

Data Submitted (UTC 11): 10/7/2022 5:47:19 PM

First name: Kristi

Last name: DuBois

Organization:

Title:

Comments: I am writing to express my large concern about the proposed development at Holland Lake. The proposal as it currently stands represents a large change in human activity in the area. The footprint of influence will extend well beyond the permit area due to the large influx of people that will come in to use the facility. I urge the forest service to complete an EA rather than a categorical exclusion on this proposal, to fully analyze the potential impacts to the environment, as well as the social impacts on the current users of this area.

It is difficult to believe that this proposed development will be limited to a lodge, cabins, and restaurant. We need to have the whole story on their long-term plans for the area and the type of "adventure" recreation they plan on developing in the future to make this resort financially viable. What exactly will their guests be doing while they are there? Piecemeal environmental assessments by breaking up proposed developments into smaller stages will miss the cumulative effects of the development over the long term.

Issues that need to be addressed include impacts on T/E species as well as sensitive species in the Holland Lake area, as well as nearby lakes as this development may push traditional recreational users of the area to other lakes such as Lindberg Lake, increasing use on those lakes. Impacts on current recreational users should be fully evaluated, as Holland Lake is a popular destination for many Montanans who would not be able to afford a stay in a "luxury" resort. The Holland Lake campground is extremely popular and is also in need of some upgrades. Building a big resort next to the campground may negatively impact campers using the campground. This development will likely increase vehicle traffic on the Holland Lake Road, which would negatively impact nearby campers and increase road kill of wildlife. These potential impacts on wildlife and current recreational users points to the need to do an EA to determine the scope of the impacts from this development, and determine if a full EIS is necessary.

Including the lakeshore in the permit footprint puts water quality and public access at risk. That lakeshore belongs to the public. The lakeshore should not be included in the permit area, and public access on the lake should not be restricted. Cabins should be pulled back farther from the lake, and trees along the lakeshore preserved. Additionally, the lakeshore should be maintained in a natural condition as much as possible, other than a very limited footprint for water recreation, similar to what is there now. Expanding human "habitat" along the lakeshore, such as mowed lawns, created beaches, and structures would be very detrimental to the health of the lake.

The Holland Lake area supports a number of T/E and sensitive species and habitats. Numerous small seasonal wetlands in the vicinity of the development support populations of *Howellia aquatilis*, which was recently delisted, but is still considered a Species of Concern in Montana. Some of these wetlands are quite close to the public road going into the lake, and could be negatively impacted by invasive plants brought in on construction equipment as well as public vehicles. *Schoenoplectus subterminalis* is another plant Species of Concern that grows along the lakeshore near the campground, close to the development area.

Common loons nest on Holland Lake. They are very sensitive to disturbance, including non-motorized boat use near their nest sites. Recreational use on most Montana lakes has been increasing in recent years, and this development could potentially increase recreation use of Holland lake even more. Potential impacts of this increase in use, especially by people not familiar with Montana culture and wildlife should be fully evaluated and mitigated if the development is approved.

I suggest that a smaller scale of development is much more appropriate for this area, one with fewer cabins, farther from the lakeshore, and maintaining the lodge as a rustic destination, rather than a large luxury resort.

I urge you to complete a full EA and possibly an EIS to fully analyze development alternatives for this public land area. This should include full disclosure by the developers of what they have planned over the long-term for their "adventure" guests.

Thank you very much.