Holland Lake Lodge Facility Expansion

Your letter of 1 September 2022 (letter) to Interested Parties concerning the Holland Lake Lodge Facility Expansion (Project) requested comments during the Project Scoping Period. Please consider the following Scoping Comments during your analysis and decision-making activities as described in the letter.

In the letter, you state that based on a preliminary assessment the Project decision would be excluded from National Environmental Policy Act (NEPA) documentation by an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) and associated Decision Notice/Finding of No Significant Impact or Record of Decision. If the approach changes, these comments should be also considered as Scoping Comments for the EA/EIS.

Recent visits to the Holland Lake Lodge permit area and Holland Lake emphasized the need to implement actions to maintain and enhance the physical facilities for recreation and enhance environmental management/protection in the Holland Lake area. These visits also demonstrated the broad spectrum of guests to Holland Lake Lodge. The cultural legacy associated with long-term return visitors to Holland Lake Lodge is an important consideration and aspect of use that should be bolstered and perpetuated.

The Proposed Activities (Proposed Action) description in the Letter and associated documents suggests no unmanaged adverse environmental effects. The proposal supports and is consistent with Management Area 7 - Focused Recreation of the current Flathead National Forest Management Plan. Review, analysis documentation, and decision issuance should proceed with alacrity to provide not only the Permittee the authorization to proceed with needed actions but to ensure environmental and economic viability of a regional resource. The Proposed Action is a responsible proposal and should be supported and encouraged through timely permitting.

PURPOSE AND NEED

The Purpose and Need presented in the letter describes the physical actions to be undertaking it does not describe the decision(s) to be made to authorize the Proposed Action or Selected Alternative. The Purpose and Need statement might be modified to better explain the decisions and authorizations to be made for the Project.

ALTERNATIVES

The Alternatives section of a NEPA document - Environmental Assessment or Environmental Impact Statement - is a critical component of environmental effects analysis. While the analysis is responding to a specific proposal, it also presents an opportunity to consider other potentially beneficial actions in the Holland Lake area to ensure ecologic, economic, and social resiliency and sustainability for the region.

The following preliminary alternatives might be considered in your analysis.

Alternative A: No Action Alternative

Pretty much as stated in the Letter and Master Development Plan with continued decline in the existing facilities and inability to meet resource demands.

Alternative B: Proposed Action

As described in the application and Master Development Plan.

Alternative C: Modified Proposed Action

Potential modifications to the Proposed Action resulting from effect analysis and quantification.

Alternative D: Lakeside Use Abandonment Alternative.

With the Forest Plan Management Area for the Holland Lake area being Focused Recreation, existing permitted uses besides Holland Lake Lodge (e.g. summer home, private residences, etc) might be evaluated for potential abandonment to provide a greater recreation opportunity spectrum for others. This alternative might also include prohibition of motorized watercraft to reduce adverse environmental effects.

EXISTING ENVIRONMENT / AFFECTED ENVIRONMENT

The USFS is well versed in characterizing the environment in the area of potential effect for a proposal. A few resource areas might warrant some additional emphasis. These include, but are not restricted to, air quality (e.g. fugitive dust generation from the USFS Access Road), Soils and Vegetation (e.g. soil salvage management, soil health maintenance during storage, reclamation/rehabilitation of disturbances, etc), Water Quality (e.g. entrained fines from USFS Access Road in runoff, nutrient loading to lake from other existing uses, etc), Wildlife (e.g. diversity of current populations, anthropogenic subsidies of certain species such as corvids, etc), Socioeconomics (e.g. favorable effects of modern, state-of-the-science facilities, employment, taxes, etc), and Recreation (e.g. responsiveness of Proposed Action to Forest Plan, recreation demand, etc).

MANAGEMENT, MITIGATION, AND MONITORING

After over forty-five years of personal experience in natural resource management, I have found that cooperative management between regulatory/management agencies, permittees, and productive communities results in far better and more lasting and durable decisions and actions. Such cooperative efforts contribute to long-term sustainable environmental, economic, and community conditions. The Proponent seems committed to responsible management - indeed, their tenure has shown no non-compliance issues and an abundance of beneficial actions. It seems only reasonable to advance cooperative management efforts with the Proponent to implement the proposal.

Thank you for your consideration of these comments.