

Data Submitted (UTC 11): 10/6/2022 5:10:18 PM

First name: Edward

Last name: Stalling

Organization:

Title:

Comments: Re: Holland Lake Lodge Facility Improvement & Expansion #61746?

I hereby amend my early comments submitted at the beginning of the scoping process, because the initial scoping documents were incomplete (e.g., several Appendices were blank including the missing National Registry of Historic Place Appendix), and since my original comment, far more information has been given to the public about the proposed expansion.

For the record, my degree is in Forest Management from Colorado State University, I worked for the US Forest Service (Tongass National Forest) for ten years, and was heavily involved in EIS and NEPA process, including serving on Interdisciplinary Teams.

I ask the Flathead National Forest to reject this proposal for expansion of the Holland Lake Lodge and prepare an EIS that explores a wide range of alternatives that address (1) the cumulative effects of all increased commercial recreation and SUP's in the Flathead National Forest, (2) the impact of the expansion on wildlife habitat and many species including grizzly bears, lynx, wolverines, fur-bearers, black bears, deer, and elk that will occur with this lodge expansion due to increased recreation on public lands outside the 15-acre lodge site, (3) the significant adverse effect the changes would have on eliminating the area as eligible for listing on the National Register of Historic Places as an historic district, essentially destroying cultural resources, and (4) The effects of degrading the "specialness" of this rare setting (and a setting that is rapidly getting rarer, which means its value continues to increase.

I am extremely concerned about how the process has evolved (e.g. the many items left out of the initial scoping documents) and the impact the process for this proposal has had on the public perception and trust for the US Forest Service, and the NEPA process.

I am concerned - and confused - about why the Special Use Permit would or could be transferred to the new owner when the permit itself appears to say that this is not permissible.

Despite many potential impacts, no alternatives have been proposed to mitigate these impacts, or even to fully understand what the impacts include. Use of a Categorical Exclusion under such circumstances seems unwise and unlawful. These circumstances and potential impacts have been detailed by many local and state-wide scientists and thought-leaders, and groups, whom I respect and trust. Hereby incorporate their comments by reference: 1). Arlene Montgomery on behalf of Friends of the Wild Swan; 2) Hillary Eisen on behalf of Winter Wildlands Alliance; 3) Steve Kelly on behalf of the Council on Wildlife and Fish and Alliance for the Wild Rockies; 4) John Meyer for Cottonwood Environmental Law Center; 5) Kristine Akland on behalf of the Center for Biological Diversity; 6) Michael Garrity on behalf of Alliance for the Wild Rockies, Center for Biological Diversity, and Council on Wildlife and Fish; 7) Martin Nye, Director of the Bolle Center for People and Forests in the WA Franke of College of Forestry and Conservation at the University of Montana, an expert on Forest Policy and NEPA; 8) Dr. Chris Servheen, retired FWS Grizzly Bear Recovery Coordinator and now President of Montana Wildlife Federation, Montana's oldest and largest conservation organization; and (9) Keith J. Hammer, Board Member representing Swan View Coalition.

I am greatly concerned that the documents related to Holland Lake Lodge qualifying as a National Register of Historic Places were omitted from the original scoring documents. There was an Appendix for that document, but no document. I since understand that experts hired by Holland Lake Lodge determined that the buildings and site could qualify. As Fred P. Clark (30 year career with USFS with extensive NEPA planning) has commented,

the extensive changes to the setting as envisioned by the plan include removing most of the buildings that contribute to its eligibility for inclusion on the National Register of Historic Places, and would create a multitude of other buildings that are not historic structures. The changes would eliminate the area as eligible for listing on the National Register of Historic Places as a historic district, essentially destroying cultural resources. That would be an unacceptable significant adverse effect. Fifteen acres of our public land that may be eligible for inclusion in the National Register of Historic Places or District needs to be considered as an alternative in the NEPA process, before those buildings are altered.

The potential impacts of the proposal are enormous, and extend far beyond the 15-acres of the Special Use Permit. I ask Flathead National Forest to reject the proposal, consider the cumulative effects of all related SUP's in the area (rather than one by one), and develop alternatives as per the NEPA process.

Edward Stalling  
Missoula, MT