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Comments: Thank you for the opportunity to comment on the Holland Lake Lodge Facility Expansion Project and for your careful consideration of this letter from an avid user of our public lands. I have lived in the Missoula valley for 26 years and have spent numerous, magical days hiking along the Swan Crest and other public lands adjacent to the project area.

I am very surprised that the Flathead National Forest intends to categorically exclude the significant expansion of Holland Lake Lodge as per your "Scoping Notice: Holland Lake Lodge Facility Expansion". This privately-operated resort expansion project appears ineligible for a Categorical Exclusion (CE) at the outset as per the regulations governing the use of a CE. It is imperative that a project of this magnitude go through a rigorous environmental analysis to fully evaluate the effects on the natural and physical environment and the relationship of people with that environment. CEs are intended for projects which do not individually or cumulatively have a significant effect on the environment.

Holland Lake is on the border of the Swan Front Recommended Wilderness and serves as a gateway to the Bob Marshall Wilderness, ecosystems critical to wildlife and climate mitigation. There are multiple potential impacts on wildlife that a CE would not adequately consider, such as the fact that Holland Lake Lodge is located within a Grizzly Bear Migration corridor between the Mission Mountains and the Swan Range. In addition, the Scoping Notice and Master Development Plan offer no other circumstances that would lessen the impacts or be sufficient to avoid significant effects. The permit area and nearby Forest Service lands are within lynx, grizzly bear, and bull trout habitats. Federal laws and regulations require the federal government to evaluate the effects of its actions on the environment and to consider alternative courses of action, as per the National Environmental Policy Act of 1969. This would include considering, among other things, impacts regarding water quality, wilderness character, wildlife habitat, wetlands, increased visitor use and traffic, wildfire risk, and noise and visual changes. The Scoping Notice and Holland Lake Lodge Master Development Plan suggest that the lodge may change from being solely open in the summer to operating year-round thus expanding its potential impacts on wildlife that require high elevation winter habitat.

The point made in the Scoping Notice and numerous quotes from FNF Supervisor underline the need for additional recreational opportunities for Americans eager to enjoy their public lands; this point is well taken. BUT the piecemeal approach of approving a project here, a special use permit there, is shortsighted and potentially harmful to public lands. The US Forest Service must take a measured and science-based approach before opening up public lands to inappropriate recreational uses. Each National Forest should do this with significant opportunity for public input to avoid the debacle that is playing out in Holland Lake.

Thank you for your consideration,

Daphne Herling

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